John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

5/22/2014

Certified Mail

Mr. Paul Bugeau
Wausau Paper Towel & Tissue, LLC
700 Columbia Avenue
Middletown, OH 45042

Facility ID: 1409010043
Permit Number: P0096493
County: Butler

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 3/31/2014. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. 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 permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

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

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

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

Cc: Southwest Ohio Air Quality Agency

Response to Comments

Facility ID:	1409010043
Facility Name:	Wausau Paper Towel & Tissue, LLC
Facility Description:	Paper products
Facility Address:	700 Columbia Ave. Middletown, OH 45042 Butler County
Permit:	P0096493, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Journal News on 04/02/2014. The comment period ended on 05/02/2014.	
Hearing date (if held)	**NA**
Hearing Public Notice Date (if different from draft public notice)	NA

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

Comments from Wausau Paper Towel & Tissue LLC, dated 5/1/2014:

1. Topic: Section C. Terms & Conditions for Boilers - Emissions Units B001, B002, and B004

a. Comment: Correct terminology is a multiclone, instead of the term “cyclone”, as the collection device that precedes the scrubbers on the boilers. Request revision of the descriptions for B001, B002, and B004.

Response: Ohio EPA will agree to make the changes in the boiler descriptions.

b. Comment: Request that language be added to clarify that the particulate emission limit in term b)(1)c. applies only when fuel oil is combusted.

Response: Ohio EPA will agree to make the changes as appropriate.

c. Comment: The boilers are defined in the Boiler GACT Subpart JJJJJJ as coal subcategory units only based on the definitions of coal subcategory and oil subcategory in this rule. Request that the description in b)(1)f. be revised since the boilers are only subject to regulation in the coal subcategory. In addition, tune up requirements do not apply to these boilers in the coal subcategory and should be removed from c)(6). The requirements of 63.11222 and Table 7 of Subpart JJJJJJ should be included in term c)(6).

Response: Ohio EPA will agree to make the changes as appropriate.

d. Comment: Request revisions to the coal sampling methodology in term d)(2) for the boilers to allow for coal sample collection not less than 3 days per week from the common coal handling system, instead of daily sample collection at each emissions unit.

Response: The daily coal sampling methodology contained in the Draft Title V Operating Permit terms is based on the monitoring requirements found in Permit to Install (PTI) #14-05967, issued 11/20/2007, for the boilers. The Title V Operating Permit cannot contain less stringent requirements than the underlying PTI for the boilers; therefore, Ohio EPA cannot make the requested revisions at this time. An application for a modification to the PTI is required to request changes to the monitoring requirements for the boilers. Upon final approval of the PTI modification, any revisions to the monitoring requirements may be incorporated into the Title V permit.

e. Comment: Request removal of the sentence regarding "once per shift" record keeping of the scrubber pressure drop and flow rate in term d)(5) for the boilers since it is not applicable. Continuous monitoring and recording devices will be used as outlined in the CAM Plan.

Response: Ohio EPA will agree to make the changes as appropriate.

f. Comment: Request adding the word "system" in term d)(7) for the boilers to clarify that the term applies to the monitoring <u>systems</u> that are subject to CAM, malfunctions, and repairs.

Response: Ohio EPA will agree to make the changes as appropriate.

g. Comment: Request adding downtime reporting exclusion for system malfunctions, repairs, and QA/QC activities to term e)(5)c. for the boilers to be consistent with term d)(7).

Response: Ohio EPA agrees to add clarification for the QA/QC activities that are excluded from monitoring system downtime reporting. Monitoring system downtime as a result of malfunction and/or repair is not excluded from reporting pursuant to the CAM requirements of 40 CFR 64.9(a)(ii). Therefore, Ohio EPA cannot agree to exclude these events. Term d)(7), in part, addresses data collection and validity during periods of malfunction, which is a separate issue from overall monitoring system downtime reporting requirements.

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Wausau Paper Towel & Tissue, LLC

Facility ID:	1409010043
Permit Number:	P0096493
Permit Type:	Renewal
Issued:	5/22/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Wausau Paper Towel & Tissue, LLC

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Authorization

Facility ID:	1409010043
Facility Description:	Paper products.
Application Number(s):	A0028108, A0028109, A0028110, A0028111
Permit Number:	P0096493
Permit Description:	Renewal of Title V Operating Permit for Wausau Paper & Towel, a secondary papermill consisting of coal-fired boilers, paper machine lines, and de-inking operations.
Permit Type:	Renewal
Issue Date:	5/22/2014
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0096492

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

Wausau Paper Towel & Tissue, LLC
700 Columbia Ave.
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 and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
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 For State-Only Requirements

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

(5) Standard Term and Condition A. 30.

(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 recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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

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

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

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

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

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

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

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

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Southwest Ohio Air Quality Agency. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

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

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

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

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

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

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.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 to the Southwest Ohio Air Quality Agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable

requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

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

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

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

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

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

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

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

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

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

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

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

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

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

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

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

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

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

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

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

7. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(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

Officialthat, 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 Southwest Ohio Air Quality 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 Southwest Ohio Air Quality Agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

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

(2) Compliance certifications shall include the following:

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

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

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

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

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

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

14. Permit Shield

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

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

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

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [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 Southwest Ohio Air Quality 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 Southwest Ohio Air Quality 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 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

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

20. Permit to Install Requirement

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

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

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(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.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

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

23. Title VI Provisions

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

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

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

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

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

24. Reporting Requirements Related to Monitoring and Record Keeping 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 theSouthwest Ohio Air Quality 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 Southwest Ohio Air Quality Agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention 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 For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Southwest Ohio Air Quality 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 Southwest Ohio Air Quality Agency must be notified in writing of any transfer of this permit.

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

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

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

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

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Southwest Ohio Air Quality Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. There are no insignificant emissions units at this facility.

3. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources Industrial, Commercial, and Institutional Boilers: B001, B002, and B004. The U.S. EPA is responsible for the administration of the requirements of this rule at this time. It should be noted that the enforcement authority of the GACT requirements is not delegated to Ohio EPA at the time of this permit processing. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website http://www.ecfr.gov or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

   (Authority for term: 40 CFR Part 63)

4. The Southwest Ohio Air Quality Agency has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions units B001, B002, and B004. The permittee shall comply with the provisions of the plan (as specified in Part C - Terms and Conditions for Emissions Units) during any operation of the aforementioned emissions units.

   (Authority for term: 40 CFR Part 64)

5. The actual emissions of Hazardous Air Pollutants (HAPs), as identified inSection 112(b) of Title III of the Clean Air Act from emissions units B001 (Boiler No. 1 - 95 MMBtu/hr pulverized coal/oil-fired boiler with multiclone and scrubber), B002 (Boiler No. 2 - 95 MMBtu/hr pulverized coal/oil-fired boiler with multiclone and scrubber), B004 (Boiler No. 4 - 174 MMBtu/hr pulverized coal/oil-fired boiler with multiclone and scrubber), F002 (Ash Handling), F003 (Coal Handling System, Coal Storage Unloading/Conveying System), F101 (Paved and Unpaved Roadways and Parking Areas), P101 (Paper Machine No. 1), P102 (Paper Machine No. 2), P103 (Natural De-Inking), P104 (Bleach De-Inking), P107 (Broke System),any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units, or future constructed emissions units, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.

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

6. The permittee shall collect and record the following information each month for the emissions units identified in 5.:

   a) the name and identification number of each HAP containing material employed (if applicable);

   b) the identification of each individual HAP contained in each material employed (if applicable);

   c) the HAP emission factor for each individual HAP and each type of operation;

   d) the total individual HAP emissions for each HAP from all sources, in pounds or tons per month;

e) the total combined HAP emissions from all sources, in pounds or tons per month [the summation of the individual HAP emissions from d) above];

f) the updated rolling, 12-month summation of the individual HAP emissions for each HAP, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and

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

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting Southwest Ohio Air Quality Agency. This information does not have to be kept on an individual emissions unit basis.

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

7. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations outlined in 5. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June, and July through September, respectively).

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

8. Emission Limitation:

HAP emissions shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling, 12-month summation for the emissions units listed in 5.

Applicable Compliance Method:

Compliance with the HAP emission limitations in 5.shall be demonstrated by the record keeping requirements specified in 6.

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

C. Emissions Unit Terms and Conditions

1. B001, Boiler No. 1 (MHI)

Operations, Property and/or Equipment Description:

Boiler No. 1 - 95 MMBtu/hr pulverized coal/oil-fired boiler with multiclone and scrubber

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(D) (PTI 14-05967, issued 11/20/2007) *Voluntary Restrictions to Avoid Non-Attainment New Source Review and Prevention of Significant Deterioration*	Particulate emissions (PE) and particulate matter 10 microns and less in diameter (PM10) emissions shall not exceed 0.06 pound per MMBtu of actual heat input when burning coal. See b)(2)a., b)(2)b., c)(2), and c)(3).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.02 pound per MMBtu of actual heat input when burning only No. 2 fuel oil.
d.	OAC rule 3745-17-10(C)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
e.	OAC rule 3745-18-15(F)	Sulfur dioxide (SO2) emissions shall not exceed 1.4 pounds per MMBtu of actual heat input. See b)(2)c.
f.	40 CFR Part 63, Subpart JJJJJJ (40 CFR 63.11193-11237)	Applicable Emission Limits in Table 1; Work Practice Standards, Emission Reduction Measures, and Management

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources [In accordance with 40 CFR 63.11200 and 63.11237, this emissions unit is an existing pulverized coal and oil-fired boiler subject to the coal subcategory requirements as defined in this subpart. The permittee shall comply with the emission limitations and operating limitations specified in this section.]	Practices in Table 2; and Operating Limits in Table 3 to Subpart JJJJJJ of 40 CFR Part 63. See b)(2)e. and c)(6). Pursuant to 40 CFR 63.11196(a), the permittee shall comply with this subpart no later than March 21, 2014.
g.	40 CFR 63.1-15 (40 CFR 63.11235)	Table 8 to 40 CFR Part 63, Subpart JJJJJJ – Applicability of General Provisions (Subpart A) to Subpart JJJJJJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
h.	40 CFR Part 64 (40 CFR 64.1-10) Compliance Assurance Monitoring (CAM)	See b)(2)f., c)(7), c)(8), d)(5), d)(6), d)(7), d)(10), d)(11), d)(12), e)(5), and e)(6).

(2) Additional Terms and Conditions

a. The emissions from emissions units B001 (Boiler No. 1 - 95 MMBtu/hr pulverized coal/oil-fired boiler with multiclone and scrubber), B002 (Boiler No. 2 - 95 MMBtu/hr pulverized coal/oil-fired boiler with multiclone and scrubber), and B004 (Boiler No. 4 - 174 MMBtu/hr pulverized coal/oil-fired boiler with multiclone and scrubber), combined, shall not exceed:

i. 38.02 tons per year of PE, based upon a rolling, 12-month summation of the monthly emissions;

ii. 38.03 tons per year of PM10, based upon a rolling, 12-month summation of the monthly emissions;

iii. 896.62 tons per year of SO2, based upon a rolling, 12-month summation of the monthly emissions;

iv. 545.70 tons per year of nitrogen oxides (NOx) emissions, based upon a rolling, 12-month summation of the monthly emissions;

v. 1.50 tons per year of volatile organic compound (VOC) emissions, based upon a rolling, 12-month summation of the monthly emissions; and

vi. 12.63 tons per year of carbon monoxide (CO) emissions, based upon a rolling, 12-month summation of the monthly emissions.

b. The permittee shall operate the multiclone and venturi scrubber at all times when this emissions unit is in operation.

c. The emissions unit shall be vented to a stack no lower than two hundred feet above ground level.

d. Compliance with OAC rule 3745-31-05(D) shall be demonstrated by the emission limitations, the use of multiclone and scrubber control equipment, and the annual fuel usage restrictions.

e. The permittee shall comply with the applicable emission limits required under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:

63.11201 and Table 1 to Subpart JJJJJJ	Mercury emissions shall not exceed 2.2 E-05 pound per MMBtu of heat input.
63.11201 and Table 1 to Subpart JJJJJJ	Carbon monoxide (CO) emissions shall not exceed 420 ppm by volume on a dry basis corrected to 3 percent oxygen.

f. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

c) Operational Restrictions

(1) The permittee shall burn only coal 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(D))

(2) The maximum annual No. 2 fuel oil usage for emissions units B001, B002, and B004, combined, shall not exceed 100,000 gallons per year, based upon a rolling, 12-month summation of the monthly fuel oil usage.

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

(3) The annual ton per year emission limitations specified in b)(2)a. above for PE, PM10, SO2, NOx, VOC, and CO are based upon a maximum annual coal usage rate for emissions units B001, B002, and B004, combined, which shall not exceed 49,500 tons per year, based upon a rolling, 12-month summation of the monthly coal usage.

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

(4) The quality of coal received for burning in this emissions unit shall have a combination of sulfur content and heat content, on an "as-received" wet basis, which is sufficient to comply with the allowable SO2 emission limitation.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-18-04, and OAC rule 3745-18-15)

(5) The quality of the No. 2 fuel oil burned in this emissions unit shall have a combination of heat and sulfur content, on an "as-received" basis, which is sufficient to comply with the allowable SO2 emission limitation.

(Authority for term: OAC rule 3745-77-07(A)(1) andOAC rule 3745-18-15)

(6) The permittee shall comply with the applicable work practice standards, emission reduction measures, management practices, and operating limit requirements required under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:

63.11201, 63.11223, and Table 2 to Subpart JJJJJJ	general duty to minimize startup and shutdown periods and conduct startups and shutdowns according to the manufacturer's recommended procedures
63.11201 and Table 2 to Subpart JJJJJJ	one-time energy assessment requirements
63.11201 and Table 3 to Subpart JJJJJJ	applicable operating limitations
63.11211 and Table 6 to Subpart JJJJJJ	requirements for establishing operating limitations
63.11222 and Table 7 to Subpart JJJJJJ	requirements for demonstrating continuous compliance

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart JJJJJJ)

(7) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the scrubber, that must be maintained in order to demonstrate compliance, shall not be less than8 inches of water as a 3-hour rolling average.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(D), and 40 CFR Part 64)

(8) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable scrubber liquid flow rate, that shall be maintained in order to demonstrate compliance, shall not be less than the minimum water flow rate (in gallons per minute), as a 3-hour rolling average, established during the most recent emissions test that demonstrated the emissions unit to be in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(D), and 40 CFR Part 64)

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than coal 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(D))

(2) The permittee shall collect a representative sample of coal received for burning each month. The coal sampling shall be performed as follows:

On each day this emissions unit is in operation, the permittee shall collect a sample (approximately 0.33 cubic foot of coal) from the coal handling system at a point after the coal exits the crusher. The permittee shall pour the daily sample into a sample container and mix the sample with the previous days' sample(s). At the end of each week, the permittee shall again mix the sample container and collect and retain approximately 0.5 cubic foot of coal from the sample container in a sample bag. At the end of each month, the permittee shall pour each weekly sample bag into a sample container and mix the contents, then collect approximately 0.5 cubic foot of the mixed coal for laboratory testing.

Each monthly representative sample of coal shall be analyzed for sulfur content (percent), ash content (percent), and heat content (Btu/pound of coal). The analytical methods to be used to determine the ash content, sulfur content, and heat content shall be the most recent version of: ASTM method D3174, AshintheAnalysisofCoalandCoke; ASTM method D3177, TotalSulfurintheAnalysisSampleofCoalandCoke or ASTM method D4239, SulfurintheAnalysisSampleofCoalandCokeUsingHighTemperatureTubeFurnaceCombustionMethods; and ASTM method D5865 GrossCalorificValueofCoalandCoke, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(D)(9)(c)(ii), and OAC rule 3745-18-15)

(3) The permittee shall maintain monthly records of the total quantity of coal received, the results of the analyses for sulfur content, ash content, and heat content, and the calculated average SO2 emission rate for the month, in lbs/MMBtu of actual heat input. The SO2 emission rate shall be calculated by methods specified in OAC rule 3745-18-04(F)(1).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(D), and OAC rule 3745-18-15)

(4) For each shipment of oil received for burning in this emissions unit, the permittee shall 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 SO2 emission rate (in lbs/MMBtu). The SO2 emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)(2). The permittee shall collect or 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 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 and D4294), or equivalent methods as approved by the Director.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(E)(7), OAC rule 3745-18-04(I), and OAC rule 3745-18-15)

(5) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop across the scrubber (in inches of water) and the scrubber liquid flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in c)(7) and c)(8), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in c)(7) and c)(8), unless the permittee determines that corrective action is not necessary and

documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date the corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop and flow rate readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D), and 40 CFR Part 64)

(6) The permittee shall collect and record on a daily basis each period (date and total time) of downtime or bypass of the scrubber, and/or downtime of the scrubber pressure drop and/or flow rate monitoring equipment, when the associated emissions unit was in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(7) Except for, as applicable, monitoring system malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring system malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(8) The permittee shall collect and record the following information each month for emissions units B001, B002, and B004 combined:

a. the total amount of coal used, in tons per month;

b. the updated rolling, 12-month summation of coal usage, in tons (the total amount of tons for the current month plus the total amount of tons for the previous eleven calendar months);

c. the total amount of No. 2 fuel oil used, in gallons per month;

d. the updated rolling, 12-month summation of fuel oil usage, in gallons (the total amount of gallons for the current month plus the total amount of gallons for the previous eleven calendar months);

e. the total emissions, in tons, for PE, PM10, SO2, NOx, VOC, and CO for each month; and

f. the updated rolling, 12-month summation emissions total, in tons, for PE, PM10, SO2, NOx, VOC, and CO (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).

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

(9) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:

63.11224(a)	either install, operate, and maintain a CEMS for CO and oxygen; or install, operate, and maintain an oxygen analyzer system
63.11225(c)	required overall records to be maintained
63.11225(d)	record format and retention requirements

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJJJ)

(10) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissionsis the pressure drop across the scrubber and scrubber liquid flow rate.

The scrubber operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements as specified in d)(5). The scrubber indicator range is specified in c)(7). When the monitored value for pressure drop is outside of the range specified in c)(7), corrective action (including, but not limited to, an evaluation of the emissions unit and scrubber) will be required.

The scrubber operating parameters are measured and recorded by the continuous scrubber liquid flow rate monitoring equipment and the associated record keeping requirements as specified in d)(5). The scrubber indicator range is specified in c)(8). When the monitored value for scrubber liquid flow rate is outside of the range specified

in c)(8), corrective action (including, but not limited to, an evaluation of the emissions unit and scrubber) will be required.

Upon detecting an excursion of the pressure drop across the scrubber and/or scrubber liquid flow rate, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(11) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(12) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(13) 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 #14-05967, issued on 11/20/2007:d)(1) – d)(12). 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) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any fuel burned in this emissions unit other than coal or No. 2 fuel oil. The notification shall include a copy of such record and shall be submitted to the Southwest Ohio Air Quality Agency within 30 days after the deviation occurs.

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

(2) The permittee shall submit quarterly reports concerning the quantity and quality of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:

a. the total quantity of coal received (tons);

b. the average ash content (percent by weight) of the coal received;

c. the average sulfur content (percent by weight) of the coal received;

d. the average heat content (Btu/pound) of the coal received; and

e. the average SO2 emissions rate (pounds SO2/MMBtu actual heat input) from the coal received.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to Southwest Ohio Air Quality Agency and shall cover the coal received during the previous calendar quarter.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(D), and OAC rule 3745-18-15)

(3) The permittee shall submit, on a quarterly basis, copies or summaries of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent), heat content (Btu/gallon), and SO2 emission rate (pounds/MMBtu) for each shipment of oil. The total quantity of oil received in each shipment (gallons) shall also be included with the copies or summaries of the permittee's or oil supplier's analyses.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to Southwest Ohio Air Quality Agency and shall cover the oil shipments received during the previous calendar quarter.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(E), and OAC rule 3745-18-15)

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

a. an identification of all exceedances of the rolling, 12-month coal usage limitation for emissions units B001, B002, and B004, combined, as specified in c)(3);

b. an identification of all exceedances of the rolling, 12-month No. 2 fuel oil usage limitation for emissions units B001, B002, and B004, combined, as specified in c)(2); and

c. an identification of all exceedances of the rolling, 12-month emission limitations for PE, PM10, SO2, NOx, VOC, and CO for emissions units B001, B002, and B004, combined, as specified in b)(2)a.

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(D))

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

a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber and/or the liquid flow rate was/were outside of the appropriate range or exceeded the applicable limit contained in this permit, the cause of each incident, and the corrective action(s) taken for each incident;

b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the scrubber;

c. the date, time, and duration of any downtime of the scrubber continuous monitoring equipment (other than downtime associated with required quality assurance or control activities, including, as applicable, calibration checks and required zero and span checks and adjustments) while the emissions unit was in operation, the cause of each incident, and the corrective action(s) taken for each incident;

d. each incident of deviation described in “a”, “b”, or “c” (above) where a prompt investigation was not conducted;

e. each incident of deviation described in “a”, “b”, or “c” where prompt corrective action, that would bring the emissions unit into compliance and/or the pressure drop and/or liquid flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and

f. each incident of deviation described in “a”, “b”, or “c” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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(D), and 40 CFR Part 64)

(6) If the permittee is required under 40 CFR 64.8 and d)(12) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(7) The permittee shall submit annual reports which specify the total PE, PM10, SO2, NOx, VOC, and CO emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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

(8) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:

63.11214(b), (c), and (d) and 63.11225(a)	Notification of Compliance Status requirements
63.11225(b)	content and submission of compliance certification reports

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJJJ)

(9) 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))

(10) 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 #14-05967, issued on 11/20/2007: e)(1) – e)(9). 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 Limitation:

PE shall not exceed 0.02 pound per MMBtu of actual heat input when firing only No. 2 fuel oil.

Applicable Compliance Method:

Compliance may be determined by multiplying an emission factor of 2.0 lbs of PE/1000 gallons of oil fired by the emissions unit's maximum hourly fuel oil firing capacity (in 1000 gallons/hr) and dividing by the emissions unit's rated heat input capacity (95 MMBtu/hr). This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (5/10).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-10(B)(1))

b. Emission Limitation:

SO2 emissions shall not exceed 1.4 lbs/MMBtu.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above SO2 emission limitation based on the monitoring and record keeping requirements in d)(2), d)(3), and d)(4) and the reporting requirements in e)(2) and e)(3) of this permit. The SO2 emission rate shall be calculated pursuant to the equations specified in OAC rule 3745-18-04(F). When multiple fuels are burned, the SO2 emission rate is the sum of SO2 from all fuels burned divided by the sum of the Btu value of all fuels burned.

If required, the permittee shall demonstrate compliance with this emission limitation 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, and OAC rule 3745-18-15)

c. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Test Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

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), OAC rule 3745-17-03(B)(1)(a), and OAC rule 3745-17-07(A))

d. Emission Limitations:

The emissions from emissions units B001, B002, and B004, combined, shall not exceed the following based upon rolling, 12-month summations of the monthly emissions:

38.02 TPY of PE;

38.03 TPY of PM10;

896.62 TPY of SO2;

545.70 TPY of NOx;

1.50 TPY of VOC; and

12.63 TPY of CO.

Applicable Compliance Method:

Compliance with the VOC, NOx, and CO emission limitations specified above shall be determined by the record keeping requirements specified in d)(8) and the pollutant-specific emission factors specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 1 External Combustion Sources, Sections 1.1 (9/98) and 1.3 (5/10). Compliance with the SO2 emission limitation specified above shall be determined by the record keeping requirements specified in d)(3), d)(4), and d)(8). Compliance with the PE and PM10 emission limitations specified above shall be determined by the record keeping requirements specified in d)(8) and emission testing required in f)(1)e. of this permit.

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

e. Emission Limitation:

When burning coal: 0.06 pound of PE/PM10 per MMBtu of actual heat input.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted within 6 months following the effective date of this permit and within 6 months prior to permit expiration.

ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of 0.06 lb of PE/PM10 per MMBtu of actual heat input, when burning coal.

iii. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate:

40 CFR Part 60, Appendix A, Methods 1 through 5; and

40 CFR Part 51, Appendix M, Method 201 or 201A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

If the permittee demonstrates to the Southwest Ohio Air Quality Agency that Methods 201, 201A, and/or 202 for determination of PM10 emissions is not technically feasible due to the stack conditions of this emissions unit, the permittee shall demonstrate compliance with the PM10 allowable mass emission rate through the appropriate PM10 emission factors based on U.S. EPA AP-42 guidance documents.

iv. During the test, the pressure drop across the scrubber and scrubber liquid flow rate shall be recorded at least every 15 minutes.

v. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

vi. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may

result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

vii. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

viii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D), and 40 CFR Part 64)

(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 #14-05967, issued on 11/20/2007: f)(1). 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. B002, Boiler No. 2 (MHI)

Operations, Property and/or Equipment Description:

Boiler No. 2 - 95 MMBtu/hr pulverized coal/oil-fired boiler with multiclone and scrubber

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(D) (PTI 14-05967, issued 11/20/2007) *Voluntary Restriction to Avoid Non-Attainment New Source Review and Prevention of Significant Deterioration*	Particulate emissions (PE) and particulate matter 10 microns and less in diameter (PM10) emissions shall not exceed 0.06 pound per MMBtu of actual heat input when burning coal. See b)(2)a., b)(2)b., c)(2), and c)(3).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.02 pound per MMBtu of actual heat input when burning only No. 2 fuel oil.
d.	OAC rule 3745-17-10(C)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
e.	OAC rule 3745-18-15(F)	Sulfur dioxide (SO2) emissions shall not exceed 1.4 pounds per MMBtu of actual heat input. See b)(2)c.
f.	40 CFR Part 63, Subpart JJJJJJ (40 CFR 63.11193-11237) National Emission Standards for	Applicable Emission Limits in Table 1; Work Practice Standards, Emission Reduction Measures, and Management Practices in Table 2; and Operating Limits

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources [In accordance with 40 CFR 63.11200 and 63.11237, this emissions unit is an existing pulverized coal and oil-fired boiler subject to the coal subcategory requirements as defined in this subpart. The permittee shall comply with the emission limitations and operating limitations specified in this section.]	in Table 3 to Subpart JJJJJJ of 40 CFR Part 63. See b)(2)e. and c)(6). Pursuant to 40 CFR 63.11196(a), the permittee shall comply with this subpart no later than March 21, 2014.
g.	40 CFR 63.1-15 (40 CFR 63.11235)	Table 8 to 40 CFR Part 63, Subpart JJJJJJ – Applicability of General Provisions (Subpart A) to Subpart JJJJJJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
h.	40 CFR Part 64 (40 CFR 64.1-10) Compliance Assurance Monitoring (CAM)	See b)(2)f., c)(7), c)(8), d)(5), d)(6), d)(7), d)(10), d)(11), d)(12), e)(5), and e)(6).

(2) Additional Terms and Conditions

a. The emissions from emissions units B001 (Boiler No. 1 - 95 MMBtu/hr pulverized coal/oil-fired boiler with multiclone and scrubber), B002 (Boiler No. 2 - 95 MMBtu/hr pulverized coal/oil-fired boiler with multiclone and scrubber), and B004 (Boiler No. 4 - 174 MMBtu/hr pulverized coal/oil-fired boiler with multiclone and scrubber), combined, shall not exceed:

i. 38.02 tons per year of PE, based upon a rolling, 12-month summation of the monthly emissions;

ii. 38.03 tons per year of PM10, based upon a rolling, 12-month summation of the monthly emissions;

iii. 896.62 tons per year of SO2, based upon a rolling, 12-month summation of the monthly emissions;

iv. 545.70 tons per year of nitrogen oxides (NOx) emissions, based upon a rolling, 12-month summation of the monthly emissions;

v. 1.50 tons per year of volatile organic compound (VOC) emissions, based upon a rolling, 12-month summation of the monthly emissions; and

vi. 12.63 tons per year of carbon monoxide (CO) emissions, based upon a rolling, 12-month summation of the monthly emissions.

b. The permittee shall operate the multiclone and venturi scrubber at all times when this emissions unit is in operation.

c. This emissions unit shall be vented to a stack no lower than two hundred feet above ground level.

d. Compliance with OAC rule 3745-31-05(D) shall be demonstrated by the emission limitations, the use of multiclone and scrubber control equipment, and the annual fuel usage restrictions.

e. The permittee shall comply with the applicable emission limits required under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:

63.11201 and Table 1 to Subpart JJJJJJ	Mercury emissions shall not exceed 2.2 E-05 pound per MMBtu of heat input.
63.11201 and Table 1 to Subpart JJJJJJ	Carbon monoxide (CO) emissions shall not exceed 420 ppm by volume on a dry basis corrected to 3 percent oxygen.

f. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

c) Operational Restrictions

(1) The permittee shall burn only coal 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(D))

(2) The maximum annual No. 2 fuel oil usage rate for emissions units B001, B002, and B004, combined, shall not exceed 100,000 gallons per year, based upon a rolling, 12-month summation of the monthly fuel oil usage.

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

(3) The annual ton per year emission limitations specified in b)(2)a. above for PE, PM10, SO2, NOx, VOC, and CO are based upon a maximum annual coal usage rate for emissions units B001, B002, and B004, combined, which shall not exceed 49,500 tons per year, based upon a rolling, 12-month summation of the monthly coal usage.

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

(4) The quality of coal received for burning in this emissions unit shall have a combination of sulfur content and heat content, on an “as-received” wet basis, which is sufficient to comply with the allowable SO2 emission limitation.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-18-04, and OAC rule 3745-18-15)

(5) The quality of the No. 2 fuel oil burned in this emissions unit shall have a combination of heat and sulfur content, on an "as-received" basis, which is sufficient to comply with the allowable SO2 emission limitation.

(Authority for term: OAC rule 3745-77-07(A)(1) andOAC rule 3745-18-15)

(6) The permittee shall comply with the applicable work practice standards, emission reduction measures, management practices, and operating limit requirements required under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:

63.11201, 63.11223, and Table 2 to Subpart JJJJJJ	general duty to minimize startup and shutdown periods and conduct startups and shutdowns according to the manufacturer's recommended procedures
63.11201 and Table 2 to Subpart JJJJJJ	one-time energy assessment requirements
63.11201 and Table 3 to Subpart JJJJJJ	applicable operating limitations
63.11211 and Table 6 to Subpart JJJJJJ	requirements for establishing operating limitations
63.11222 and Table 7 to Subpart JJJJJJ	requirements for demonstrating continuous compliance

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart JJJJJJ)

(7) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the scrubber, that must be maintained in order to demonstrate compliance, shall not be less than8 inches of water as a 3-hour rolling average.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(D), and 40 CFR Part 64)

(8) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable scrubber liquid flow rate, that shall be maintained in order to demonstrate compliance, shall not be less than the minimum water flow rate (in gallons per minute), as a 3-hour rolling average, established during the most recent emissions test that demonstrated the emissions unit to be in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(D), and 40 CFR Part 64)

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than coal 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(D))

(2) The permittee shall collect a representative sample of coal received for burning each month. The coal sampling shall be performed as follows:

On each day this emissions unit is in operation, the permittee shall collect a sample (approximately 0.33 cubic foot of coal) from the coal handling system at a point after the coal exits the crusher. The permittee shall pour the daily sample into a sample container and mix the sample with the previous days' sample(s). At the end of each week, the permittee shall again mix the sample container and collect and retain approximately 0.5 cubic foot of coal from the sample container in a sample bag. At the end of each month, the permittee shall pour each weekly sample bag into a sample container and mix the contents, then collect approximately 0.5 cubic foot of the mixed coal for laboratory testing.

Each monthly representative sample of coal shall be analyzed for sulfur content (percent), ash content (percent), and heat content (Btu/pound of coal). The analytical methods to be used to determine the ash content, sulfur content, and heat content shall be the most recent version of: ASTM method D3174, AshintheAnalysisofCoalandCoke; ASTM method D3177, TotalSulfurintheAnalysisSampleofCoalandCoke or ASTM method D4239, SulfurintheAnalysisSampleofCoalandCokeUsingHighTemperatureTubeFurnaceCombustionMethods; and ASTM method D5865 GrossCalorificValueofCoalandCoke, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(D)(9)(c)(ii), and OAC rule 3745-18-15)

(3) The permittee shall maintain monthly records of the total quantity of coal received, the results of the analyses for sulfur content, ash content, and heat content, and the calculated average SO2 emission rate for the month, in lbs/MMBtu of actual heat input. The SO2 emission rate shall be calculated by methods specified in OAC rule 3745-18-04(F)(1).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(D), and OAC rule 3745-18-15)

(4) For each shipment of oil received for burning in this emissions unit, the permittee shall 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 SO2 emission rate (in lbs/MMBtu). The SO2 emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)(2). The permittee shall collect or 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 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 and D4294), or equivalent methods as approved by the Director.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(E)(7), OAC rule 3745-18-04(I), and OAC rule 3745-18-15)

(5) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop across the scrubber (in inches of water) and the scrubber liquid flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in c)(7) and c)(8), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in c)(7) and c)(8), unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date the corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop and flow rate readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D), and 40 CFR Part 64)

(6) The permittee shall collect and record on a daily basis each period (date and total time) of downtime or bypass of the scrubber, and/or downtime of the scrubber pressure drop and/or flow rate monitoring equipment, when the associated emissions unit was in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(7) Except for, as applicable, monitoring system malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring system malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(8) The permittee shall collect and record the following information each month for emissions units B001, B002, and B004 combined:

a. the total amount of coal used, in tons per month;

b. the updated rolling, 12-month summation of coal usage, in tons (the total amount of tons for the current month plus the total amount of tons for the previous eleven calendar months);

c. the total amount of No. 2 fuel oil used, in gallons per month;

d. the updated rolling, 12-month summation of fuel oil usage, in gallons (the total amount of gallons for the current month plus the total amount of gallons for the previous eleven calendar months);

e. the total emissions, in tons, for PE, PM10, SO2, NOx, VOC, and CO for each month; and

f. the updated rolling, 12-month summation emissions total, in tons, for PE, PM10, SO2, NOx, VOC, and CO (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).

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

(9) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:

63.11224(a)	either install, operate, and maintain a CEMS for CO and oxygen; or install, operate, and maintain an oxygen analyzer system
63.11225(c)	required overall records to be maintained
63.11225(d)	record format and retention requirements

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJJJ)

(10) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissionsis the pressure drop across the scrubber and scrubber liquid flow rate.

The scrubber operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements as specified in d)(5). The scrubber indicator range is specified in c)(7). When the monitored value for pressure drop is outside of the range specified in c)(7), corrective action (including, but not limited to, an evaluation of the emissions unit and scrubber) will be required.

The scrubber operating parameters are measured and recorded by the continuous scrubber liquid flow rate monitoring equipment and the associated record keeping requirements as specified in d)(5). The scrubber indicator range is specified in c)(8). When the monitored value for scrubber liquid flow rate is outside of the range specified in c)(8), corrective action (including, but not limited to, an evaluation of the emissions unit and scrubber) will be required.

Upon detecting an excursion of the pressure drop across the scrubber and/or scrubber liquid flow rate, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial

inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(11) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(12) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(13) 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 #14-05967, issued on 11/20/2007:d)(1) – d)(12). 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) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any fuel burned in this emissions unit other than coal or No. 2 fuel oil. The notification shall include a copy of such record and shall be submitted to the Southwest Ohio Air Quality Agency within 30 days after the deviation occurs.

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

(2) The permittee shall submit quarterly reports concerning the quantity and quality of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:

a. the total quantity of coal received (tons);

b. the average ash content (percent by weight) of the coal received;

c. the average sulfur content (percent by weight) of the coal received;

d. the average heat content (Btu/pound) of the coal received; and

e. the average SO2 emissions rate (pounds SO2/MMBtu actual heat input) from the coal received.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to Southwest Ohio Air Quality Agency and shall cover the coal received during the previous calendar quarter.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(D), and OAC rule 3745-18-15)

(3) The permittee shall submit, on a quarterly basis, copies or summaries of the permittee's or oil supplie''s analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent), heat content (Btu/gallon), and SO2 emission rate (pounds/MMBtu) for each shipment of oil. The total quantity of oil received in each shipment (gallons) shall also be included with the copies or summaries of the permittee's or oil supplier's analyses.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to Southwest Ohio Air Quality Agency and shall cover the oil shipments received during the previous calendar quarter.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(E), and OAC rule 3745-18-15)

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

a. an identification of all exceedances of the rolling, 12-month coal usage limitation for emissions units B001, B002, and B004, combined, as specified in c)(3);

b. an identification of all exceedances of the rolling, 12-month No. 2 fuel oil usage limitation for emissions units B001, B002, and B004, combined, as specified in c)(2); and

c. an identification of all exceedances of the rolling, 12-month emission limitations for PE, PM10, SO2, NOx, VOC, and CO for emissions units B001, B002, and B004, combined, as specified in b)(2)a.

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(D))

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

a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber and/or the liquid flow rate was/were outside of the appropriate range or exceeded the applicable limit contained in this permit, the cause of each incident, and the corrective action(s) taken for each incident;

b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the scrubber;

c. the date, time, and duration of any downtime of the scrubber continuous monitoring equipment (other than downtime associated with required quality assurance or control activities, including, as applicable, calibration checks and required zero and span checks and adjustments) while the emissions unit was in operation, the cause of each incident, and the corrective action(s) taken for each incident;

d. each incident of deviation described in “a”, “b”, or “c” (above) where a prompt investigation was not conducted;

e. each incident of deviation described in “a”, “b”, or “c” where prompt corrective action, that would bring the emissions unit into compliance and/or the pressure drop and/or liquid flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and

f. each incident of deviation described in “a”, “b”, or “c” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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(D), and 40 CFR Part 64)

(6) If the permittee is required under 40 CFR 64.8 and d)(12) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(7) The permittee shall submit annual reports which specify the total PE, PM10, SO2, NOx, VOC, and CO emissions from this emissions unit for the previous calendar year. These

reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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

(8) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:

63.11214(b), (c), and (d) and 63.11225(a)	Notification of Compliance Status requirements
63.11225(b)	content and submission of compliance certification reports

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJJJ)

(9) 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))

(10) 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 #14-05967, issued on 11/20/2007: e)(1) – e)(9). 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. Emissions Limitation:

PE shall not exceed 0.02 pound per MMBtu of actual heat input when firing only No. 2 fuel oil.

Applicable Compliance Method:

Compliance may be determined by multiplying an emission factor of 2.0 lbs of PE/1000 gallons of oil fired by the emissions unit's maximum hourly fuel oil firing capacity (in 1000 gallons/hr) and dividing by the emissions unit's rated heat input capacity (95 MMBtu/hr). This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (5/10).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-10(B)(1))

b. Emissions Limitation:

SO2 emissions shall not exceed 1.4 lbs/MMBtu.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above SO2 emission limitation based on the monitoring and record keeping requirements in d)(2), d)(3), and d)(4) and the reporting requirements in e)(2) and e)(3) of this permit. The SO2 emission rate shall be calculated pursuant to the equations specified in OAC rule 3745-18-04(F). When multiple fuels are burned, the SO2 emission rate is the sum of SO2 from all fuels burned divided by the sum of the Btu value of all fuels burned.

If required, the permittee shall demonstrate compliance with this emission limitation 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, and OAC rule 3745-18-15)

c. Emissions Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Test Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

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)(a), and OAC rule 3745-17-07(A))

d. Emissions Limitation:

The emissions from emissions units B001, B002, and B004, combined, shall not exceed the following based upon rolling, 12-month summations of the monthly emissions:

38.02 TPY of PE;

38.03 TPY of PM10;

896.62 TPY of SO2;

545.70 TPY of NOx;

1.50 TPY of VOC; and

12.63 TPY of CO.

Applicable Compliance Method:

Compliance with the VOC, NOx, and CO emission limitations specified above shall be determined by the record keeping requirements specified in d)(8) and the pollutant-specific emission factors specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 1 External Combustion Sources, Sections 1.1 (9/98) and 1.3 (5/10). Compliance with the SO2 emission limitation specified above shall be determined by the record keeping requirements specified in d)(3), d)(4), and d)(8). Compliance with the PE and PM10 emission limitations specified above shall be determined by the record keeping requirements specified in d)(8) and emission testing required in f)(1)e. of this permit.

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

e. Emissions Limitation:

When burning coal: 0.06 pound of PE/PM10 per MMBtu of actual heat input.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted within 6 months following the effective date of this permit and within 6 months prior to permit expiration.

ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of 0.06 lb of PE/PM10 per MMBtu of actual heat input, when burning coal.

iii. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate:

40 CFR Part 60, Appendix A, Methods 1 through 5; and

40 CFR Part 51, Appendix M, Method 201 or 201A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

If the permittee demonstrates to the Southwest Ohio Air Quality Agency that Methods 201, 201A, and/or 202 for determination of PM10 emissions is not technically feasible due to the stack conditions of this emissions unit, the permittee shall demonstrate compliance with the PM10 allowable mass emission rate through the appropriate PM10 emission factors based on U.S. EPA AP-42 guidance documents.

iv. During the test, the pressure drop across the scrubber and scrubber liquid flow rate shall be recorded at least every 15 minutes.

v. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

vi. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

vii. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

viii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where

warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D), and 40 CFR Part 64)

(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 #14-05967, issued on 11/20/2007: f)(1). 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. B004, Boiler No. 4 (MHI)

Operations, Property and/or Equipment Description:

Boiler No. 4 - 174 MMBtu/hr pulverized coal/oil-fired boiler with multiclone and scrubber

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(D) (PTI 14-05967, issued 11/20/2007) *Voluntary Restriction to Avoid Non-Attainment New Source Review and Prevention of Significant Deterioration*	Particulate emissions (PE) and particulate matter 10 microns and less in diameter (PM10) emissions shall not exceed 0.06 pound per MMBtu of actual heat input when burning coal. See b)(2)a., b)(2)b., c)(2), and c)(3).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.02 pound per MMBtu of actual heat input when burning only No. 2 fuel oil.
d.	OAC rule 3745-17-10(C)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
e.	OAC rule 3745-18-15(F)	Sulfur dioxide (SO2) emissions shall not exceed 1.4 pounds per MMBtu of actual heat input. See b)(2)c.
f.	40 CFR Part 63, Subpart JJJJJJ (40 CFR 63.11193-11237) National Emission Standards for	Applicable Emission Limits in Table 1; Work Practice Standards, Emission Reduction Measures, and Management Practices in Table 2; and Operating Limits

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources [In accordance with 40 CFR 63.11200 and 63.11237, this emissions unit is an existing pulverized coal and oil-fired boiler subject to the coal subcategory requirements as defined in this subpart. The permittee shall comply with the emission limitations and operating limitations specified in this section.]	in Table 3 to Subpart JJJJJJ of 40 CFR Part 63. See b)(2)e. and c)(6). Pursuant to 40 CFR 63.11196(a), the permittee shall comply with this subpart no later than March 21, 2014.
g.	40 CFR 63.1-15 (40 CFR 63.11235)	Table 8 to 40 CFR Part 63, Subpart JJJJJJ – Applicability of General Provisions (Subpart A) to Subpart JJJJJJ shows which parts of the General Provisions in 40 CFR 63.1-15 apply.
h.	40 CFR Part 64 (40 CFR 64.1-10) Compliance Assurance Monitoring (CAM)	See b)(2)f., c)(7), c)(8), d)(5), d)(6), d)(7), d)(10), d)(11), d)(12), e)(5), and e)(6).

(2) Additional Terms and Conditions

a. The emissions from emissions units B001 (Boiler No. 1 - 95 MMBtu/hr pulverized coal/oil-fired boiler with multiclone and scrubber), B002 (Boiler No. 2 - 95 MMBtu/hr pulverized coal/oil-fired boiler with multiclone and scrubber), and B004 (Boiler No. 4 - 174 MMBtu/hr pulverized coal/oil-fired boiler with multiclone and scrubber), combined, shall not exceed:

i. 38.02 tons per year of PE, based upon a rolling, 12-month summation of the monthly emissions;

ii. 38.03 tons per year of PM10, based upon a rolling, 12-month summation of the monthly emissions;

iii. 896.62 tons per year of SO2, based upon a rolling, 12-month summation of the monthly emissions;

iv. 545.70 tons per year of nitrogen oxides (NOx) emissions, based upon a rolling, 12-month summation of the monthly emissions;

v. 1.50 tons per year of volatile organic compound (VOC) emissions, based upon a rolling, 12-month summation of the monthly emissions; and

vi. 12.63 tons per year of carbon monoxide (CO) emissions, based upon a rolling, 12-month summation of the monthly emissions.

b. The permittee shall operate the multiclone and venturi scrubber at all times when this emissions unit is in operation.

c. This emissions unit shall be vented to a stack no lower than two hundred feet above ground level.

d. Compliance with OAC rule 3745-31-05(D) shall be demonstrated by the emission limitations, the use of multiclone and scrubber control equipment, and annual fuel usage restrictions.

e. The permittee shall comply with the applicable emission limits required under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:

63.11201 and Table 1 to Subpart JJJJJJ	Mercury emissions shall not exceed 2.2 E-05 pound per MMBtu of heat input.
63.11201 and Table 1 to Subpart JJJJJJ	Carbon monoxide (CO) emissions shall not exceed 420 ppm by volume on a dry basis corrected to 3 percent oxygen.

f. At all times, the permittee shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

c) Operational Restrictions

(1) The permittee shall burn only coal 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(D))

(2) The maximum annual No. 2 fuel oil usage for emissions units B001, B002, and B004, combined, shall not exceed 100,000 gallons per year, based upon a rolling, 12-month summation of the monthly fuel oil usage.

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

(3) The annual ton per year emission limitations specified in b)(2)a. above for PE, PM10, SO2, NOx, VOC, and CO are based upon a maximum annual coal usage rate for emissions units B001, B002, and B004, combined, which shall not exceed 49,500 tons per year, based upon a rolling, 12-month summation of the monthly coal usage.

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

(4) The quality of coal received for burning in this emissions unit shall have a combination of sulfur content and heat content, on an "as-received" wet basis, which is sufficient to comply with the allowable SO2 emission limitation.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-18-04, and OAC rule 3745-18-15)

(5) The quality of the No. 2 fuel oil burned in this emissions unit shall have a combination of heat and sulfur content, on an "as-received" basis, which is sufficient to comply with the allowable SO2 emission limitation.

(Authority for term: OAC rule 3745-77-07(A)(1) andOAC rule 3745-18-15)

(6) The permittee shall comply with the applicable work practice standards, emission reduction measures, management practices, and operating limit requirements required under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:

63.11201, 63.11223, and Table 2 to Subpart JJJJJJ	general duty to minimize startup and shutdown periods and conduct startups and shutdowns according to the manufacturer's recommended procedures
63.11201 and Table 2 to Subpart JJJJJJ	one-time energy assessment requirements
63.11201 and Table 3 to Subpart JJJJJJ	applicable operating limitations
63.11211 and Table 6 to Subpart JJJJJJ	requirements for establishing operating limitations
63.11222 and Table 7 to Subpart JJJJJJ	requirements for demonstrating continuous compliance

(Authority for term: OAC rule 3745-77-07(A)(1) and 40 CFR Part 63, Subpart JJJJJJ)

(7) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable pressure drop across the scrubber, that must be maintained in order to demonstrate compliance, shall not be less than8 inches of water as a 3-hour rolling average.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(D), and 40 CFR Part 64)

(8) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable scrubber liquid flow rate, that shall be maintained in order to demonstrate compliance, shall not be less than the minimum water flow rate (in gallons per minute), as a 3-hour rolling average, established during the most recent emissions test that demonstrated the emissions unit to be in compliance.

(Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(D), and 40 CFR Part 64)

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than coal 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(D))

(2) The permittee shall collect a representative sample of coal received for burning each month. The coal sampling shall be performed as follows:

On each day this emissions unit is in operation, the permittee shall collect a sample (approximately 0.33 cubic foot of coal) from the coal handling system at a point after the coal exits the crusher. The permittee shall pour the daily sample into a sample container and mix the sample with the previous days' sample(s). At the end of each week, the permittee shall again mix the sample container and collect and retain approximately 0.5 cubic foot of coal from the sample container in a sample bag. At the end of each month, the permittee shall pour each weekly sample bag into a sample container and mix the contents, then collect approximately 0.5 cubic foot of the mixed coal for laboratory testing.

Each monthly representative sample of coal shall be analyzed for sulfur content (percent), ash content (percent), and heat content (Btu/pound of coal). The analytical methods to be used to determine the ash content, sulfur content, and heat content shall be the most recent version of: ASTM method D3174, AshintheAnalysisofCoalandCoke; ASTM method D3177, TotalSulfurintheAnalysisSampleofCoalandCoke or ASTM method D4239, SulfurintheAnalysisSampleofCoalandCokeUsingHighTemperatureTubeFurnaceCombustionMethods; and ASTM method D5865 GrossCalorificValueofCoalandCoke, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(D)(9)(c)(ii), and OAC rule 3745-18-15)

(3) The permittee shall maintain monthly records of the total quantity of coal received, the results of the analyses for sulfur content, ash content, and heat content, and the calculated average SO2 emission rate for the month, in lbs/MMBtu of actual heat input. The SO2 emission rate shall be calculated by methods specified in OAC rule 3745-18-04(F)(1).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(D), and OAC rule 3745-18-15)

(4) For each shipment of oil received for burning in this emissions unit, the permittee shall 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 SO2 emission rate (in lbs/MMBtu). The SO2 emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)(2). The permittee shall collect or 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 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 and D4294), or equivalent methods as approved by the Director.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(E)(7), OAC rule 3745-18-04(I), and OAC rule 3745-18-15)

(5) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the pressure drop across the scrubber (in inches of water) and the scrubber liquid flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in c)(7) and c)(8), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in c)(7) and c)(8), unless the permittee determines that corrective action is not necessary and

documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

f. a description of the corrective action;

g. the date the corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop and flow rate readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D), and 40 CFR Part 64)

(6) The permittee shall collect and record on a daily basis each period (date and total time) of downtime or bypass of the scrubber, and/or downtime of the scrubber pressure drop and/or flow rate monitoring equipment, when the associated emissions unit was in operation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(7) Except for, as applicable, monitoring system malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring system malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of 40 CFR Part 64, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring system malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring system failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(8) The permittee shall collect and record the following information each month for emissions units B001, B002, and B004 combined:

a. the total amount of coal used, in tons per month;

b. the updated rolling, 12-month summation of coal usage, in tons (the total amount of tons for the current month plus the total amount of tons for the previous eleven calendar months);

c. the total amount of No.2 fuel oil used, in gallons per month;

d. the updated rolling, 12-month summation of fuel oil usage, in gallons (the total amount of gallons for the current month plus the total amount of gallons for the previous eleven calendar months);

e. the total emissions, in tons, for PE, PM10, SO2, NOx, VOC, and CO for each month; and

f. the updated rolling, 12-month summation emissions total, in tons, for PE, PM10, SO2, NOx, VOC, and CO (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).

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

(9) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:

63.11224(a)	either install, operate, and maintain a CEMS for CO and oxygen; or install, operate, and maintain an oxygen analyzer system
63.11225(c)	required overall records to be maintained
63.11225(d)	record format and retention requirements

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJJJ)

(10) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicator for particulate emissionsis the pressure drop across the scrubber and scrubber liquid flow rate.

The scrubber operating parameters are measured and recorded by the continuous pressure drop monitoring equipment and the associated record keeping requirements as specified in d)(5). The scrubber indicator range is specified in c)(7). When the monitored value for pressure drop is outside of the range specified in c)(7), corrective action (including, but not limited to, an evaluation of the emissions unit and scrubber) will be required.

The scrubber operating parameters are measured and recorded by the continuous scrubber liquid flow rate monitoring equipment and the associated record keeping requirements as specified in d)(5). The scrubber indicator range is specified in c)(8). When the monitored value for scrubber liquid flow rate is outside of the range specified

in c)(8), corrective action (including, but not limited to, an evaluation of the emissions unit and scrubber) will be required.

Upon detecting an excursion of the pressure drop across the scrubber and/or scrubber liquid flow rate, the permittee shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for Term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(11) If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring under 40 CFR Part 64 did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the appropriate Ohio EPA District Office or local air agency and if necessary, submit a proposed modification to the Title V permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, re-establishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. Approved revisions to the monitoring will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(12) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(13) 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 #14-05967, issued on 11/20/2007:d)(1) – d)(12). 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) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any fuel burned in this emissions unit other than coal or No. 2 fuel oil. The notification shall include a copy of such record and shall be submitted to the Southwest Ohio Air Quality Agency within 30 days after the deviation occurs.

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

(2) The permittee shall submit quarterly reports concerning the quantity and quality of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:

a. the total quantity of coal received (tons);

b. the average ash content (percent by weight) of the coal received;

c. the average sulfur content (percent by weight) of the coal received;

d. the average heat content (Btu/pound) of the coal received; and

e. the average SO2 emissions rate (pounds SO2/MMBtu actual heat input) from the coal received.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to Southwest Ohio Air Quality Agency and shall cover the coal received during the previous calendar quarter.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(D), and OAC rule 3745-18-15)

(3) The permittee shall submit, on a quarterly basis, copies or summaries of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent), heat content (Btu/gallon), and SO2 emission rate (pounds/MMBtu) for each shipment of oil. The total quantity of oil received in each shipment (gallons) shall also be included with the copies or summaries of the permittee's or oil supplier's analyses.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year to Southwest Ohio Air Quality Agency and shall cover the oil shipments received during the previous calendar quarter.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-04(E), and OAC rule 3745-18-15)

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

a. an identification of all exceedances of the rolling, 12-month coal usage limitation for emissions units B001, B002, and B004, combined, as specified in c)(3);

b. an identification of all exceedances of the rolling, 12-month No. 2 fuel oil usage limitation for emissions units B001, B002, and B004, combined, as specified in c)(2); and

c. an identification of all exceedances of the rolling, 12-month emission limitations for PE, PM10, SO2, NOx, VOC, and CO for emissions units B001, B002, and B004, combined, as specified in b)(2)a.

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(D))

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

a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber and/or the liquid flow rate was/were outside of the appropriate range or exceeded the applicable limit contained in this permit, the cause of each incident, and the corrective action(s) taken for each incident;

b. any period of time (start time and date, and end time and date) when the emissions unit was in operation and the process emissions were not vented to the scrubber;

c. the date, time, and duration of any downtime of the scrubber continuous monitoring equipment (other than downtime associated with required quality assurance or control activities, including, as applicable, calibration checks and required zero and span checks and adjustments) while the emissions unit was in operation, the cause of each incident, and the corrective action(s) taken for each incident;

d. each incident of deviation described in “a”, “b”, or “c” (above) where a prompt investigation was not conducted;

e. each incident of deviation described in “a”, “b”, or “c” where prompt corrective action, that would bring the emissions unit into compliance and/or the pressure drop and/or liquid flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and

f. each incident of deviation described in “a”, “b”, or “c” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

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(D), and 40 CFR Part 64)

(6) If the permittee is required under 40 CFR 64.8 and d)(12) of this permit to develop a QIP, the permittee shall submit quarterly reports that contain a description of the actions taken to implement a QIP during the reporting period. Upon completion of a QIP, the permittee shall include documentation that the implementation of the plan has been completed and reduced the likelihood of excursions.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

(7) The permittee shall submit annual reports which specify the total PE, PM10, SO2, NOx, VOC, and CO emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

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

(8) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart JJJJJJ, including the following sections:

63.11214(b), (c), and (d) and 63.11225(a)	Notification of Compliance Status requirements
63.11225(b)	content and submission of compliance certification reports

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJJJ)

(9) 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))

(10) 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 #14-05967, issued on 11/20/2007: e)(1) – e)(9). 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 Limitation:

PE shall not exceed 0.02 pound per MMBtu of actual heat input when firing only No. 2 fuel oil.

Applicable Compliance Method:

Compliance may be determined by multiplying an emission factor of 2.0 lbs of PE/1000 gallons of oil fired by the emissions unit's maximum hourly fuel oil firing capacity (in 1000 gallons/hr) and dividing by the emissions unit's rated heat input capacity (174 MMBtu/hr). This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (5/10).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-10(B)(1))

b. Emission Limitation:

SO2 emissions shall not exceed 1.4 lbs/MMBtu.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above SO2 emission limitation based on the monitoring and record keeping requirements in d)(2), d)(3), and d)(4) and the reporting requirements in e)(2) and e)(3) of this permit. The SO2 emission rate shall be calculated pursuant to the equations specified in OAC rule 3745-18-04(F). When multiple fuels are burned, the SO2 emission rate is the sum of SO2 from all fuels burned divided by the sum of the Btu value of all fuels burned.

If required, the permittee shall demonstrate compliance with this emission limitation 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, and OAC rule 3745-18-15)

c. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the visible particulate emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Test Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

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), OAC rule 3745-17-03(B)(1)(a), and OAC rule 3745-17-07(A))

d. Emission Limitations:

The emissions from emissions units B001, B002, and B004, combined, shall not exceed the following based upon rolling, 12-month summations of the monthly emissions:

38.02 TPY of PE;

38.03 TPY of PM10;

896.62 TPY of SO2;

545.70 TPY of NOx;

1.50 TPY of VOC; and

12.63 TPY of CO.

Applicable Compliance Method:

Compliance with the VOC, NOx, and CO emission limitations specified above shall be determined by the record keeping requirements specified in d)(8) and the pollutant-specific emission factors specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 1 External Combustion Sources, Sections 1.1 (9/98) and 1.3 (5/10). Compliance with the SO2 emission limitation specified above shall be determined by the record keeping requirements specified in d)(3), d)(4), and d)(8). Compliance with the PE and PM10 emission limitations specified above shall be determined by the record keeping requirements specified in d)(8) and emission testing required in f)(1)e. of this permit.

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

e. Emission Limitation:

When burning coal: 0.06 pound of PE/PM10 per MMBtu of actual heat input.

Applicable Compliance Method:

The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

i. The emission testing shall be conducted within 6 months following the effective date of this permit and within 6 months prior to permit expiration.

ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of 0.06 lb of PE/PM10 per MMBtu of actual heat input, when burning coal.

iii. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate:

40 CFR Part 60, Appendix A, Methods 1 through 5; and

40 CFR Part 51, Appendix M, Method 201 or 201A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

If the permittee demonstrates to the Southwest Ohio Air Quality Agency that Methods 201, 201A, and/or 202 for determination of PM10 emissions is not technically feasible due to the stack conditions of this emissions unit, the permittee shall demonstrate compliance with the PM10 allowable mass emission rate through the appropriate PM10 emission factors based on U.S. EPA AP-42 guidance documents.

iv. During the test, the pressure drop across the scrubber and scrubber liquid flow rate shall be recorded at least every 15 minutes.

v. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.

vi. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall

describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

vii. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

viii. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(D), and 40 CFR Part 64)

(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 #14-05967, issued on 11/20/2007: f)(1). 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.

4. F002, Ash Handling (MHI)

Operations, Property and/or Equipment Description:

Ash Handling (MHI)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(B)(6)	There shall be no visible emissions of fugitive dust from the fly ash storage piles except for a period of time not to exceed 13 minutesduring any 60-minute observation period.
b.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a. through b)(2)e.

(2) Additional Terms and Conditions

a. The permittee shall employ reasonably available control measures on all load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee has committed to treat the fly ash with water, maintain minimal drop heights for stackers and front-loaders, and chemical stabilization/dust suppressants and/or watering/sprinkling systems at sufficient treatment frequencies to ensure compliance. The operator shall avoid dragging any front-end loader bucket along the ground. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

b. The above-mentioned control measure(s) shall be employed for each load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-

mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.

c. The permittee shall employ reasonably available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the application, the permittee has committed to perform one or more of the following: (chemical stabilization, watering/sprinkling systems/hoses, covering the storage piles) to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

d. The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

e. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

storage pile identification	minimum load-out inspection frequency
fly ash storage piles	weekly

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(6), and OAC rule 3745-17-08(B))

(2) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

storage pile identification	minimum wind erosion inspection frequency
fly ash storage piles	weekly

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(6), and OAC rule 3745-17-08(B))

(3) No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(6), and OAC rule 3745-17-08(B))

(4) The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(6), and OAC rule 3745-17-08(B))

(5) The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in d)(5)d. shall be kept separately for (i) the load-out operations and (ii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(6), and OAC rule 3745-17-08(B))

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify any of the following:

a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

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 3745-17-07(B)(6), and OAC rule 3745-17-08(B))

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

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

f) Testing Requirements

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

a. Emission Limitation:

There shall be no visible emissions of fugitive dust from the fly ash storage piles except for a period of time not to exceed 13 minutesduring any 60-minute observation period.

Applicable Compliance Method:

Compliance with the visible emission limitation for fugitive dust from the fly ash storage piles identified in this permit shall be determined in accordance with U.S. EPA Method 22 and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(6), and OAC rule 3745-17-03(B)(4))

g) Miscellaneous Requirements

(1) None.

5. F003, Coal Handling (MHI)

Operations, Property and/or Equipment Description:

Coal Handling System, Coal Storage Unloading/Conveying System

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
(Coal unloading, coal conveyors, coal handling, coal crusher, and coal transfer points)		
a.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust from material handling operations shall not exceed twenty percent opacity as a three-minute average.
b.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)a. through b)(2)f. and b)(2)i.
(Coal storage piles)		
c.	OAC rule 3745-17-07(B)(6)	There shall be no visible emissions of fugitive dust from the coal storage piles except for a period of time not to exceed 13 minutesduring any 60-minute observation period.
d.	OAC rule 3745-17-08(B)	Reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust. See b)(2)g., b)(2)h., and b)(2)i.

(2) Additional Terms and Conditions

a. The material handling operation(s) that are covered by this permit and subject to the following requirements are listed below:

i. coal unloading, coal conveyors, coal handling, coal crusher, and coal transfer points.

b. The permittee shall employ reasonably available control measures for the above-identified material handling operation(s) in b)(2)a. for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to perform the following control measure(s) to ensure compliance:

i. water and/or suitable dust suppression chemicals.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

c. For each material handling operation that is not adequately enclosed, the above-identified control measure(s) shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) is (are) necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during the operation of the material handling operation(s) until further observation confirms that use of the control measure(s) is unnecessary.

d. The permittee shall employ a two-sided enclosure around the coal unloading station in order to minimize or eliminate fugitive dust emissions.

e. The permittee shall employ and maintain the building enclosure around the coal crusher in order to minimize or eliminate fugitive dust emissions.

f. The permittee shall employ and maintain total enclosure of all conveyor transfer points in order to minimize or eliminate fugitive dust emissions.

g. The permittee shall either employ a wind guard enclosure and/or shall continue to employ the embankment to minimize fugitive dust emissions from the surfaces of the coal storage pile(s) due to wind loss. If the embankment is used to minimize fugitive dust emissions due to wind loss, the height of the coal storage pile shall not exceed the height of the embankment. Nothing in this paragraph shall prohibit the permittee from employing additional control measures to ensure compliance.

h. The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be

necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

i. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) For each material processing and handling operation that is not adequately enclosed, the permittee shall perform inspections of such material processing and handling operations in accordance with the following minimum frequencies in order to determine if control measures need to be implemented:

material handling operation(s)	minimum inspection frequency
all operations	once during each day of operation

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance. The inspections shall be performed during representative, normal operating conditions.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B))

(2) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each coal storage pile in accordance with the following frequencies:

storage pile identification	minimum wind erosion inspection frequency
all	daily

The purpose of the inspections is to determine if the embankment is sufficient, and to determine the need for implementing the control measures specified in this permit for wind erosion from the surface of a coal storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(6), and OAC rule 3745-17-08(B))

(3) No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not

performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(6), and OAC rule 3745-17-08(B))

(4) The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned frequencies for performing the visible emissions checks if operating experience indicates that less frequent visible emissions checks would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified inspection frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(3) of OAC rule 3745-77-08.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B))

(5) The permittee shall maintain records of the following information for the material processing and handling operations:

a. the date and reason any required inspection was not performed;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented.

The information in d)(5)d. shall be kept separately for each material handling operation identified above in b)(2)a., and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), and OAC rule 3745-17-08(B))

(6) The permittee shall maintain records of the following information for the coal storage piles:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in d)(6)d. shall be kept for the coal storage pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(6), and OAC rule 3745-17-08(B))

e) Reporting Requirements

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

a. each day during which an inspection of the material processing and handling operations was not performed by the required frequency; and

b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

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 3745-17-07(B), and OAC rule 3745-17-08(B))

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

a. each day during which an inspection of the coal storage piles was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

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 3745-17-07(B)(6), and OAC rule 3745-17-08(B))

(3) 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))

f) Testing Requirements

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

a. Emission Limitation:

There shall be no visible emissions of fugitive dust from the coal storage piles except for a period of time not to exceed 13 minutesduring any 60-minute observation period.

Applicable Compliance Method:

Compliance with the visible emission limitation for fugitive dust from the coal storage piles identified in this permit shall be determined in accordance with U.S. EPA Method 22 and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(6), and OAC rule 3745-17-03(B)(4))

b. Emission Limitation:

Visible emissions of fugitive dust from material handling operations shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

Compliance with the visible emissions limitation for fugitive dust from material handling operations shall be determined through visible emissions observations performed in accordance U.S. EPA Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B)(1), and OAC rule 3745-17-03(B)(3))

g) Miscellaneous Requirements

(1) None.

6. F101, Roadways and Parking Areas (BWP)

Operations, Property and/or Equipment Description:

Paved and Unpaved Roadways and Parking Areas (BWP)

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 14-04628, issued 10/12/2000)	Particulate emissions (PE) from roadways and parking areas shall not exceed 8.31 tons per year (TPY). Particulate matter 10 microns and less in diameter (PM10) emissions from roadways and parking areas shall not exceed 2.23 tons per year (TPY). See b)(2)c. through b)(2)j. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(B) and OAC rule 3745-17-08(B).
b.	OAC rule 3745-17-07(B)	See b)(2)a. and b)(2)b.
c.	OAC rule 3745-17-08(B)	See b)(2)d., b)(2)e., b)(2)f., and b)(2)i.

(2) Additional Terms and Conditions

a. There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period.

b. There shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.

c. All paved roadways and parking areas shall be flushed with water to minimize or eliminate, at all times, visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitation.

d. The permittee shall promptly remove, in such a manner as to minimize or prevent re-suspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

e. The unpaved shoulders of all paved roadways shall be treated with water and/or any other suitable dust suppression chemicals to minimize or eliminate, at all times, visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitation.

f. The permittee shall employ reasonably available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance with the visible emission limitation. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

g. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for an unpaved or paved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

h. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled using appropriate dust control measures for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas specified in OAC rule 3745-17-07(B)(4).

i. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary to minimize or eliminate visible emissions of fugitive dust.

j. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

k. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations, visible emission limitations, and use of reasonably available control measures (RACM) to minimize or eliminate visible emissions of fugitive dust.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, the permittee shall perform inspections of the unpaved and paved roadways and parking areas in accordance with the following frequencies:

unpaved and paved roadways	minimum inspection frequency
all	daily, excluding weekends or holidays

unpaved and paved parking areas	minimum inspection frequency
all	daily, excluding weekends or holidays

The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

The permittee may, upon receipt of written approval from the Southwest Ohio Air Quality Agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified inspection frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(3) of OAC rule 3745-77-08.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), OAC rule 3745-17-08(B), and OAC rule 3745-31-05(A)(3))

(2) The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in d)(2)d. shall be kept separately for (i) the unpaved and paved roadways and (ii) the unpaved and paved parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-07(B), OAC rule 3745-17-08(B), and OAC rule 3745-31-05(A)(3))

(3) 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 #14-04628, issued on 10/12/2000:d)(1) and d)(2). 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) The permittee shall submit deviation reports that identify any of the following occurrences:

a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and

b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.

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 3745-17-07(B), OAC rule 3745-17-08(B), and OAC rule 3745-31-05(A)(3))

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

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

(3) 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 #14-04628, issued on 10/12/2000: e)(1) and e)(2). 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 Limitation:

Particulate emissions (PE) from paved and unpaved roadways and parking areas shall not exceed 8.31 tons per year (TPY).

Applicable Compliance Method:

The annual PE limitation is based on permittee-supplied information in PTI application 14-04628 as submitted on July 29, 1998, AP-42 Section 13.2.1 for Paved Roads, and AP-42 Section 13.2.2 for Unpaved Roads.

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

b. Emission Limitation:

Particulate matter 10 microns and less in diameter (PM10) emissions from roadways and parking areas shall not exceed 2.23 tons per year (TPY).

Applicable Compliance Method:

The annual PM10 emission limitation is based on permittee-supplied information in PTI application 14-04628 as submitted on July 29, 1998, AP-42 Section 13.2.1 for Paved Roads, and AP-42 Section 13.2.2 for Unpaved Roads.

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

c. Emission Limitation:

There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period.

Applicable Compliance Method:

Compliance with the visible emission limitation for fugitive dust from the paved roadways and/or parking areas identified in this permit shall be determined in accordance with U.S. EPA Method 22 and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(4), and OAC rule 3745-17-07(B))

d. Emission Limitation:

There shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period.

Applicable Compliance Method:

Compliance with the visible emissions limitation for fugitive dust from the unpaved roadways and/or parking areas identified in this permit shall be determined in accordance with U.S. EPA Method 22 and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(4), and OAC rule 3745-17-07(B))

(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 #14-04628, issued on 10/12/2000: f)(1). 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.

7. P101, Paper Machine No.1 (BWP)

Operations, Property and/or Equipment Description:

Paper Machine No.1

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) g)(1).

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 P0115882, issued 2/13/2014)	Volatile organic compound (VOC) emissions shall not exceed 3.57pounds per hour*, excluding off-line wire & felt cleaning and drying hoods. The drying hoods on this emissions unit shall not exceed the following emission limitations: When burning natural gas, 2.88 pounds of carbon monoxide (CO) per hour*, 3.43 pounds of nitrogen oxides (NOx) per hour*, and 0.19 pound of VOC per hour*. When burning LPG (propane), 1.22 pounds of CO per hour*, 7.27 pounds of nitrogen oxides (NOx) per hour*, and 0.11 pound of VOC per hour*. When burning any combination of natural gas or LPG, 12.62 tons per year (TPY) of CO emissions*. *The hourly and annual emission limitations outlined above are based on the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with these limitations.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a.i. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) *Voluntary Restriction to Avoid Non-Attainment New Source Review and Prevention of Significant Deterioration*	See b)(2)a.ii., b)(2)b., b)(2)c., c)(2), and c)(3).
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack associated with this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO2) emissions shall not exceed 194.7 pounds per hour. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), as effective 11/30/2001.
e.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	The drying hoods on this emissions unit shall not exceed the following emission limitations: When burning natural gas, 0.02 pound of sulfur dioxide (SO2) per hour*, 0.07 pound of particulate emissions (PE) per hour*, and 0.26 pound of particulate matter 10 microns and less in diameter (PM10) per hour*. When burning LPG (propane), 0.01 pound of SO2 per hour*, 0.23 pound of PE per hour*, and 0.42 pound of PM10 per hour*. When burning any combination of natural gas or LPG, 0.09 ton per year (TPY) of SO2 emissions*. *The hourly and annual emission limitations outlined above are based on

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with these limitations. See b)(2)e. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-31-05(D).
f.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/2006	See b)(2)f.

(2) Additional Terms and Conditions

a. The maximum total emissions from emissions units P101 and P102, combined, shall not exceed the following emission limitations from off-line wire and felt cleaning operations:

i. 325 pounds of VOC per hour*; and

ii. 39 TPY of VOC, based upon a rolling, 12-month summation.

*The hourly emission limitation outlined above is based on the potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limitation.

b. The maximum total emissions from emissions units P101 and P102, combined, excluding drying hoods and off-line wire/felt cleaning, shall not exceed the following emission limitation based upon a rolling, 12-month summation:

21.98 TPY of VOC.

c. The maximum total annual emissions from the drying hoods on emissions units P101 and P102, combined, when burning any combination of natural gas or LPG, shall not exceed the following emission limitations based upon a rolling, 12-month summation:

1.07 TPY of PE;

2.59 TPY of particulate matter 10 microns and less in diameter (PM10);

39.9 TPY of NOx; and

1.47 TPY of VOC.

d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations and the use of natural gas and/or propane.

e. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

f. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO2, PE, and PM10 emissions from the drying hoods of this air contaminant source since the uncontrolled potential to emit for SO2, PE, and PM10 is each less than 10 tons per year (TPY).

c) Operational Restrictions

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

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

(2) The maximum annual VOC input, as applied, of liquid organic materials employed by the off-line wire and felt cleaning operations in emissions units P101 and P102, combined, shall not exceed 39 tons per year as a rolling, 12-month summation. The VOC input shall be determined by multiplying the gallons of liquid organic materials employed per month by the VOC content of each liquid organic material (see record keeping requirements in d)(2)).

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

(3) The maximum annual processing rate for emissions units P101 and P102, combined, shall not exceed 145,845 TPY, based upon a rolling, 12-month summation of machine dried tons of paper (MDTP).

(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) For each day during which the permittee burns a fuel other than natural gas or LPG, 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))

(2) The permittee shall collect and record the following information each month for emissions units P101 and P102, combined, from the off-line wire and felt cleaning operations:

a. the name and identification of each solvent employed;

b. the VOC content of each solvent employed, in pounds per gallon;

c. the number of gallons of each solvent employed;

d. the monthly VOC input (the summation of the results of the value from line b. multiplied by the value from line c. for each liquid organic material employed);

e. the updated rolling, 12-month summation total, in tons, of VOC input (the total amount of VOC input for the current month recorded in line d. plus the total amount of VOC input for the previous eleven calendar months); and

f. the updated rolling, 12-month summation total, in tons, of VOC emissions (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months), assuming 100 percent of VOC input value from line e. is emitted to the air.

(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 collect and record the following information each month for emissions units P101 and P102, combined, excluding off-line wire and felt cleaning and the drying hoods:

a. the total amount of machine dried tons of paper (MDTP), in tons per month;

b. the updated rolling, 12-month summation of MDTP, in tons (the total amount of tons for the current month plus the total amount of tons for the previous eleven calendar months);

c. the total emissions, in tons, of VOC calculated by the following equation:

E = [(MDTP/month for emissions unit P101 x 0.2188 lb of VOC/MDTP*) + (MDTP/month for emissions unit P102 x 0.5069 lb of VOC/MDTP*)]/2000,

where E = Emission Rate(tons per month).

*the emission factors established during the most recent emission test for these emissions units (October 20-23, 2009).

d. the updated rolling, 12-month summation emissions total, in tons, of VOC (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar 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))

(4) The permittee shall collect and record the following information each month for emissions units P101 and P102:

a. the combined amount of LPG used in the drying hoods associated with emissions units P101 and P102, in gallons per month;

b. the combined amount of natural gas used in the drying hoods associated with emissions units P101 and P102, in cubic feet per month;

c. the monthly combined PE, PM10, NOx, and VOC emissions from the drying hoods associated with emissions units P101 and P102; and

d. the updated, rolling, 12-month summation of PE, PM10, VOC and NO_x emissions from the drying hoods associated with emissions units P101 and P102 combined (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar 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))

(5) 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 #P0115882, issued on 2/13/2014:d)(1) – d)(4). 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) 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 LPG (propane). The notification shall include a copy of such record and shall be submitted to the Southwest Ohio Air Quality Agency within 30 days after the deviation occurs.

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

(2) The permittee shall submit annual reports that specify the total VOC and NOx emissions from this emissions unit for the calendar year. These reports shall be submitted by April

15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

(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 submit quarterly deviation (excursion) reports that identify the following:

a. an identification of all exceedances of the rolling, 12-month VOC input operational restriction for the off-line wire and felt cleaning operations on emissions units P101 and P102, combined, as specified in c)(2);

b. an identification of all exceedances of the rolling, 12-month emission limitation for VOC from the off-line wire and felt cleaning operations on emissions units P101 and P102, combined, as specified in b)(2)a.ii.;

c. an identification of all exceedances of the rolling, 12-month MDTP operational restriction for emissions units P101 and P102, combined, as specified in c)(3);

d. an identification of all exceedances of the rolling, 12-month emission limitation for VOC for emissions units P101 and P102, combined, (excluding drying hoods and off-line wire/felt cleaning operations), as specified in b)(2)b.*;* and

e. an identification of all exceedances of the rolling, 12-month emission limitations for PE, PM10, VOC, and NOx from the drying hoods on emissions units P101 and P102, combined, when burning any combination of natural gas or LPG, as specified in b)(2)c*.*

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))

(4) 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))

(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 #P0115882, issued on 2/13/2014: 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 Limitation:

VOC emissions shall not exceed 3.57 pounds per hour, excluding off-line wire & felt cleaning and drying hoods.

Applicable Compliance Method:

The hourly VOC emission rate is based on this emissions unit's uncontrolled potential to emit, excluding off-line wire & felt cleaning and drying hoods. The hourly VOC emission rate was calculated by the following equation using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007 and emission test data from testing October 20-23, 2009:

E = the maximum machine dried tons paper (MDTP) capacity of 16.3 tons/hour x 0.2188 lb of VOC/MDTP per permittee-supplied 2009 emission test data from paper making operations;

where E = Emission Rate(pounds per hour).

If required, compliance with the VOC emission limitation, based upon the emission factor of 0.2188 lb of VOC per MDTP, shall be determined through subsequent emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Southwest Ohio Air Quality Agency.

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

b. Emission Limitation:

The drying hoods on this emissions unit shall not exceed the following emission limitations:

2.88 lbs of CO/hour when burning natural gas;

3.43 lbs of NOx/hour when burning natural gas;

0.19 lb of VOC/hour when burning natural gas;

1.22 lbs of CO/hur when burning LPG;

7.27 lbs of NOx/hour when burning LPG; and

0.11 lb of VOC/hour when burning LPG.

Applicable Compliance Method:

The hourly CO, VOC, and NOx emission rates listed above are based on this emissions unit's uncontrolled potential to emit from the drying hoods. The hourly emission rates were calculated by the following equations using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

For natural gas combustion:

E_{CO} = heat input capacity of 35 MMBtu/hour x 0.0823 lb of CO/MMBtu per AP-42 Table 1.4-1 for natural gas combustion;

E_{NOx} = heat input capacity of 35 MMBtu/hour x 0.098 lb of NOx/MMBtu per AP-42 Table 1.4-1 for natural gas combustion;

E_{VOC} = heat input capacity of 35 MMBtu/hour x 0.00539 lb of VOC/MMBtu per AP-42 Table 1.4-2 for natural gas combustion; and

For LPG (propane) combustion:

E_{CO} = heat input capacity of 35 MMBtu/hour x 0.0349 lb of CO/MMBtu per AP-42 Table 1.5-1 for LPG combustion;

E_{NOx} = heat input capacity of 35 MMBtu/hourx 0.2076 lb of NOx/MMBtu per AP-42 Table 1.5-1 for LPG combustion;

E_{VOC} = heat input capacity of 35 MMBtu/hour x 0.00328 lb of VOC/MMBtu per AP-42 Table 1.5-1 for LPG combustion;

where E = Emission $Rate_{(Pollutant)}$ (pounds per hour).

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

c. Emission Limitations:

The drying hoods on this emissions unit shall not exceed the following emission limitations:

0.02 lb of SO2/hour when burning natural gas;

0.07 lb of PE/hour when burning natural gas;

0.26 lb of PM10/hour when burning natural gas;

0.01 lb of SO2/hour when burning LPG;

0.23 lb of PE/hour when burning LPG; and

0.42 lb of PM10/hour when burning LPG.

Applicable Compliance Method:

The hourly SO2, PE, and PM10 emission rates listed above are based on this emissions unit's uncontrolled potential to emit from the drying hoods. The hourly emission rates were calculated by the following equations using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

For natural gas combustion:

E_{SO2} = heat input capacity of 35 MMBtu/hour x 0.00058 lb of SO2/MMBtu per AP-42 Table 1.4-2 for natural gas combustion;

E_{PE} = heat input capacity of 35 MMBtu/hour x 0.0019 lb of PE/MMBtu per AP-42 Table 1.4-2 for natural gas combustion;

E_{PM10} = heat input capacity of 35 MMBtu/hour x 0.0075 lb of PM10/MMBtu per AP-42 Table 1.4-2 for natural gas combustion; and

For LPG (propane) combustion:

E_{SO2} = heat input capacity of 35 MMBtu/hour x 0.00019 lb of SO2/MMBtu per AP-42 Table 1.5-1 for LPG combustion, using a sulfur content of 0.18 gr/100 ft3;

E_{PE} = heat input capacity of 35 MMBtu/hourx 0.00656 lb of PE/MMBtu per AP-42 Table 1.5-1 for LPG combustion;

E_{PM10} = heat input capacity of 35 MMBtu/hour x 0.0121 lb of PM10/MMBtu per AP-42 Table 1.5-1 for LPG combustion and condensables from FIRE ver. 6.25;

where E = Emission $Rate_{(Pollutant)}$ (pounds per hour).

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

d. Emission Limitation:

CO emissions from the drying hoods shall not exceed 12.62 TPY when burning any combination of natural gas or LPG.

Applicable Compliance Method:

The annual CO emission rate is based on this emissions unit's uncontrolled potential to emit from the drying hoods when burning natural gas as worst case fuel. The annual CO emission rate was calculated by the following equations using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

For natural gas combustion:

E = heat input capacity of 35 MMBtu/hour x 0.0823 lb of CO/MMBtu per AP-42 Table 1.4-1 for natural gas combustion x 8760 hours/(2000); and

For LPG (propane) combustion:

E = heat input capacity of 35 MMBtu/hourx 0.0349 lb of CO/MMBtu per AP-42 Table 1.5-1 for LPG combustion x 8760 hours/(2000);

where E = Emission Rate(tons per year).

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

e. Emission Limitation:

SO2 emissions from the drying hoods shall not exceed 0.09 TPY when burning any combination of natural gas or LPG.

Applicable Compliance Method:

The annual SO2 emission rate is based on this emissions unit's uncontrolled potential to emit from the drying hoods when burning natural gas as worst case fuel. The annual SO2 emission rate was calculated by the following equations using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

For natural gas combustion:

E = heat input capacity of 35 MMBtu/hour x 0.00058 lb of SO2/MMBtu per AP-42 Table 1.4-2 for natural gas combustion x 8760 hours/(2000); and

For LPG (propane) combustion:

E = heat input capacity of 35 MMBtu/hourx (0.00019 lb of SO2/MMBtu per AP-42 Table 1.5-1 for LPG combustion, using a sulfur content of 0.18 gr/100 ft3) x 8760 hours/(2000);

where E = Emission Rate(tons per year).

(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 associated with this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emission limitation shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1)(a), and OAC rule 3745-17-07(A))

g. Emission Limitations:

325 poundsper hour of VOC, from off-line wire and felt cleaning on emissions units P101 and P102, combined; and

39 TPY of VOC, from off-line wire and felt cleaning on emissions units P101 and P102, combined.

Applicable Compliance Method:

The hourly VOC emission rate is based on the combined emissions units' uncontrolled potential to emit for off-line wire and felt cleaning operations. The hourly VOC emission rate was calculated by the following equation using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

E = maximum solvent usage rate of 50 gallons per hour x 6.5 lbs of VOC per gallon of solvent;

where E = Emission Rate(pounds per hour).

Compliance with the annual VOC emission limitation shall be determined by compliance with the VOC input restriction specified in c)(2) and the record keeping requirements specified in d)(2).

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

h. Emission Limitation:

21.98 TPY of VOC from emissions units P101 and P102, combined, excluding drying hoods and off-line wire/felt cleaning.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by compliance with the MDTP operational restriction specified in c)(3) and record keeping requirements specified in d)(3).

If required, compliance with the VOC emission limitation, based upon the emission factor of 0.2188 lb of VOC per MDTP, shall be determined through subsequent emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Southwest Ohio Air Quality Agency.

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

i. Emission Limitations:

The drying hoods on emissions units P101 and P102, combined, when burning any combination of natural gas or LPG, shall not exceed the following emission limitations based upon a rolling, 12-month summation:

1.07 TPY of PE;

2.59 TPY of PM10;

39.9 TPY of NOx: and

1.47 TPY of VOC.

Applicable Compliance Method:

Compliance with the PE, PM10, VOC, and NOx emission limitations specified above shall be determined by the record keeping requirements specified in d)(4).

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

j. Emission Limitation:

The uncontrolled potential to emit from the drying hoods on this emissions unit is less than 10.0 TPY for SO2, PE and PM10.

Applicable Compliance Method:

The annual PE, PM10, and SO2 emission rates are based on this emissions unit's uncontrolled potential to emit from the drying hoods. The annual PE, PM10, and SO2 emission rates were calculated by the following equations using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

For natural gas combustion:

E_{PE} = heat input capacity of 35 MMBtu/hour x 0.0019 lb of PE/MMBtu per AP-42 Table 1.4-2 for natural gas combustion x 8760 hours/(2000);

E_{PM10} = heat input capacity of 35 MMBtu/hour x 0.0075 lb of PM10/MMBtu per AP-42 Table 1.4-2 for natural gas combustion x 8760 hours/(2000);

E_{SO2} = heat input capacity of 35 MMBtu/hour x 0.00058 lb of SO2/MMBtu per AP-42 Table 1.4-2 for natural gas combustion x 8760 hours/(2000); and

For LPG (propane) combustion:

E_{PE} = heat input capacity of 35 MMBtu/hour x 0.00656 lb of PE/MMBtu per AP-42 Table 1.5-1 for LPG combustion x 8760 hours/(2000);

E_{PM10} = heat input capacity of 35 MMBtu/hour x (0.0121 lb of PM10/MMBtu per AP-42 Table 1.5-1 for natural gas combustion and condensables from FIRE ver. 6.25) x 8760 hours/(2000);

E_{SO2} = heat input capacity of 35 MMBtu/hourx (0.00019 lb of SO2/MMBtu per AP-42 Table 1.5-1 for LPG combustion, using a sulfur content of 0.18 gr/100 ft3) x 8760 hours/(2000);

where E = Emission $Rate_{(Pollutant)}$ (tons per year).

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

k. Emission Limitation:

SO2 emissions shall not exceed 194.7 pounds per hour.

Applicable Compliance Method:

The hourly SO2 emissions rate is based on the equation in OAC rule 3745-18-06(E)(2) using a process weight rate of 16.3 MDTP per hour.

To determine the actual SO2 emission rate from this emissions unit, the following equations shall be used:

For natural gas combustion:

E = heat input capacity of 35 MMBtu/hour x 0.00058 lb of SO2/MMBtu per AP-42 Table 1.4-2 for natural gas combustion; and

For LPG (propane) combustion:

E = heat input capacity of 35 MMBtu/hourx (0.00019 lb of SO2/MMBtu per AP-42 Table 1.5-1 for LPG combustion, using a sulfur content of 0.18 gr/100 ft3);

where E = Emission Rate(pounds per hour).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-06(E)(2), 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 #P0115882, issued on 2/13/2014: f)(1). 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) Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply

for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

(Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(F)(3)(c) and F(4))

8. P102, Paper Machine No. 2 (BWP)

Operations, Property and/or Equipment Description:

Paper Machine 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) g)(1).

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 P0115882, issued 2/13/2014)	Volatile organic compound (VOC) emissions shall not exceed 3.09pounds per hour*, excluding off-line wire & felt cleaning and drying hoods. The drying hoods on this emissions unit shall not exceed the following emission limitations: When burning natural gas, 2.67 pounds of nitrogen oxides (NOx) per hour*, and 0.15 pound of VOC per hour*. When burning LPG (propane), 5.65 pounds of nitrogen oxides (NOx) per hour*, and 0.09 pound of VOC per hour*. *The hourly emission limitations outlined above are based on the emission unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with these limitations. See b)(2)a.i. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D) *Voluntary Restriction to Avoid Non-Attainment New Source Review and Prevention of Significant Deterioration*	See b)(2)a.ii., b)(2)b., b)(2)c., c)(2), and c)(3).
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack associated with this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO2) emissions shall not exceed 100.76 pounds per hour. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3), as effective 11/30/2001.
e.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	The drying hoods on this emissions unit shall not exceed the following emission limitations: When burning natural gas, 0.02 pound of sulfur dioxide (SO2) per hour*, 0.05 pound of particulate emissions (PE) per hour*, 0.20 pound of particulate matter 10 microns and less in diameter (PM10) per hour*, and 2.24 pounds of carbon monoxide (CO) per hour*. When burning LPG (propane), 0.01 pound of SO2 per hour*, 0.18 pound of PE per hour*, 0.33 pound of PM10 per hour*, and 0.95 pound of CO per hour*. When burning any combination of natural gas or LPG, 0.07 ton per year (TPY) of SO2 emissions*, and 9.81 tons per year (TPY) of CO emissions*. *The hourly and annual emission limitations outlined above are based on the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with these limitations.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)e. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and OAC rule 3745-31-05(D).
f.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/2006	See b)(2)f.

(2) Additional Terms and Conditions

a. The maximum total emissions from emissions units P101 and P102, combined, shall not exceed the following emission limitations from off-line wire and felt cleaning operations:

i. 325 pounds VOC per hour*; and

ii. 39 TPY VOC, based upon a rolling, 12-month summation.

*The hourly emission limitation outlined above is based on the potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limitation.

b. The maximum total emissions from emissions units P101 and P102, combined, excluding drying hoods and off-line wire/felt cleaning, shall not exceed the following emission limitation based upon a rolling, 12-month summation:

21.98 TPY of VOC.

c. The maximum total annual emissions from the drying hoods on emissions units P101 and P102, combined, when burning any combination of natural gas or LPG, shall not exceed the following emission limitations based upon a rolling, 12-month summation:

1.07 TPY of PE;

2.59 TPY of particulate matter 10 microns and less in diameter (PM10);

39.9 TPY of NOx; and

1.47 TPY of VOC.

d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations and the use of natural gas and/or propane.

e. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

f. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO2, PE, PM10, and CO emissions from the drying hoods of this air contaminant source since the uncontrolled potential to emit for SO2, PE, PM10, and CO is each less than 10 tons per year (TPY).

c) Operational Restrictions

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

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

(2) The maximum annual VOC input, as applied, of liquid organic materials employed by the off-line wire and felt cleaning operations in emissions units P101 and P102, combined, shall not exceed 39 tons per year as a rolling, 12-month summation. The VOC input shall be determined by multiplying the gallons of liquid organic materials employed per month by the VOC content of each liquid organic material (see record keeping requirements in d)(2)).

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

(3) The maximum annual processing rate for emissions units P101 and P102, combined, shall not exceed 145,845 TPY, based upon a rolling, 12-month summation of machine dried tons of paper (MDTP).

(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) For each day during which the permittee burns a fuel other than natural gas or LPG, 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))

(2) The permittee shall collect and record the following information each month for emissions units P101 and P102, combined, from the off-line wire and felt cleaning operations:

a. the name and identification of each solvent employed;

b. the VOC content of each solvent employed, in pounds per gallon;

c. the number of gallons of each solvent employed;

d. the monthly VOC input (the summation of the results of the value from line b. multiplied by the value from line c. for each liquid organic material employed);

e. the updated rolling, 12-month summation total, in tons, of VOC input (the total amount of VOC input for the current month recorded in line d. plus the total amount of VOC input for the previous eleven calendar months); and

f. the updated rolling, 12-month summation total, in tons, of VOC emissions (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months), assuming 100 percent of VOC input value from line e. is emitted to the air.

(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 collect and record the following information each month for emissions units P101 and P102, combined, excluding off-line wire and felt cleaning and the drying hoods:

a. the total amount of machine dried tons of paper (MDTP), in tons per month;

b. the updated rolling, 12-month summation of MDTP, in tons (the total amount of tons for the current month plus the total amount of tons for the previous eleven calendar months);

c. the total emissions, in tons, of VOC calculated by the following equation:

E = [(MDTP/month for emissions unit P101 x 0.2188 lb of VOC/MDTP*) + (MDTP/month for emissions unit P102 x 0.5069 lb of VOC/MDTP*)]/2000,

where E = Emission Rate(tons per month).

*the emission factors established during the most recent emission test for these emissions units (October 20-23, 2009).

d. the updated rolling, 12-month summation emissions total, in tons, of VOC (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar 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))

(4) The permittee shall collect and record the following information each month for emissions units P101 and P102:

a. the combined amount of LPG used in the drying hoods associated with emissions units P101 and P102, in gallons per month;

b. the combined amount of natural gas used in the drying hoods associated with emissions units P101 and P102, in cubic feet per month;

c. the monthly combined PE, PM10, NOx, and VOC emissions from the drying hoods associated with emissions units P101 and P102; and

d. the updated rolling, 12-month summation of PE, PM10, NOx, and VOC emissions from the drying hoods associated with emissions units P101 and P102 combined (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar 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))

(5) 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 #P0115882, issued on 2/13/2014:d)(1) – d)(4). 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) 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 LPG (propane). The notification shall include a copy of such record and shall be submitted to the Southwest Ohio Air Quality Agency within 30 days after the deviation occurs.

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

(2) The permittee shall submit annual reports that specify the total VOC and NOx emissions from this emissions unit for the calendar year. These reports shall be submitted by April

15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

(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 submit quarterly deviation (excursion) reports that identify the following:

a. an identification of all exceedances of the rolling, 12-month VOC input operational restriction for the off-line wire and felt cleaning operations on emissions units P101 and P102, combined, as specified in c)(2);

b. an identification of all exceedances of the rolling, 12-month emission limitation for VOC from the off-line wire and felt cleaning operations on emissions units P101 and P102, combined, as specified in b)(2)a.ii.;

c. an identification of all exceedances of the rolling, 12-month MDTP operational restriction for emissions units P101 and P102, combined, as specified in c)(3);

d. an identification of all exceedances of the rolling, 12-month emission limitation for VOC for emissions units P101 and P102, combined, (excluding drying hoods and off-line wire/felt cleaning operations), as specified in b)(2)b.*;* and

e. an identification of all exceedances of the rolling, 12-month emission limitations for PE, PM10, VOC, and NOx from the drying hoods on emissions units P101 and P102, combined, when burning any combination of natural gas or LPG, as specified in b)(2)c*.*

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))

(4) 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))

(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 #P0115882, issued on 2/13/2014: 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 Limitation:

VOC emissions shall not exceed 3.09 pounds per hour, excluding off-line wire & felt cleaning and drying hoods.

Applicable Compliance Method:

The hourly VOC emission rate is based on this emissions unit's uncontrolled potential to emit, excluding off-line wire & felt cleaning and drying hoods. The hourly VOC emission rate was calculated by the following equation using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007 and emission test data from testing October 20-23, 2009:

E = the maximum machine dried tons paper (MDTP) capacity of 6.1 tons/hour x 0.5069 lb of VOC/MDTP per permittee-supplied 2009 emission test data from paper making operations;

where E = Emission Rate(pounds per hour).

If required, compliance with the VOC emission limitation, based upon the emission factor of 0.5069 lb of VOC per MDTP, shall be determined through subsequent emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Southwest Ohio Air Quality Agency.

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

b. Emission Limitations:

The drying hoods on this emissions unit shall not exceed the following emission limitations:

2.67 lbs of NOx/hour when burning natural gas;

0.15 lb of VOC/hour when burning natural gas;

5.65 lbs of NOx/hour when burning LPG; and

0.09 lb of VOC/hour when burning LPG.

Applicable Compliance Method:

The hourly VOC and NOx emission rates listed above are based on this emissions unit's uncontrolled potential to emit from the drying hoods. The hourly

emission rates were calculated by the following equations using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

For natural gas combustion:

E_{NOx} = heat input capacity of 27.2 MMBtu/hour x 0.098 lb of NOx/MMBtu per AP-42 Table 1.4-1 for natural gas combustion;

E_{VOC} = heat input capacity of 27.2 MMBtu/hour x 0.00539 lb of VOC/MMBtu per AP-42 Table 1.4-2 for natural gas combustion; and

For LPG (propane) combustion:

E_{NOx} = heat input capacity of 27.2 MMBtu/hourx 0.2076 lb of NOx/MMBtu per AP-42 Table 1.5-1 for LPG combustion;

E_{VOC} = heat input capacity of 27.2 MMBtu/hour x 0.00328 lb of VOC/MMBtu per AP-42 Table 1.5-1 for LPG combustion;

where E = Emission $Rate_{(Pollutant)}$ (pounds per hour).

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

c. Emission Limitations:

The drying hoods on this emissions unit shall not exceed the following emission limitations:

0.02 lb of SO2/hour when burning natural gas;

0.05 lb of PE/hour when burning natural gas;

0.20 lb of PM10/hour when burning natural gas;

2.24 lbs of CO/hour when burning natural gas;

0.01 lb of SO2/hour when burning LPG;

0.18 lb of PE/hour when burning LPG;

0.33 lb of PM10/hour when burning LPG; and

0.95 lb of CO/hour when burning LPG.

Applicable Compliance Method:

The hourly SO2, PE, PM10, and CO emission rates listed above are based on this emissions unit's uncontrolled potential to emit from the drying hoods. The hourly emission rates were calculated by the following equations using the

information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

For natural gas combustion:

E_{SO2} = heat input capacity of 27.2 MMBtu/hour x 0.00058 lb of SO2/MMBtu per AP-42 Table 1.4-2 for natural gas combustion;

E_{PE} = heat input capacity of 27.2 MMBtu/hour x 0.0019 lb of PE/MMBtu per AP-42 Table 1.4-2 for natural gas combustion;

E_{PM10} = heat input capacity of 27.2 MMBtu/hour x 0.0075 lb of PM10/MMBtu per AP-42 Table 1.4-2 for natural gas combustion;

E_{CO} = heat input capacity of 27.2 MMBtu/hour x 0.0823 lb of CO/MMBtu per AP-42 Table 1.4-1 for natural gas combustion; and

For LPG (propane) combustion:

E_{SO2} = heat input capacity of 27.2 MMBtu/hour x 0.00019 lb of SO2/MMBtu per AP-42 Table 1.5-1 for LPG combustion, using a sulfur content of 0.18 gr/100 ft3;

E_{PE} = heat input capacity of 27.2 MMBtu/hourx 0.00656 lb of PE/MMBtu per AP-42 Table 1.5-1 for LPG combustion;

E_{PM10} = heat input capacity of 27.2 MMBtu/hour x 0.0121 lb of PM10/MMBtu per AP-42 Table 1.5-1 for LPG combustion and condensables from FIRE ver. 6.25;

E_{CO} = heat input capacity of 27.2 MMBtu/hour x 0.0349 lb of CO/MMBtu per AP-42 Table 1.5-1 for LPG combustion;

where E = Emission $Rate_{(Pollutant)}$ (pounds per hour).

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

d. Emission Limitations:

SO2 emissions from the drying hoods shall not exceed 0.07 TPY when burning any combination of natural gas or LPG.

CO emissions from the drying hoods shall not exceed 9.81 TPY when burning any combination of natural gas or LPG.

Applicable Compliance Method:

The annual SO2 and CO emission rates are based on this emissions unit's uncontrolled potential to emit from the drying hoods when burning natural gas as worst case fuel. The annual SO2 and CO emission rates were calculated by the following equations using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

For natural gas combustion:

E_{SO2} = heat input capacity of 27.2 MMBtu/hour x 0.00058 lb of SO2/MMBtu per AP-42 Table 1.4-2 for natural gas combustion x 8760 hours/(2000);

E_{CO} = heat input capacity of 27.2 MMBtu/hour x 0.0823 lb of CO/MMBtu per AP-42 Table 1.4-1 for natural gas combustion x 8760 hours/(2000); and

For LPG (propane) combustion:

E_{SO2} = heat input capacity of 27.2 MMBtu/hourx (0.00019 lb of SO2/MMBtu per AP-42 Table 1.5-1 for LPG combustion, using a sulfur content of 0.18 gr/100 ft3) x 8760 hours/(2000);

E_{CO} = heat input capacity of 27.2 MMBtu/hourx 0.0349 lb of CO/MMBtu per AP-42 Table 1.5-1 for LPG combustion x 8760 hours/(2000);

where E = Emission Rate(tons per year).

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

e. Emission Limitation:

Visible particulate emissions from any stack associated with this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance with the stack visible particulate emission limitation shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), OAC rule 3745-17-03(B)(1)(a), and OAC rule 3745-17-07(A))

f. Emission Limitations:

325 poundsper hour of VOC, from off-line wire and felt cleaning on emissions units P101 and P102, combined; and

39 TPY of VOC, from off-line wire and felt cleaning on emissions units P101 and P102, combined.

Applicable Compliance Method:

The hourly VOC emission rate is based on the combined emissions units' uncontrolled potential to emit for off-line wire and felt cleaning operations. The hourly VOC emission rate was calculated by the following equation using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

E = maximum solvent usage rate of 50 gallons per hour x 6.5 lbs of VOC per gallon of solvent;

where E = Emission Rate(pounds per hour).

Compliance with the annual VOC emission limitation shall be determined by compliance with the VOC input restriction specified in c)(2) and the record keeping requirements specified in d)(2).

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

g. Emission Limitation:

21.98 TPY of VOC from emissions units P101 and P102, combined, excluding drying hoods and off-line wire/felt cleaning.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by compliance with the MDTP operational restriction specified in c)(3) and record keeping requirements specified in d)(3).

If required, compliance with the VOC emission limitation, based upon the emission factor of 0.5069 lb of VOC per MDTP, shall be determined through subsequent emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Southwest Ohio Air Quality Agency.

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

h. Emission Limitations:

The drying hoods on emissions units P101 and P102, combined, when burning any combination of natural gas or LPG, shall not exceed the following emission limitations based upon a rolling, 12-month summation:

1.07 TPY of PE;

2.59 TPY of PM10;

39.9 TPY of NOx: and

1.47 TPY of VOC.

Applicable Compliance Method:

Compliance with the PE, PM10, VOC, and NOx emission limitations specified above shall be determined by the record keeping requirements specified in d)(4).

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

i. Emission Limitation:

The uncontrolled potential to emit from the drying hoods on this emissions unit is less than 10.0 TPY for SO2, PE, PM10, and CO.

Applicable Compliance Method:

The annual SO2, PE, PM10, and CO emission rates are based on this emissions unit's uncontrolled potential to emit from the drying hoods. The annual SO2, PE, PM10, and CO emission rates were calculated by the following equations using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

For natural gas combustion:

E_{SO2} = heat input capacity of 27.2 MMBtu/hour x 0.00058 lb of SO2/MMBtu per AP-42 Table 1.4-2 for natural gas combustion x 8760 hours/(2000);

E_{PE} = heat input capacity of 27.2 MMBtu/hour x 0.0019 lb of PE/MMBtu per AP-42 Table 1.4-2 for natural gas combustion x 8760 hours/(2000);

E_{PM10} = heat input capacity of 27.2 MMBtu/hour x 0.0075 lb of PM10/MMBtu per AP-42 Table 1.4-2 for natural gas combustion x 8760 hours/(2000);

E_{CO} = heat input capacity of 27.2 MMBtu/hour x 0.0823 lb of CO/MMBtu per AP-42 Table 1.4-1 for natural gas combustion x 8760 hours/(2000); and

For LPG (propane) combustion:

E_{SO2} = heat input capacity of 27.2 MMBtu/hourx (0.00019 lb of SO2/MMBtu per AP-42 Table 1.5-1 for LPG combustion, using a sulfur content of 0.18 gr/100 ft3) x 8760 hours/(2000);

E_{PE} = heat input capacity of 27.2 MMBtu/hour x 0.00656 lb of PE/MMBtu per AP-42 Table 1.5-1 for LPG combustion x 8760 hours/(2000);

E_{PM10} = heat input capacity of 27.2 MMBtu/hour x (0.0121 lb of PM10/MMBtu per AP-42 Table 1.5-1 for natural gas combustion and condensables from FIRE ver. 6.25) x 8760 hours/(2000);

E_{CO} = heat input capacity of 27.2 MMBtu/hourx 0.0349 lb of CO/MMBtu per AP-42 Table 1.5-1 for LPG combustion x 8760 hours/(2000);

where E = Emission $Rate_{(Pollutant)}$ (tons per year).

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

j. Emission Limitation:

SO2 emissions shall not exceed 100.76 pounds per hour.

Applicable Compliance Method:

The hourly allowable SO2 emission rate is based on the equation in OAC rule 3745-18-06(E)(2) using a process weight rate of 6.1 MDTP per hour.

To determine the actual SO2 emission rate from this emissions unit, the following equations shall be used:

For natural gas combustion:

E = heat input capacity of 27.2 MMBtu/hour x 0.00058 lb of SO2/MMBtu per AP-42 Table 1.4-2 for natural gas combustion; and

For LPG (propane) combustion:

E = heat input capacity of 27.2 MMBtu/hourx (0.00019 lb of SO2/MMBtu per AP-42 Table 1.5-1 for LPG combustion, using a sulfur content of 0.18 gr/100 ft3);

where E = Emission Rate(pounds per hour).

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-18-06(E)(2), 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 #P0115882, issued on 2/13/2014: f)(1). 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) Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

(Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(F)(3)(c) and F(4))

9. P103, Natural Deinking Plant (BWP)

Operations, Property and/or Equipment Description:

Natural De-Inking (NDI)

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) g)(1).

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), as effective 11/30/2001 (PTI P0115882, issued 2/13/2014)	Volatile organic compound (VOC) emissions shall not exceed 0.50 pound per hour*. *The hourly emission limitation outlined above is based on the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with this limitation. See b)(2)a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/2006	See b)(2)b.
c.	OAC rule 3745-31-05(D) *Voluntary Restriction to Avoid Non-Attainment New Source Review*	See b)(2)c. and c)(1).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that

BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons per year (TPY).

c. The maximum total annual emissions from emissions units P103, P104, and P107, combined, shall not exceed the following emission limitation based upon a rolling, 12-month summation:

6.76 TPY of VOC.

d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations and operational restriction.

c) Operational Restrictions

(1) The maximum annual processing rate for emissions units P103, P104, and P107, combined, shall not exceed 300,000 tons per year of waste paper (does not include virgin pulp), based upon a rolling, 12-month summation of machine dried tons input (MDTI).

(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 collect and record the following information each month for emissions units P103, P104, and P107, combined:

a. the total amount of machine dried tons of input (MDTI), in tons per month;

b. the updated rolling, 12-month summation of MDTI, in tons (the total amount of tons for the current month plus the total amount of tons for the previous eleven calendar months);

c. the total emissions, in tons, of VOC calculated by taking the monthly MDTI value from term d)(1)a. above and multiplying by the emission factor of 0.0392 lb of VOC/MDTI, established during the most recent emissions test for these emissions units, then dividing by 2000; and

d. the updated rolling, 12-month summation emissions total, in tons, of VOC (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar 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 #P0115882, issued on 2/13/2014: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) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. an identification of all exceedances of the rolling, 12-month MDTI operational restriction for emissions units P103, P104, and P107, combined, as specified in c)(1); and

b. an identification of all exceedances of the rolling, 12-month emission limitation for VOC for emissions units P103, P104, and P107, combined, as specified in in b)(2)c.

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))

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

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

(3) 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 #P0115882, issued on 2/13/2014: e)(1) and e)(2). 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 Limitation:

Volatile organic compound (VOC) emissions shall not exceed 0.50 pound per hour.

Applicable Compliance Method:

The hourly VOC emission rate is based on this emissions unit's uncontrolled potential to emit. The hourly VOC emission rate was calculated by the following equation using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007 and emission test data from testing October 20-23, 2009:

E = machine dried recycled input rate of 12.3 tons/hour x 0.035 lb of VOC/MDTI per permittee-supplied 2009 emission test data from de-inking operations x 1.15 (15% above tested VOC/MDTI rate to allow for testing variables);

where E = Emission Rate(pound per hour).

If required, compliance with the VOC emission limitation, based upon the emission factor of 0.035 lb of VOC per MDTI for emissions unit P103 individually, shall be determined through subsequent emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Southwest Ohio Air Quality Agency.

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

b. Emission Limitation:

6.76 TPY of VOC, for emissions units P103, P104, and P107, combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the VOC emission limitation specified above shall be determined by the record keeping requirements specified in d)(1). It should be noted that in order to obtain the 6.76 TPY above emission limitation value that the company requested that a 15% or 1.15 multiplier be assigned to the emission factor listed in d)(1).

If required, compliance with the VOC emission limitation, based upon the emission factor of 0.0392 lb of VOC per MDTI for emissions units P103, P104, and P107, combined, shall be determined through subsequent emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through

4, and Method 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Southwest Ohio Air Quality Agency.

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

c. Emission Limitation:

The uncontrolled potential to emit for this emissions unit is less than 10.0 TPY of VOC.

Applicable Compliance Method:

The annual VOC emission rate is based on this emissions unit's uncontrolled potential to emit. The annual VOC emission rate was calculated by the following equation using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007 and emission test data from testing October 20-23, 2009:

E = machine dried recycled input rate of 12.3 tons/hour x 0.035 lb of VOC/MDTI per permittee-supplied 2009 emission test data from de-inking operations x 1.15 (15% above tested VOC/MDTI rate to allow for testing variables) x 8760 hours/(2000);

where E = Emission Rate(tons per year).

(Authority for term: OAC rule 3745-77-07(C)(1) 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 #P0115882, issued on 2/13/2014: f)(1). 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) Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

(Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(F)(3)(c) and F(4))

10. P104, Bleach Deinking Plant (BWP)

Operations, Property and/or Equipment Description:

Bleach De-Inking (BDI)

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) g)(1).

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), as effective 11/30/2001 (PTI P0115882, issued 2/13/2014)	Volatile organic compound (VOC) emissions shall not exceed 0.99 pound per hour*. *The hourly emission limitation outlined above is based on the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with this limitation. See b)(2)a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/2006	See b)(2)b.
c.	OAC rule 3745-31-05(D) *Voluntary Restriction to Avoid Non-Attainment New Source Review*	See b)(2)c. and c)(1).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that

BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons per year (TPY).

c. The maximum total annual emissions from emissions units P103, P104, and P107, combined, shall not exceed the following emission limitation based upon a rolling, 12-month summation:

6.76 TPY of VOC.

d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations and operational restriction.

c) Operational Restrictions

(1) The maximum annual processing rate for emissions units P103, P104, and P107, combined, shall not exceed 300,000 tons per year of waste paper (does not include virgin pulp), based upon a rolling, 12-month summation of machine dried tons input (MDTI).

(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 collect and record the following information each month for emissions units P103, P104, and P107, combined:

a. the total amount of machine dried tons of input (MDTI), in tons per month;

b. the updated rolling, 12-month summation of MDTI, in tons (the total amount of tons for the current month plus the total amount of tons for the previous eleven calendar months);

c. the total emissions, in tons, of VOC calculated by taking the monthly MDTI value from term d)(1)a. above and multiplying by the emission factor of 0.0392 lb of VOC/MDTI, established during the most recent emissions test for these emissions units, then dividing by 2000; and

d. the updated rolling, 12-month summation emissions total, in tons, of VOC (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar 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 #P0115882, issued on 2/13/2014: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) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. an identification of all exceedances of the rolling, 12-month MDTI operational restriction for emissions units P103, P104, and P107, combined, as specified in c)(1); and

b. an identification of all exceedances of the rolling, 12-month emission limitation for VOC for emissions units P103, P104, and P107, combined, as specified in in b)(2)c.

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))

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

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

(3) 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 #P0115882, issued on 2/13/2014: e)(1) and e)(2). 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 Limitation:

Volatile organic compound (VOC) emissions shall not exceed 0.99 pound per hour.

Applicable Compliance Method:

The hourly VOC emission rate is based on this emissions unit's uncontrolled potential to emit. The hourly VOC emission rate was calculated by the following equation using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007 and emission test data from testing October 20-23, 2009:

E = machine dried recycled input rate of 24.7 tons/hour x 0.035 lb of VOC/MDTI per permittee-supplied 2009 emission test data from de-inking operations x 1.15 (15% above tested VOC/MDTI rate to allow for testing variables);

where E = Emission Rate(pound per hour).

If required, compliance with the VOC emission limitation, based upon the emission factor of 0.035 lb of VOC per MDTI for emissions unit P104 individually, shall be determined through subsequent emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Southwest Ohio Air Quality Agency.

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

b. Emission Limitation:

6.76 TPY of VOC, for emissions units P103, P104, and P107, combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the VOC emission limitation specified above shall be determined by the record keeping requirements specified in d)(1). It should be noted that in order to obtain the 6.76 TPY above emission limitation value that the company requested that a 15% or 1.15 multiplier be assigned to the emission factor listed in d)(1).

If required, compliance with the VOC emission limitation, based upon the emission factor of 0.0392 lb of VOC per MDTI for emissions units P103, P104, and P107, combined, shall be determined through subsequent emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through

4, and Method 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Southwest Ohio Air Quality Agency.

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

c. Emission Limitation:

The uncontrolled potential to emit for this emissions unit is less than 10.0 TPY of VOC.

Applicable Compliance Method:

The annual VOC emission rate is based on this emissions unit's uncontrolled potential to emit. The annual VOC emission rate was calculated by the following equation using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007 and emission test data from testing October 20-23, 2009:

E = machine dried recycled input rate of 24.7 tons/hour x 0.035 lb of VOC/MDTI per permittee-supplied 2009 emission test data from de-inking operations x 1.15 (15% above tested VOC/MDTI rate to allow for testing variables) x 8760 hours/(2000);

where E = Emission Rate(tons per year).

(Authority for term: OAC rule 3745-77-07(C)(1) 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 #P0115882, issued on 2/13/2014: f)(1). 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) Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

(Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(F)(3)(c) and F(4))

11. P107, Broke System (BWP)

Operations, Property and/or Equipment Description:

Broke System

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) g)(1).

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), as effective 11/30/2001 (PTI P0115882, issued 2/13/2014)	Volatile organic compound (VOC) emissions shall not exceed 0.03 pound per hour*. *The hourly emission limitation outlined above is based on the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with this limitation. See b)(2)a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(A)(3)(b), as effective 12/1/2006	See b)(2)b.
c.	OAC rule 3745-31-05(D) *Voluntary Restriction to Avoid Non-Attainment New Source Review*	See b)(2)c. and c)(1).

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that

BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons per year (TPY).

c. The maximum total annual emissions from emissions units P103, P104, and P107, combined, shall not exceed the following emission limitation based upon a rolling, 12-month summation:

6.76 TPY of VOC.

d. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations and operational restriction.

c) Operational Restrictions

(1) The maximum annual processing rate for emissions units P103, P104, and P107, combined, shall not exceed 300,000 tons per year of waste paper (does not include virgin pulp), based upon a rolling, 12-month summation of machine dried tons input (MDTI).

(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 collect and record the following information each month for emissions units P103, P104, and P107, combined:

a. the total amount of machine dried tons of input (MDTI), in tons per month;

b. the updated rolling, 12-month summation of MDTI, in tons (the total amount of tons for the current month plus the total amount of tons for the previous eleven calendar months);

c. the total emissions, in tons, of VOC calculated by taking the monthly MDTI value from term d)(1)a. above and multiplying by the emission factor of 0.0392 lb of VOC/MDTI, established during the most recent emission test for these emissions units, then dividing by 2000; and

d. the updated rolling, 12-month summation emissions total, in tons, of VOC (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar 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 #P0115882, issued on 2/13/2014: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) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. an identification of all exceedances of the rolling, 12-month MDTI operational restriction for emissions units P103, P104, and P107, combined, as specified in c)(1); and

b. an identification of all exceedances of the rolling, 12-month emissions limitation for VOC for emissions units P103, P104, and P107, combined, as specified in in b)(2)c.

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))

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

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

(3) 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 #P0115882, issued on 2/13/2014: e)(1) and e)(2). 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 Limitation:

Volatile organic compound (VOC) emissions shall not exceed 0.03 pound per hour.

Applicable Compliance Method:

The hourly VOC emission rate is based on this emissions unit's uncontrolled potential to emit. The hourly VOC emission rate was calculated by the following equation using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007 and emission test data from testing October 20-23, 2009:

E = machine dried recycled input rate of 6.8 tons/hour x 0.0042 lb of VOC/MDTI per permittee-supplied 2009 emission test data from de-inking operations x 1.15 (15% above tested VOC/MDTI rate to allow for testing variables);

where E = Emission Rate(pound per hour).

If required, compliance with the VOC emission limitation, based upon the emission factor of 0.0042 lb of VOC per MDTI for emissions unit P107 individually, shall be determined through subsequent emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Southwest Ohio Air Quality Agency.

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

b. Emission Limitation:

6.76 TPY of VOC, for emissions units P103, P104, and P107, combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the VOC emission limitation specified above shall be determined by the record keeping requirements specified in d)(1). It should be noted that in order to obtain the 6.76 TPY above emission limitation value that the company requested that a 15% or 1.15 multiplier be assigned to the emission factor listed in d)(1).

If required, compliance with the VOC emission limitation, based upon the emission factor of 0.0392 lb of VOC per MDTI for emissions units P103, P104, and P107, combined, shall be determined through subsequent emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through

4, and Method 25 or 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Southwest Ohio Air Quality Agency.

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

c. Emission Limitation:

The uncontrolled potential to emit for this emissions unit is less than 10.0 TPY of VOC.

Applicable Compliance Method:

The annual VOC emission rate is based on this emissions unit's uncontrolled potential to emit. The annual VOC emission rate was calculated by the following equation using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007 and emission test data from testing October 20-23, 2009:

E = machine dried recycled input rate of 6.8 tons/hour x 0.0042 lb of VOC/MDTI per permittee-supplied 2009 emission test data from de-inking operations x 1.15 (15% above tested VOC/MDTI rate to allow for testing variables) x 8760 hours/(2000);

where E = Emission Rate(tons per year).

(Authority for term: OAC rule 3745-77-07(C)(1) 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 #P0115882, issued on 2/13/2014: f)(1). 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) Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

(Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(F)(3)(c) and F(4))