

Facility ID: 0819070018 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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Facility ID: 0819070018 Emissions Unit ID: P047 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P047 - Paper Curing Oven - 600 lbs/hr; Ov. 3001 with Regenerative Thermal Oxidizer	OAC rule 3745-31-05 (A)(3) PTI 08-04315	Organic Compounds (OC): 0.78 lb/hr, 0.18 ton/month, 2.13 TPY  The requirements of this rule also include compliance with the requirements of OAC 3745-21-07 (G)(6)(a).  Reference A.2.b.
	OAC rule 3745-35-07 (B) Synthetic Minor Title V	Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.
	OAC rule 3745-21-07 (G)(6)(a)	
	OAC rule 3745-21-07 (G)(1)	The requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).

**2. Additional Terms and Conditions**

- (a) The hourly emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

**B. Operational Restrictions**

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1650 degrees Fahrenheit.
2. The maximum paper usage rate for this emissions unit shall not exceed 273,750 lbs/month or 3,285,000 lbs/year, based on rolling, 12-month summations.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1650 degrees Fahrenheit.
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall collect and record the paper usage rate, in pounds, each month for this emissions unit.
  3. The permittee shall collect and record the following information each month for the entire facility.
    - a. The total individual Hazardous Air Pollutant (HAP)\* emission rate, in tons per month, for each HAP employed at this facility.
    - b. The total combined HAP emission rate, in tons per month, for all of the HAPs employed at this facility.
    - c. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.
    - d. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

\*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:
  - a. the paper usage limitations;
  - b. the individual facility HAP limitation; and
  - c. the combined facility HAP limitation.
3. The permittee shall submit all reports required by this permit in accordance with the general terms and condition A.2.
4. The permittee shall submit annual reports which specify the individual HAP emission rate and the combined HAP emission rate from this facility. These reports shall be submitted to the Director (appropriate Ohio EPA District Office or local air agency) by January 31 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation-  
0.78 lb/hr OC  
  
Applicable Compliance Method-  
Compliance with this emissions limitation shall be based upon the following:
  - i. Multiply the maximum paper usage of 600 lbs/hr by the emission factor of  $1.35 \times 10^{-4}$  lb formaldehyde/lb paper, as derived from the December, 1999 stack test.
  - ii. Multiply the maximum paper usage of 600 lbs/hr by the emission factor of  $2.865 \times 10^{-4}$  lb phenol/lb paper, as derived from the December, 1999 stack test.
  - iii. Multiply the maximum paper usage of 600 lbs/hr by the emission factor of  $6.975 \times 10^{-4}$  lb methanol/lb paper, as derived from the December, 1999 stack test.
  - iv. Multiply the maximum paper usage of 600 lbs/hr by the emission factor of  $1.75 \times 10^{-4}$  lb isopropanol/lb paper, as derived from the December, 1999 stack test.
  - v. Sum the products from i. through iv., for the total hourly OC emission rate in pounds.

Emission Limitation-  
0.18 ton/month OC

Applicable Compliance Method-  
Compliance with this emissions limitation shall be based upon the following:

- i. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of  $1.35 \times 10^{-4}$  lb formaldehyde/lb paper, as derived from the December, 1999 stack test.
- ii. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of  $2.865 \times 10^{-4}$  lb phenol/lb paper, as derived from the December, 1999 stack test.
- iii. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of  $6.975 \times 10^{-4}$  lb methanol/lb paper, as derived from the December, 1999 stack test.

- iv. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 1.75 x 10<sup>-4</sup> lb isopropanol/lb paper, as derived from the December, 1999 stack test.
- v. Sum the products from i. through iv., in lbs OC/month, for each month and divide by 2000 lbs/ton.

Emission Limitation-  
2.13 TPY OC

Applicable Compliance Method-

Compliance with this emissions limitation shall be based upon record keeping in Section C.2. and shall be the sum of the 12-monthly limits, in lbs, divided by 2000 lbs/ton.

Compliance with the facility wide HAP emission limitations in Section A.2.b. shall be demonstrated by the record keeping required in Section C.3.

F. **Miscellaneous Requirements**

- 1. In accordance with OAC rule 3745-35-07, the following terms in this permit are federally enforceable: A.2.b., C.3., D.2.b., D.2.c.

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Facility ID: 0819070018 Emissions Unit ID: P048 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P048 - Paper Curing Oven - 550 lbs/hr; Ov 3002 with Regenerative Thermal Oxidizer	OAC rule 3745-31-05 (A)(3) PTI 08-04315	Organic Compounds (OC): 0.71 lb/hr, 0.16 ton/month, 1.93 TPY  The requirements of this rule also include compliance with the requirements of OAC 3745-21-07 (G)(6)(a).  Reference A.2.b.
	OAC rule 3745-35-07 (B) Synthetic Minor Title V	Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.
	OAC rule 3745-21-07 (G)(6)(a)	
	OAC rule 3745-21-07 (G)(1)	The requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).

2. **Additional Terms and Conditions**

- (a) The hourly emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.  
The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

B. **Operational Restrictions**

- 1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1650 degrees Fahrenheit.

2. The maximum paper usage rate for this emissions unit shall not exceed 249,417 lbs/month or 2,993,000 lbs/year, based on rolling, 12-month summations.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1650 degrees Fahrenheit.
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall collect and record the paper usage rate, in pounds, each month for this emissions unit.
  3. The permittee shall collect and record the following information each month for the entire facility.
    - a. The total individual Hazardous Air Pollutant (HAP)\* emission rate, in tons per month, for each HAP employed at this facility.
    - b. The total combined HAP emission rate, in tons per month, for all of the HAPs employed at this facility.
    - c. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.
    - d. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:
  - a. the paper usage limitations;
  - b. the individual facility HAP limitation; and
  - c. the combined facility HAP limitation.
3. The permittee shall submit all reports required by this permit in accordance with the general terms and condition A.2.
4. The permittee shall submit annual reports which specify the individual HAP emission rate and the combined HAP emission rate from this facility. These reports shall be submitted to the Director (appropriate Ohio EPA District Office or local air agency) by January 31 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation-  
0.71 lb/hr OC  
  
Applicable Compliance Method-  
Compliance with this emissions limitation shall be based upon the following:
  - i. Multiply the maximum paper usage of 550 lbs/hr by the emission factor of  $1.35 \times 10^{-4}$  lb formaldehyde/lb paper, as derived from the December, 1999 stack test.
  - ii. Multiply the maximum paper usage of 550 lbs/hr by the emission factor of  $2.865 \times 10^{-4}$  lb phenol/lb paper, as derived from the December, 1999 stack test.
  - iii. Multiply the maximum paper usage of 550 lbs/hr by the emission factor of  $6.975 \times 10^{-4}$  lb methanol/lb paper, as derived from the December, 1999 stack test.
  - iv. Multiply the maximum paper usage of 550 lbs/hr by the emission factor of  $1.75 \times 10^{-4}$  lb isopropanol/lb paper, as derived from the December, 1999 stack test.
  - v. Sum the products from i. through iv., for the total hourly OC emission rate in pounds.

Emission Limitation-  
0.16 ton/month OC

Applicable Compliance Method-  
Compliance with this emissions limitation shall be based upon the following:

- i. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 1.35 x 10<sup>-4</sup> lb formaldehyde/lb paper, as derived from the December, 1999 stack test.
- ii. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 2.865 x 10<sup>-4</sup> lb phenol/lb paper, as derived from the December, 1999 stack test.
- iii. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 6.975 x 10<sup>-4</sup> lb methanol/lb paper, as derived from the December, 1999 stack test.
- iv. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 1.75 x 10<sup>-4</sup> lb isopropanol/lb paper, as derived from the December, 1999 stack test.
- v. Sum the products from i. through iv., in lbs OC/month, for each month and divide by 2000 lbs/ton.

Emission Limitation-  
1.93 TPY OC

Applicable Compliance Method-

Compliance with this emissions limitation shall be based upon record keeping in Section C.2. and shall be the sum of the 12-monthly limits, in lbs, divided by 2000 lbs/ton.

Compliance with the facility wide HAP emission limitations in Section A.2.b. shall be demonstrated by the record keeping required in Section C.3.

F. **Miscellaneous Requirements**

- 1. In accordance with OAC rule 3745-35-07, the following terms in this permit are federally enforceable: A.2.b., C.3., D.2.b., D.2.c.

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Facility ID: 0819070018 Emissions Unit ID: P049 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

A. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P049 - Paper Curing Oven - 500 lbs/hr; Ov. 3003 with Regenerative Thermal Oxidizer	OAC rule 3745-31-05 (A)(3) PTI 08-04315	Organic Compounds (OC): 0.65 lb/hr, 0.15 ton/month, 1.76 TPY
		The requirements of this rule also include compliance with the requirements of OAC 3745-21-07 (G)(6)(a).
		Reference A.2.b.
	OAC rule 3745-35-07 (B) Synthetic Minor Title V	
	OAC rule 3745-21-07 (G)(6)(a)	Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.
	OAC rule 3745-21-07 (G)(1)	The requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).

2. **Additional Terms and Conditions**

- (a) The hourly emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure

compliance with these limitations.

The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

**B. Operational Restrictions**

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1650 degrees Fahrenheit.
2. The maximum paper usage rate for this emissions unit shall not exceed 228,083 lbs/month or 2,737,000 lbs/year, based on rolling, 12-month summations.

**C. Monitoring and/or Record Keeping Requirements**

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1650 degrees Fahrenheit.
  - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall collect and record the paper usage rate, in pounds, each month for this emissions unit.
  3. The permittee shall collect and record the following information each month for the entire facility.
    - a. The total individual Hazardous Air Pollutant (HAP)\* emission rate, in tons per month, for each HAP employed at this facility.
    - b. The total combined HAP emission rate, in tons per month, for all of the HAPs employed at this facility.
    - c. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.
    - d. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:
  - a. the paper usage limitations;
  - b. the individual facility HAP limitation; and
  - c. the combined facility HAP limitation
3. The permittee shall submit all reports required by this permit in accordance with the general terms and condition A.2.
4. The permittee shall submit annual reports which specify the individual HAP emission rate and the combined HAP emission rate from this facility. These reports shall be submitted to the Director (appropriate Ohio EPA District Office or local air agency) by January 31 of each year and shall cover the previous calendar year.

**E. Testing Requirements**

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation-  
0.65 lb/hr OC  
  
Applicable Compliance Method-  
Compliance with this emissions limitation shall be based upon the following:
  - i. Multiply the maximum paper usage of 500 lbs/hr by the emission factor of  $1.35 \times 10^{-4}$  lb formaldehyde/lb paper, as derived from the December, 1999 stack test.
  - ii. Multiply the maximum paper usage of 500 lbs/hr by the emission factor of  $2.865 \times 10^{-4}$  lb phenol/lb paper, as derived from the December, 1999 stack test.
  - iii. Multiply the maximum paper usage of 500 lbs/hr by the emission factor of  $6.975 \times 10^{-4}$  lb methanol/lb paper, as derived from the December, 1999 stack test.
  - iv. Multiply the maximum paper usage of 500 lbs/hr by the emission factor of  $1.75 \times 10^{-4}$  lb isopropanol/lb paper, as derived from the December, 1999 stack test.

- v. Sum the products from i. through iv., for the total hourly OC emission rate in pounds.

Emission Limitation-  
0.15 ton/month OC

Applicable Compliance Method-  
Compliance with this emissions limitation shall be based upon the following:

- i. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 1.35 x 10<sup>-4</sup> lb formaldehyde/lb paper, as derived from the December, 1999 stack test.
- ii. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 2.865 x 10<sup>-4</sup> lb phenol/lb paper, as derived from the December, 1999 stack test.
- iii. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 6.975 x 10<sup>-4</sup> lb methanol/lb paper, as derived from the December, 1999 stack test.
- iv. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 1.75 x 10<sup>-4</sup> lb isopropanol/lb paper, as derived from the December, 1999 stack test.
- v. Sum the products from i. through iv., in lbs OC/month, for each month and divide by 2000 lbs/ton.

Emission Limitation-  
1.76 TPY OC

Applicable Compliance Method-  
Compliance with this emissions limitation shall be based upon record keeping in Section C.2. and shall be the sum of the 12-monthly limits, in lbs, divided by 2000 lbs/ton.  
Compliance with the facility wide HAP emission limitations in Section A.2.b. shall be demonstrated by the record keeping required in Section C.3.

**F. Miscellaneous Requirements**

- 1. In accordance with OAC rule 3745-35-07, the following terms in this permit are federally enforceable: A.2.b., C.3., D.2.b., D.2.c.

\*\*\*THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION\*\*\*

Facility ID: 0819070018 Emissions Unit ID: P050 Issuance type: Final State Permit To Operate

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**Part II - Special Terms and Conditions**

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

- 1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
  - (a) None.
- 2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
  - (a) None.

**A. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P050 - Paper Curing Oven - 300 lbs/hr; Ov. 3004 with Regenerative Thermal Oxidizer	OAC rule 3745-31-05 (A)(3) PTI 08-04315	Organic Compounds (OC): 0.39 lb/hr, 0.09 ton/month, 1.06 TPY
		The requirements of this rule also include compliance with the requirements of OAC 3745-21-07 (G)(6)(a).
		Reference A.2.b.
	OAC rule 3745-35-07 (B) Synthetic Minor Title V	
	OAC rule 3745-21-07 (G)(6)(a)	Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.

OAC rule 3745-21-07 (G)(1)

The requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).

2. **Additional Terms and Conditions**
- (a) The hourly emission limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.
- B. **Operational Restrictions**
1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1650 degrees Fahrenheit.
2. The maximum paper usage rate for this emissions unit shall not exceed 136,875 lbs/month or 1,642,500 lbs/year, based on rolling, 12-month summations.
- C. **Monitoring and/or Record Keeping Requirements**
1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.
- The permittee shall collect and record the following information for each day:
- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1650 degrees Fahrenheit.
- b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall collect and record the paper usage rate, in pounds, each month for this emissions unit.
3. The permittee shall collect and record the following information each month for the entire facility.
- a. The total individual Hazardous Air Pollutant (HAP)\* emission rate, in tons per month, for each HAP employed at this facility.
- b. The total combined HAP emission rate, in tons per month, for all of the HAPs employed at this facility.
- c. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.
- d. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.
- D. **Reporting Requirements**
1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:
- a. the paper usage limitations;
- b. the individual facility HAP limitation; and
- c. the combined facility HAP limitation.
3. The permittee shall submit all reports required by this permit in accordance with the general terms and condition A.2.
4. The permittee shall submit annual reports which specify the individual HAP emission rate and the combined HAP emission rate from this facility. These reports shall be submitted to the Director (appropriate Ohio EPA District Office or local air agency) by January 31 of each year and shall cover the previous calendar year.
- E. **Testing Requirements**
1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:  
Emission Limitation-  
0.39 lb/hr OC
- Applicable Compliance Method-  
Compliance with this emissions limitation shall be based upon the following:
- i. Multiply the maximum paper usage of 300 lbs/hr by the emission factor of 1.35 x 10<sup>-4</sup> lb formaldehyde/lb paper, as derived from the December, 1999 stack test.

- ii. Multiply the maximum paper usage of 300 lbs/hr by the emission factor of  $2.865 \times 10^{-4}$  lb phenol/lb paper, as derived from the December, 1999 stack test.
- iii. Multiply the maximum paper usage of 300 lbs/hr by the emission factor of  $6.975 \times 10^{-4}$  lb methanol/lb paper, as derived from the December, 1999 stack test.
- iv. Multiply the maximum paper usage of 300 lbs/hr by the emission factor of  $1.75 \times 10^{-4}$  lb isopropanol/lb paper, as derived from the December, 1999 stack test.
- v. Sum the products from i. through iv., for the total hourly OC emission rate in pounds.

Emission Limitation-  
0.09 ton/month OC

Applicable Compliance Method-  
Compliance with this emissions limitation shall be based upon the following:

- i. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of  $1.35 \times 10^{-4}$  lb formaldehyde/lb paper, as derived from the December, 1999 stack test.
- ii. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of  $2.865 \times 10^{-4}$  lb phenol/lb paper, as derived from the December, 1999 stack test.
- iii. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of  $6.975 \times 10^{-4}$  lb methanol/lb paper, as derived from the December, 1999 stack test.
- iv. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of  $1.75 \times 10^{-4}$  lb isopropanol/lb paper, as derived from the December, 1999 stack test.
- v. Sum the products from i. through iv., in lbs OC/month, for each month and divide by 2000 lbs/ton.

Emission Limitation-  
1.06 TPY OC

Applicable Compliance Method-  
Compliance with this emissions limitation shall be based upon record keeping in Section C.2. and shall be the sum of the 12-monthly limits, in lbs, divided by 2000 lbs/ton.  
Compliance with the facility wide HAP emission limitations in Section A.2.b. shall be demonstrated by the record keeping required in Section C.3.

**F. Miscellaneous Requirements**

1. In accordance with OAC rule 3745-35-07, the following terms in this permit are federally enforceable: A.2.b., C.3., D.2.b., D.2.c.