



7/29/2014

Certified Mail

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1409010043
Permit Number: P0117051
Permit Type: Administrative Modification
County: Butler

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
Yes	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Journal News. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

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

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

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

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



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Wausau Paper Towel and Tissue LLC operates a secondary paper mill located at 700 Columbia Avenue, Middletown, Ohio. Raw material consists of various types of recycled waste paper which is pulped, bleached, de-inked, and furnished to the papermaking process. The papermaking output is converted into various tissue and towel products. The mill currently consists of coal-fired boilers, de-inking operations, and two paper machine lines. The facility is considered a major source for multiple pollutants. The facility boilers were issued a Title V operating permit on 6/18/2003, which expired in 7/2008 and a renewal application has been submitted. The facility papermaking operations were issued a Title V operating permit on 10/9/2001 which expired 8/2006 and a renewal application has been submitted. The boiler and papermaking operations previously had different operating entities (Mosinee Holdings and Bay West Paper Corporation, respectively); therefore separate Title V permits were issued. Both operating entities have now been combined into Wausau Paper Towel and Tissue LLC. Wausau Paper Towel and Tissue LLC is owned by Wausau Paper Corporation of Mosinee, Wisconsin.

Permit to Install (PTI) 14-05967 was issued 11/20/2007 for a Plant Expansion Project that involved the installation of a new broke system for waste paper/fiber recycling, modification to the drying hoods and capacity of an existing paper machine, and increases in cleaning solvent usage for off-line wire and felt cleaning operations associated with the existing paper machine lines. As a result of the new installation and modifications, existing papermaking, de-inking, and coal-fired boiler operations were modified to avoid subjecting the Plant Expansion Project to major modification new source review.

This permitting action (P0117051) is a facility-requested Administrative Modification to PTI 14-05967, issued 11/20/2007, for the boiler emissions units B001, B002, and B004 to modify the coal sampling procedure. Please note that emissions unit B003 was permanently shut down as of 1/1/2011. This PTI administrative modification is being processed in conjunction with the processing of the facility's Title V operating permit renewal.

3. Facility Emissions and Attainment Status:

The Wausau Paper Towel and Tissue LLC facility is located in Butler County, Ohio, which is currently non-attainment for VOCs (8-hour ozone standard), non-attainment for PM2.5 (as of 11/20/2007), and attainment for all other criteria pollutants. As of 11/20/2007, PM2.5 non-attainment rules for implementation were still under development and had not been finalized. Pursuant to USEPA interim guidance regarding regulation of PM2.5 emissions, PM10 is considered a surrogate for PM2.5 for the purposes of PTI 14-05967, therefore all PM10 netting determinations, modeling, and emission limitations are considered to be compliance with PM2.5 requirements.

The facility potential to emit is greater than 100 tons for VOCs, NOx, SO2, PE, PM10, and CO from existing sources such as the coal-fired boilers, paper machines, and recycled paper de-inking systems.



The permittee requested that PTI 14-05967 be issued as a netting PTI with federally enforceable emission limitations (synthetic minor) on VOC and PM10 (as surrogate to PM2.5) to avoid triggering a major modification under non-attainment new source review (NSR) and with federally enforceable emission limitations on PE, NOx, and SO2 to avoid triggering a major modification under Prevention of Significant Deterioration (PSD).

4. Source Emissions:

Nine (9) emissions units were included in PTI 14-05967 and were subjected to new and/or modified federally enforceable limitations/restrictions in order to avoid major NSR. Of the nine emissions units, one was a new source identified as the broke system (P107), which was a new source of VOC emissions. Existing emission units for paper making (P101 and P102) were modified to increase the capacity of P101 and to increase the usage of cleaning solvent from off-line wire and felt cleaning operations in the paper making process. In PTI 14-05967, existing paper making emissions units (P101 and P102) were modified to impose federally enforceable material processing limitations across all paper making operations combined at 145,845 tons of machine dried paper and a VOC input restriction on off-line cleaning of 39.0 tons as rolling 12-month summations. Existing de-inking emissions units (P103 and P104) were modified to impose a federally enforceable material processing limitation across all de-inking operations and the new broke system (P107), combined, at 300,000 tons of machine dried paper input as a rolling 12-month summation. Due to the modification of the natural gas/propane-fired drying hoods on P101 to increase paper making capacity, existing paper making emissions units (P101 and P102) have been modified to impose federally enforceable emissions limitations across all paper making drying hood operations combined at 1.07 tons per year of PE and 2.59 tons per year of PM10, when burning any combination of natural gas or propane, as rolling 12-month summations. In addition, an existing 39.9 TPY NOx emission limitation on the drying hoods on emission units P101 and P102 from previous synthetic minor permit actions for PSD avoidance (PTI No. 14-04391 issued 3/25/1998 and PTI No. 14-04560 issued 3/18/2004) was carried forward into PTI 14-05967. Lastly, for the PTI 14-05967 permitting action issued 11/20/2007, the four (4) existing coal-fired boilers (B001-B004), previously not subject to any annual emission limitations or BAT, were modified to impose federally enforceable fuel usage and emission limitations in order for the entire Plant Expansion Project to avoid triggering major NSR for any of the criteria pollutants (PE, PM10, SO2, NOx, VOC, CO). All these federally enforceable emission limitations, operating restrictions, and associated record keeping and reporting were to ensure that the Plant Expansion Project avoided major modification non-attainment NSR and PSD.

This permitting action (P0117051) is a facility-requested Administrative Modification to PTI 14-05967, issued 11/20/2007, for the boiler emissions units B001, B002, and B004 to modify the coal sampling procedure. Please note that emissions unit B003 was permanently shut down as of 1/1/2011. This PTI administrative modification is being processed in conjunction with the processing of the facility's Title V operating permit renewal.

5. Conclusion:

For the PTI 14-05967 permitting action issued 11/20/2007, the permittee proposed a 145,845 ton per year material throughput restriction and 39.0 ton per year VOC input restriction for off-line cleaning on existing paper machines P101 and P102, combined; an emission limitation on PE and PM10 emissions from the drying hoods on paper machines P101 and P102, combined, when burning either natural gas or propane; a 300,000 ton per year material throughput restriction on the new broke system and existing de-inking operations P103, P104, and P107, combined; and accepted the terms and conditions of this permit which will limit the PM10 (as surrogate to PM2.5) and VOC emissions as a Synthetic



Minor to avoid major modification non-attainment NSR. In addition, for the PTI 14-05967 permitting action issued 11/20/2007, the permittee proposed a 49,500 ton per year coal usage restriction and 100,000 gallon per year fuel oil restriction on existing coal boilers B001-B004, combined, in order to combine netting calculations with the Synthetic Minor limitations so that the overall impact of the plant expansion project would not trigger non-attainment NSR and PSD for any of the criteria pollutants. PTI 14-05967 also contained an existing 39.9 TPY NOx emission limitation on the drying hoods on emission units P101 and P102 from previous synthetic minor permit actions (PTI No. 14-04391 issued 3/25/1998 and PTI No. 14-04560 issued 3/18/2004) to ensure that the facility continued to avoid triggering PSD. The facility maintains records and is subject to reporting as outlined in the permit to ensure compliance with the voluntary netting and Synthetic Minor limitations.

This permitting action (P0117051) is a facility-requested Administrative Modification to PTI 14-05967, issued 11/20/2007, for the boiler emissions units B001, B002, and B004 to modify the coal sampling procedure. Please note that emissions unit B003 was permanently shut down as of 1/1/2011. This PTI administrative modification is being processed in conjunction with the processing of the facility's Title V operating permit renewal.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	38.02
PM10	38.03
SO2	896.62
NOx	545.70
VOC	1.50
CO	12.63

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Wausau Paper Towel & Tissue, LLC

Issue Date: 7/29/2014

Permit Number: P0117051

Permit Type: Administrative Modification

Permit Description: Facility-requested Administrative Modification to modify coal sampling procedure for emissions units B001, B002, and B004.

Facility ID: 1409010043

Facility Location: Wausau Paper Towel & Tissue, LLC

700 Columbia Ave.,

Middletown, OH 45042

Facility Description: Paper (except Newsprint) Mills

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



DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
Wausau Paper Towel & Tissue, LLC**

Facility ID:	1409010043
Permit Number:	P0117051
Permit Type:	Administrative Modification
Issued:	7/29/2014
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Wausau Paper Towel & Tissue, LLC

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Draft Permit-to-Install
Wausau Paper Towel & Tissue, LLC
Permit Number: P0117051
Facility ID: 1409010043
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1409010043
Facility Description: Paper products.
Application Number(s): M0002809
Permit Number: P0117051
Permit Description: Facility-requested Administrative Modification to modify coal sampling procedure for emissions units B001, B002, and B004.
Permit Type: Administrative Modification
Permit Fee: \$900.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 7/29/2014
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Wausau Paper Towel & Tissue, LLC
700 Columbia Ave.
Middletown, OH 45042

of a Permit-to-Install for the emissions unit(s) identified on the following page.

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 Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Permit-to-Install
Wausau Paper Towel & Tissue, LLC
Permit Number: P0117051
Facility ID: 1409010043
Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0117051

Permit Description: Facility-requested Administrative Modification to modify coal sampling procedure for emissions units B001, B002, and B004.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	B001
Company Equipment ID:	Boiler No. 1 (MHI)
Superseded Permit Number:	14-05967
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B002
Company Equipment ID:	Boiler No. 2 (MHI)
Superseded Permit Number:	14-05967
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B004
Company Equipment ID:	Boiler No. 4 (MHI)
Superseded Permit Number:	14-05967
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
Wausau Paper Towel & Tissue, LLC
Permit Number: P0117051
Facility ID: 1409010043
Effective Date: To be entered upon final issuance

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.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying 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.

4. 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, 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.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Southwest Ohio Air Quality Agency.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Southwest Ohio Air Quality Agency. The written 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. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Southwest Ohio Air Quality Agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted



local air 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 electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (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 ORC section 3704.08.
 - (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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.



8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the



Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit 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) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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



13. Construction Compliance Certification

The applicant shall identify the following dates in the “Air Services” facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

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

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.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the “Owner/Contact Change” functionality in “Air Services” once the transfer is legally completed. The change must be submitted through “Air Services” within thirty days of the ownership transfer date.

18. Risk Management Plans

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

19. 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.



Draft Permit-to-Install
Wausau Paper Towel & Tissue, LLC
Permit Number: P0117051
Facility ID: 1409010043
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install
Wausau Paper Towel & Tissue, LLC
Permit Number: P0117051
Facility ID: 1409010043

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The Ohio EPA has determined that this facility may be subject to U.S. EPA standards for control of hazardous air pollutants (HAP), the National Emission Standards for Hazardous Air Pollutants (NESHAP), found in the Code of Federal Regulations, Title 40 Part 63. At this time the Ohio EPA is not accepting the delegating authority to enforce NESHAP standards for area sources. The requirements of this NESHAP, that are applicable to the area source(s) (for HAP) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of the applicable 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.



Draft Permit-to-Install
Wausau Paper Towel & Tissue, LLC
Permit Number: P0117051
Facility ID: 1409010043
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



Effective Date: To be entered upon final issuance

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

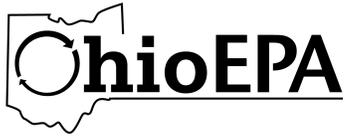
a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(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) <i>Voluntary Restrictions to Avoid Non-Attainment New Source Review and Prevention of Significant Deterioration</i>	See b)(2)a., b)(2)b., b)(2)c., c)(2), and c)(3).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified 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 (SO ₂) emissions shall not exceed 1.4 pounds per MMBtu of actual heat input. See b)(2)d.



(2) Additional Terms and Conditions

- a. This emissions unit shall not exceed the following particulate emission (PE) and particulate matter 10 microns and less in diameter (PM10) emission limitation, when burning coal, in combination with the stated annual coal usage rate in c)(3):
 - i. 0.06 pound of PE/PM10 per MMBtu of actual heat input.
- b. The maximum total annual emissions from emissions units B001, B002, B003, and B004, combined, shall not exceed the following emission limitations based upon a rolling, 12-month summation:
 - i. 38.02 tons per year of PE;
 - ii. 38.03 tons per year of PM10;
 - iii. 896.62 tons per year of SO₂;
 - iv. 545.70 tons per year of nitrogen oxides (NO_x) emissions;
 - v. 1.50 tons per year of volatile organic compound (VOC) emissions; and
 - vi. 12.63 tons per year of carbon monoxide (CO) emissions.
- c. The permittee shall operate the multiclone and venturi scrubber at all times when this emissions unit is in operation.
- d. The emissions unit shall be vented to a stack no lower than two hundred feet above ground level.
- e. 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.

c) Operational Restrictions

- (1) The permittee shall burn only coal or No. 2 fuel oil in this emissions unit.
- (2) The maximum annual No. 2 fuel oil usage rate for emissions units B001, B002, B003, and B004, combined, shall not exceed 100,000 gallons per year, based upon a rolling, 12-month summation of fuel oil usage.

The permittee has existing records to demonstrate compliance upon issuance of this permit, therefore first year monthly fuel oil usage amounts are not necessary.

- (3) The annual ton per year emission limitations specified in b)(2)b. above for PE, PM10, SO₂, NO_x, VOC, and CO are based upon a maximum annual coal usage rate for emissions units B001, B002, B003, and B004, combined, of 49,500 tons per year as a rolling, 12-month summation of coal usage.



The permittee has existing records to demonstrate compliance upon issuance of this permit, therefore first year monthly coal usage amounts are not necessary.

- (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.
- (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.
- (6) When this emissions unit is in operation:
 - a. the pressure drop across the scrubber shall be continuously monitored and maintained, at all times the emissions unit is in operation, at a value of not less than 8 inches of water; and
 - b. the scrubber water flow rate shall be continuously monitored and maintained, at all times the emissions unit is in operation, at a value of not less than the minimum water flow rate (in gallons per minute) established during the most recent emissions test that demonstrated the emissions unit to be in compliance.

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

On a routine basis, not to be less than five (5) days in any given week when one or more of the emission units B001, B002, B003, or B004 is in operation, the permittee shall collect a sample from the coal handling system at a point after the coal exits the crusher. At the end of each week, the permittee shall prepare a weekly composite sample by combining equal amounts of coal taken from each daily sample. At the end of each month, the permittee shall prepare a representative monthly sample for laboratory testing by combining equal amounts of coal taken from each weekly composite sample.

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, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865 Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.



- (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).
- (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.
- (5) The permittee shall properly install, operate, and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.

The permittee shall collect and record the following information each day, on a once per shift basis, when burning coal:

- a. the pressure drop across the scrubber, in inches of water; and
 - b. the scrubber water flow rate, in gallons per minute.
- (6) The permittee shall collect and record the following information each month for emissions units B001, B002, B003, 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, NO_x, VOC, and CO for each month; and



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

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.
- (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.

- (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.

- (4) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at the levels required in this permit:
 - a. the static pressure drop across the scrubber; and
 - b. the scrubber water flow rate.



- (5) 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, B003, 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, B003, 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, NO_x, VOC, and CO for emissions units B001, B002, B003, and B004, combined, as specified in b)(2)b.

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

- (6) The permittee shall submit annual reports which specify the total PE, PM10, SO₂, NO_x, 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.
- (7) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

- a. 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).

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.

c. Emission Limitation:

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

Applicable Compliance Method:

If required, 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).

d. Emission Limitations:

The total annual emissions from emissions units B001, B002, B003, and B004, combined, shall not exceed the following as rolling, 12-month summations:

38.02 TPY of PE;

38.03 TPY of PM₁₀;

896.62 TPY of SO₂;

545.70 TPY of NO_x;

1.50 TPY of VOC; and

12.63 TPY of CO.



Applicable Compliance Method:

Compliance with the VOC, NO_x, and CO emission limitations specified above shall be determined by the record keeping requirements specified in d)(6) 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 PE and PM₁₀ emission limitations specified above shall be determined by the record keeping requirements specified in d)(6) and emission testing required in f)(1)e. of this permit.

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 3 months after startup of new emissions unit P107 or within 3 months after modification of existing emissions units P101 and P102, whichever is latest, as identified in Permit to Install 14-05967, issued 11/20/2007; unless otherwise approved by Southwest Ohio Air Quality Agency to coincide with the required periodic testing pursuant to the terms and conditions for this emissions unit contained in the permittee's Title V Operating Permit.
- 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 Method 202

If the permittee demonstrates to the Southwest Ohio Air Quality Agency that Method 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 shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Southwest Ohio Air Quality Agency.



- 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.
- (2) Compliance with the rolling 12-month No. 2 fuel oil usage restriction in c)(2) shall be determined by the record keeping requirements in d)(6).
 - (3) Compliance with the rolling 12-month coal usage restriction in c)(3) shall be determined by the record keeping requirements in d)(6).
- g) **Miscellaneous Requirements**
- (1) As identified in PTI 14-05967, issued 11/20/2007, this source is located in an area that was designated as non-attainment for Particulate Matter less than 2.5 microns (PM_{2.5}) under the National Ambient Air Quality Standards (NAAQS) effective April 5, 2005. Regulations have not yet been promulgated to implement non-attainment new source review for PM_{2.5}. In the absence of implementation regulations, the USEPA issued interim guidance on April 5, 2005, regarding how to address PM_{2.5} during new source review. For the purpose of the permit to install, pursuant to this USEPA guidance, PM₁₀ was considered a surrogate for PM_{2.5}. Since the PM₁₀ emissions are less than the major modification threshold, the non-attainment new source review requirements do not apply for PM₁₀ and PM_{2.5}.



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) <i>Voluntary Restriction to Avoid Non-Attainment New Source Review and Prevention of Significant Deterioration</i>	See b)(2)a., b)(2)b., b)(2)c., c)(2), and c)(3).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified 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 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 (SO ₂) emissions shall not exceed 1.4 pounds per MMBtu of actual heat input. See b)(2)d.



(2) Additional Terms and Conditions

- a. This emissions unit shall not exceed the following particulate emission (PE) and particulate matter 10 microns and less in diameter (PM10) emission limitation, when burning coal, in combination with the stated annual coal usage rate in c)(3):
 - i. 0.06 pound of PE/PM10 per MMBtu of actual heat input.
- b. The maximum total annual emissions from emissions units B001, B002, B003, and B004, combined, shall not exceed the following emission limitations based upon a rolling, 12-month summation:
 - i. 38.02 tons per year of PE;
 - ii. 38.03 tons per year of PM10;
 - iii. 896.62 tons per year of SO₂;
 - iv. 545.70 tons per year of nitrogen oxides (NO_x) emissions;
 - v. 1.50 tons per year of volatile organic compound (VOC) emissions; and
 - vi. 12.63 tons per year of carbon monoxide (CO) emissions.
- c. The permittee shall operate the multiclone and venturi scrubber at all times when this emissions unit is in operation.
- d. This emissions unit shall be vented to a stack no lower than two hundred feet above ground level.
- e. 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.

c) Operational Restrictions

- (1) The permittee shall burn only coal or No. 2 fuel oil in this emissions unit.
- (2) The maximum annual No. 2 fuel oil usage rate for emissions units B001, B002, B003, and B004, combined, shall not exceed 100,000 gallons per year, based upon a rolling, 12-month summation of the monthly fuel oil usage.

The permittee has existing records to demonstrate compliance upon issuance of this permit, therefore first year monthly fuel oil usage amounts are not necessary.
- (3) The annual ton per year emission limitations specified in b)(2)b. above for PE, PM10, SO₂, NO_x, VOC, and CO are based upon a maximum annual coal usage rate for emissions units B001, B002, B003, and B004, combined, of 49,500 tons per year as a rolling, 12-month summation of coal usage.



The permittee has existing records to demonstrate compliance upon issuance of this permit, therefore first year monthly coal usage amounts are not necessary.

- (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.
- (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.
- (6) When this emissions unit is in operation:
 - a. the pressure drop across the scrubber shall be continuously monitored and maintained, at all times the emissions unit is in operation, at a value of not less than 8 inches of water; and
 - b. the scrubber water flow rate shall be continuously monitored and maintained, at all times the emissions unit is in operation, at a value of not less than the minimum water flow rate (in gallons per minute) established during the most recent emissions test that demonstrated the emissions unit to be in compliance.

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

On a routine basis, not to be less than five (5) days in any given week when one or more of the emission units B001, B002, B003, or B004 is in operation, the permittee shall collect a sample from the coal handling system at a point after the coal exits the crusher. At the end of each week, the permittee shall prepare a weekly composite sample by combining equal amounts of coal taken from each daily sample. At the end of each month, the permittee shall prepare a representative monthly sample for laboratory testing by combining equal amounts of coal taken from each weekly composite sample.

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, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865 Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.



- (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).
- (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.
- (5) The permittee shall properly install, operate, and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day, on a once per shift basis, when burning coal:

- a. the pressure drop across the scrubber, in inches of water; and
 - b. the scrubber water flow rate, in gallons per minute.
- (6) The permittee shall collect and record the following information each month for emissions units B001, B002, B003, 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, NO_x, VOC, and CO for each month; and



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

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.
- (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.

- (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.

- (4) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at the levels required in this permit:
 - a. the static pressure drop across the scrubber; and
 - b. the scrubber water flow rate.



- (5) 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, B003, 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, B003, 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, NO_x, VOC, and CO for emissions units B001, B002, B003, and B004, combined, as specified in b)(2)b.

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

- (6) The permittee shall submit annual reports which specify the total PE, PM10, SO₂, NO_x, 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.
- (7) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:

PE shall not exceed 0.02 pound per MMBtu of actual heat input when firing 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).



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.

c. Emission Limitation:

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

Applicable Compliance Method:

If required, 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).

d. Emission Limitations:

The total annual emissions from emissions units B001, B002, B003, and B004, combined, shall not exceed the following as rolling, 12-month summations:

38.02 TPY of PE;

38.03 TPY of PM₁₀;

896.62 TPY of SO₂;

545.70 TPY of NO_x;

1.50 TPY of VOC; and

12.63 TPY of CO.

Applicable Compliance Method:

Compliance with the SO₂, VOC, NO_x, and CO emission limitations specified above shall be determined by the record keeping requirements specified in d)(6)



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 PE and PM10 emission limitations specified above shall be determined by the record keeping requirements specified in d)(6) and emission testing required in f)(1)e. of this permit.

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 3 months after startup of new emissions unit P107 or within 3 months after modification of existing emissions units P101 and P102, whichever is latest, as identified in Permit to Install 14-05967, issued 11/20/2007; unless otherwise approved by Southwest Ohio Air Quality Agency to coincide with the required periodic testing pursuant to the terms and conditions for this emissions unit contained in the permittee's Title V Operating Permit.

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 Method 202

If the permittee demonstrates to the Southwest Ohio Air Quality Agency that Method 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 shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Southwest Ohio Air Quality Agency.

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.

- 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.
- (2) Compliance with the rolling 12-month No. 2 fuel oil usage restriction in c)(2) shall be determined by the record keeping requirements in d)(6).
 - (3) Compliance with the rolling 12-month coal usage restriction in c)(3) shall be determined by the record keeping requirements in d)(6).
- g) **Miscellaneous Requirements**
- (1) As identified in PTI 14-05967, issued 11/20/2007, this source is located in an area that was designated as non-attainment for Particulate Matter less than 2.5 microns (PM_{2.5}) under the National Ambient Air Quality Standards (NAAQS) effective April 5, 2005. Regulations have not yet been promulgated to implement non-attainment new source review for PM_{2.5}. In the absence of implementation regulations, the USEPA issued interim guidance on April 5, 2005, regarding how to address PM_{2.5} during new source review. For the purpose of the permit to install, pursuant to this USEPA guidance, PM₁₀ was considered a surrogate for PM_{2.5}. Since the PM₁₀ emissions are less than the major modification threshold, the non-attainment new source review requirements do not apply for PM₁₀ and PM_{2.5}.



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) <i>Voluntary Restriction to Avoid Non-Attainment New Source Review and Prevention of Significant Deterioration</i>	See b)(2)a., b)(2)b., b)(2)c., c)(2), and c)(3).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified 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 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 (SO ₂) emissions shall not exceed 1.4 pounds per MMBtu of actual heat input. See b)(2)d.



(2) Additional Terms and Conditions

- a. This emissions unit shall not exceed the following particulate emission (PE) and particulate matter 10 microns and less in diameter (PM10) emission limitation, when burning coal, in combination with the stated annual coal usage rate in c)(3):
 - i. 0.06 pound of PE/PM10 per mmBtu of actual heat input.
- b. The maximum total annual emissions from emissions units B001, B002, B003, and B004, combined, shall not exceed the following emission limitations based upon a rolling, 12-month summation:
 - i. 38.02 tons per year of PE;
 - ii. 38.03 tons per year of PM10;
 - iii. 896.62 tons per year of SO₂;
 - iv. 545.70 tons per year of nitrogen oxides (NO_x) emissions;
 - v. 1.50 tons per year of volatile organic compound (VOC) emissions; and
 - vi. 12.63 tons per year of carbon monoxide (CO) emissions.
- c. The permittee shall operate the multiclone and venturi scrubber at all times when this emissions unit is in operation.
- d. This emissions unit shall be vented to a stack no lower than two hundred feet above ground level.
- e. 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.

c) Operational Restrictions

- (1) The permittee shall burn only coal or No. 2 fuel oil in this emissions unit.
- (2) The maximum annual No. 2 fuel oil usage for emissions units B001, B002, B003, and B004, combined, shall not exceed 100,000 gallons per year, based upon a rolling, 12-month summation of fuel oil usage.

The permittee has existing records to demonstrate compliance upon issuance of this permit, therefore first year monthly fuel oil usage amounts are not necessary.
- (3) The annual ton per year emission limitations specified in b)(2)b. above for PE, PM10, SO₂, NO_x, VOC, and CO are based upon a maximum annual coal usage rate for emissions units B001, B002, B003, and B004, combined, of 49,500 tons per year, as a rolling, 12-month summation of coal usage.



The permittee has existing records to demonstrate compliance upon issuance of this permit, therefore first year monthly coal usage amounts are not necessary.

- (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.
- (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.
- (6) When this emissions unit is in operation:
 - a. the pressure drop across the scrubber shall be continuously monitored and maintained, at all times the emissions unit is in operation, at a value of not less than 8 inches of water; and
 - b. the scrubber water flow rate shall be continuously monitored and maintained, at all times the emissions unit is in operation, at a value of not less than the minimum water flow rate (in gallons per minute) established during the most recent emissions test that demonstrated the emissions unit to be in compliance.

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

On a routine basis, not to be less than five (5) days in any given week when one or more of the emission units B001, B002, B003, or B004 is in operation, the permittee shall collect a sample from the coal handling system at a point after the coal exits the crusher. At the end of each week, the permittee shall prepare a weekly composite sample by combining equal amounts of coal taken from each daily sample. At the end of each month, the permittee shall prepare a representative monthly sample for laboratory testing by combining equal amounts of coal taken from each weekly composite sample.

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, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865 Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.



- (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).
- (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.
- (5) The permittee shall properly install, operate, and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day, on a once per shift basis, when burning coal:

- a. the pressure drop across the scrubber, in inches of water; and
 - b. the scrubber water flow rate, in gallons per minute.
- (6) The permittee shall collect and record the following information each month for emissions units B001, B002, B003, 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, NO_x, VOC, and CO for each month; and



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

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.
- (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.

- (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.

- (4) The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at the levels required in this permit:
 - a. the static pressure drop across the scrubber; and
 - b. the scrubber water flow rate.



- (5) 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, B003, 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, B003, 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, NO_x, VOC, and CO for emissions units B001, B002, B003, and B004, combined, as specified in b)(2)b.

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

- (6) The permittee shall submit annual reports which specify the total PE, PM10, SO₂, NO_x, 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.
- (7) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:

PE shall not exceed 0.02 pound per MMBtu of actual heat input when firing 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).



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.

c. Emission Limitation:

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

Applicable Compliance Method:

If required, 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).

d. Emission Limitations:

The total annual emissions from emissions units B001, B002, B003, and B004, combined, shall not exceed the following as rolling, 12-month summations:

38.02 TPY of PE;

38.03 TPY of PM₁₀;

896.62 TPY of SO₂;

545.70 TPY of NO_x;

1.50 TPY of VOC; and

12.63 TPY of CO.

Applicable Compliance Method:

Compliance with the SO₂, VOC, NO_x, and CO emission limitations specified above shall be determined by the record keeping requirements specified in d)(6)



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 PE and PM10 emission limitations specified above shall be determined by the record keeping requirements specified in d)(6) and emission testing required in f)(1)e. of this permit.

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 3 months after startup of new emissions unit P107 or within 3 months after modification of existing emissions units P101 and P102, whichever is latest, as identified in Permit to Install 14-05967, issued 11/20/2007; unless otherwise approved by Southwest Ohio Air Quality Agency to coincide with the required periodic testing pursuant to the terms and conditions for this emissions unit contained in the permittee's Title V Operating Permit.

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 Method 202

If the permittee demonstrates to the Southwest Ohio Air Quality Agency that Method 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 shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Southwest Ohio Air Quality Agency.

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.
- (2) Compliance with the rolling 12-month No. 2 fuel oil usage restriction in c)(2) shall be determined by the record keeping requirements in d)(6).
 - (3) Compliance with the rolling 12-month coal usage restriction in c)(3) shall be determined by the record keeping requirements in d)(6).
- g) **Miscellaneous Requirements**
- (1) As identified in PTI 14-05967, issued 11/20/2007, this source is located in an area that was designated as non-attainment for Particulate Matter less than 2.5 microns (PM_{2.5}) under the National Ambient Air Quality Standards (NAAQS) effective April 5, 2005. Regulations have not yet been promulgated to implement non-attainment new source review for PM_{2.5}. In the absence of implementation regulations, the USEPA issued interim guidance on April 5, 2005, regarding how to address PM_{2.5} during new source review. For the purpose of the permit to install, pursuant to this USEPA guidance, PM₁₀ was considered a surrogate for PM_{2.5}. Since the PM₁₀ emissions are less than the major modification threshold, the non-attainment new source review requirements do not apply for PM₁₀ and PM_{2.5}.