



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION  
BUTLER COUNTY  
Application No: 14-04175  
Fac ID: 1409010021**

**CERTIFIED MAIL**

**DATE: 9/5/2006**

Altivity Packaging  
Win Edge  
407 Charles Street  
Middletown, OH 45042

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **\$ 200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

HCDES

OH-KY-IN Reg Council of Govs

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IN

**BUTLER COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-04175 FOR AN AIR CONTAMINANT SOURCE FOR  
Activity Packaging**

On 9/5/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Activity Packaging**, located at **407 Charles Street, Middletown, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-04175:

**Administrative modification to remove combined emissions limits for boilers B005 and B006 following the removal of boiler B003.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Brad Miller, Hamilton County Department of Environmental Services, 250 William Howard Taft Pkwy,  
Cincinnati, OH 45219-2660 [(513)946-7777]



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT MODIFICATION OF PERMIT TO INSTALL 14-04175**

Application Number: 14-04175  
Facility ID: 1409010021  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Altivity Packaging  
Person to Contact: Win Edge  
Address: 407 Charles Street  
Middletown, OH 45042

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**407 Charles Street  
Middletown, Ohio**

Description of proposed emissions unit(s):  
**Administrative modification to remove combined emissions limits for boilers B005 and B006 following the removal of boiler B003.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

**Part I - GENERAL TERMS AND CONDITIONS**

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

**1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air 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.
  - iv. If this permit is for an emissions unit located at a Title V facility, then 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.

## **2. Scheduled Maintenance/Malfunction Reporting**

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

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

## **3. Risk Management Plans**

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

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permittee shall comply with the requirement to register such a plan.

**4. Title IV Provisions**

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

**5. Severability Clause**

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

**6. General Requirements**

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

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permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

**7. Fees**

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

**8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any 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. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

**9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

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- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

#### **10. Permit-To-Operate Application**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

#### **11. Best Available Technology**

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

#### **12. Air Pollution Nuisance**

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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.

**13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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

**1. Compliance Requirements**

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

**2. 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 appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**3. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

**4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing 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 modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

**5. Construction of New Sources(s)**

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.

**6. 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.

**7. 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).

**8. Construction Compliance Certification**

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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

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

**C. Permit-To-Install Summary of Allowable Emissions**

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

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

<b><u>Pollutant</u></b>	<b><u>Tons Per Year</u></b>
VOC	15.8
PM/PM10	12.6
SO2	195.5
NOx	113.5
CO	100.9

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## Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

1. This air permit to install (PTI) shall cover the Boiler Replacement Project at the Altivity Packaging facility which involves the replacement of coal fired boiler (Ohio EPA emissions units 1409010021 B003) with two new gas/Number 2 oil fired boilers (B005 and B006.)

The federally enforceable terms and conditions of this PTI have been included for the purpose of netting out of Non-Attainment New Source Review (NNSR) and corresponding Ohio Administrative Code (OAC) regulations for nitrogen oxides (NOx), and netting out of Prevention of Significant Deterioration (PSD) for nitrogen oxides (NOx), sulfur dioxide (SO<sub>2</sub>), and carbon monoxide (CO) emissions. In order to verify that the emissions of these pollutants do not exceed the allowable emission rates described in the netting table below, the permittee must comply with the limitations specified in each emission unit's respective terms and conditions. The other pollutants were considered in the context of the project's analysis, however they were not major for this project.

Following the NSR definitions in OAC rule 3745-31-01(III) and OAC rule 3745-31-01(O), the actual baseline emissions were based on the two years prior to the date of the original permit application for the Boiler Replacement Project, submitted May 29, 1996. Altivity Packaging used the period of 1994 - 1995 as the baseline for emissions calculations of the following pollutants: nitrogen oxides (NOx), sulfur dioxide (SO<sub>2</sub>), and carbon monoxide (CO) emissions.

The following table summarizes the netting emissions. It includes all actual emissions from the coal boiler (B003) at the Altivity Packaging facility that are being used in the baseline emissions calculation and the two proposed gas/oil boilers in the potential emissions that demonstrates a significant emissions increase and a significant net emission increase of PE, PM<sub>10</sub>, SO<sub>2</sub>, NOx, VOC, and CO does not occur as a result of the Boiler Replacement Project. Note that the net SO<sub>2</sub> and NOx emissions are actually an emissions decrease.

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

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

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

None

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

**A. State and Federally Enforceable Section**

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

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

**Operations, Property, and/or Equipment - (B005) - 72 mmBtu/hr natural gas or No. 2 oil fired boiler No. 1**

<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
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OAC rule 3745-31-05(A)(3)	<p>When burning natural gas:</p> <p>Particulate Emissions (PE) and emissions of Particulate Matter less than 10 microns in diameter (PM10) shall not exceed 0.01 lb/mmBtu of actual heat input.</p> <p>Sulfur Dioxide (SO<sub>2</sub>) emissions shall not exceed 0.001 lb/mmBtu of actual heat input.</p> <p>Nitrogen Oxides (NO<sub>x</sub>) emissions shall not exceed 0.10 lb/mmBtu of actual heat input.</p> <p>Carbon Monoxide (CO) emissions shall not exceed 0.16 lb/mmBtu of actual heat input.</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 0.016 lb/mmBtu of actual heat input.</p> <p>When burning Number 2 fuel oil:</p> <p>Particulate Emissions (PE) and emissions of Particulate Matter less than 10 microns in diameter (PM10) shall not exceed 0.02 lb/mmBtu of actual heat input.</p> <p>Sulfur Dioxide (SO<sub>2</sub>) emissions shall not exceed 0.31 lb/mmBtu of actual heat input.</p> <p>Nitrogen Oxides (NO<sub>x</sub>) emissions shall not exceed 0.18 lb/mmBtu of actual heat input.</p> <p>Carbon Monoxide (CO) emissions shall not exceed 0.16 lb/mmBtu of actual heat input.</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 0.025 lb/mmBtu of actual heat input.</p> <p>See terms and conditions A.I.2.b, and A.II.1 through A.II.2.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-08(B), OAC rule 3745-23-06(B) and 40 CFR Part 60 Subpart Dc.</p>
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OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-10(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-18-06	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
40 CFR Part 60 Subpart Dc	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except for one six-minute period per hour of not more than 27% opacity.
OAC rule 3745-21-08(B)	See term and condition A.I.2.c.
OAC rule 3745-23-06(B)	See term and condition A.I.2.d.

**2. Additional Terms and Conditions**

- 2.a** The lb/mmBtu emission limitations outlined in term A.I.1, except for SO<sub>2</sub> emissions when firing fuel oil, are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these emission limitations.

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- 2.b** The maximum total annual emissions from emissions units B005 and B006, combined, shall not exceed the following rates based upon a rolling, 12-month summation:

113.5 TPY of nitrogen oxides (NO<sub>x</sub>).

195.5 TPY of sulfur dioxide (SO<sub>2</sub>);

100.9 TPY of carbon monoxide (CO).

12.6 tons per year (TPY) of particulate emissions (PE) and PM<sub>10</sub>; and

15.8 TPY of volatile organic compounds (VOC).

- 2.c** The permittee satisfies the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-08 by complying with the best available technology requirements of OAC rule 3745-31-05(A)(3).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.d** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

On February 15, 2005, OAC rule 3745-23-06 was rescinded and therefore no longer a part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-23-06, the requirement to satisfy "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.e** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are

Emissions Unit ID: B005

also federally enforceable.

- 2.f** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the visible emissions limitation, the mass emission limitations and the use of natural gas and/or Number 2 fuel oil.

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**II. Operational Restrictions**

1. The permittee shall burn only natural gas and/or number 2 fuel oil in this emissions unit.
2. The quality of number 2 fuel oil received for burning in this emissions unit shall have a combination of sulfur content and heat content sufficient to comply with the allowable sulfur dioxide emission limitation of 0.31 lb/mmBtu of actual heat input and a sulfur content limit of less than or equal to 0.3 percent sulfur by weight.

**III. Monitoring and/or Recordkeeping Requirements**

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

a. Alternative 1:

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

b. Alternative 2:

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

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accordance with the formula specified in OAC rule 3745-18-04(F)].

- c. 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.

Emissions Unit ID: B005

2. The permittee shall maintain monthly records of the following information for emissions units B005 and B006, combined:
  - a. the usage rates for each fuel (natural gas and Number 2 fuel oil) burned;
  - b. the rolling, 12-month summation of the natural gas and Number 2 fuel oil usage rates;
  - c. the type and total amount of fuel, other than natural gas or Number 2 fuel oil, burned in this emissions unit.

The permittee currently maintains records capable of demonstrating compliance with this requirement.

3. The permittee shall maintain monthly records of the following information for emissions units B005 and B006, combined, in order to monitor compliance with the rolling, 12-month summation emissions limitations:
  - a. the total emissions, in tons, for PE/PM10, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC when burning any combination of fuels;
  - b. the rolling, 12-monthly summation emissions total, in tons, for PE/PM10, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC when burning any combination of fuels (the total amount of emissions calculated for the current month plus the total amount of emissions for the previous eleven calendar months).

The permittee currently maintains records capable of demonstrating compliance with this requirement.

#### **IV. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation and/or sulfur content limitation based upon the calculated sulfur dioxide emission rates from Section A.III.1. above. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any fuel burned in this emissions unit other than natural gas or Number 2 fuel oil. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
3. The permittee shall submit annual reports that specify the PE, PM10, SO<sub>2</sub>, NO<sub>x</sub>, CO

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and VOC emissions for this emissions unit for the previous calendar year. These reports shall

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be submitted by January 31 of each year. The CAA, Title V Fee Emission Report (FER) required to be submitted annually by April 15 for the facility will also satisfy the emission reporting requirement of this condition.

4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify all exceedances of the rolling 12-month total PE/PM10, SO2, NOx, VOC and CO emissions limitations.

If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

5. Unless otherwise specified, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
6. The permittee shall submit annual reports which identify the total amount of natural gas (in million cubic feet) and Number 2 fuel oil (in gallons) combusted in emissions units B005 and B006. These reports shall be submitted by January 31 of each year. The CAA, Title V Fee Emission Report (FER) required to be submitted annually by April 15 for the facility will also satisfy the emission reporting requirement of this condition.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

20% opacity, as a six-minute average

Applicable compliance method:

If required, compliance shall be determined in accordance with Test Method 9, as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, except as specified by rule.

- b. Emission Limitations:

**Altivity Packaging**  
**PTI Application: 14-04175**

**Facility ID: 1409010021**

Emissions Unit ID: B005

0.01 lb PE/PM10 per mmBtu of actual heat input (natural gas firing)  
0.02 lb PE/PM10 per mmBtu of actual heat input (number 2 fuel oil firing)  
12.6 TPY of PE/PM10 (combined emissions from B005-B006)

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Applicable compliance method:

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

For the use of number 2 fuel oil, the short term emissions limitation is based upon the emission unit's potential to emit and the manufacturer's guaranteed emissions data as provided in PTI application 14-04175 submitted on May 29, 1996.

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

The actual annual emission rate shall be calculated by using the actual fuel usages and emission factors and methodologies specified above. The annual emissions from emission units B005 and B006, combined, shall be summed over the rolling 12 month period to determine compliance with the annual emission limitation.

c. Emission Limitations:

0.001 lb SO<sub>2</sub>/mmBtu of actual heat input (natural gas firing)  
0.31 lb SO<sub>2</sub>/mmBtu of actual heat input (number 2 fuel oil firing)  
195.5 TPY SO<sub>2</sub> (combined emissions from B005-B006)

Applicable compliance method:

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

For the use of number 2 fuel oil, the short term emissions limitation is based upon the emission unit's potential to emit and the manufacturer's guaranteed emissions data as provided in PTI application 14-04175 submitted on May 29, 1996.

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

Emissions Unit ID: B005

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The actual annual emission rate shall be calculated by using the actual fuel usages and emission factors and methodologies specified above. The annual emissions from emission units B005 and B006, combined, shall be summed over the rolling 12 month period to determine compliance with the annual emission limitation

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d. Emission Limitations:

0.10 lb NO<sub>x</sub>/mmBtu of actual heat input (natural gas firing)  
0.18 lb NO<sub>x</sub>/mmBtu of actual heat input (number 2 fuel oil firing)  
113.5 TPY NO<sub>x</sub> (combined emissions from B005-B006)

Applicable compliance method:

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

For the use of number 2 fuel oil, the short term emissions limitation is based upon the emission unit's potential to emit and the manufacturer's guaranteed emissions data as provided in PTI application 14-04175 submitted on May 29, 1996.

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

The actual annual emission rate shall be calculated by using the actual fuel usages and emission factors and methodologies specified above. The annual emissions from emission units B005 and B006, combined, shall be summed over the rolling 12 month period to determine compliance with the annual emission limitation.

e. Emission Limitations:

0.16 lb CO/mmBtu of actual heat input (natural gas firing)  
0.16 lb CO/mmBtu of actual heat input (number 2 fuel oil firing)  
100.9 TPY CO (combined emissions from B005 - B006)

Applicable compliance method:

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

For the use of number 2 fuel oil, the short term emissions limitation is based upon the emission unit's potential to emit and the manufacturer's guaranteed

**Altivity Packaging**  
**PTI Application: 14-04175**

**Facility ID: 1409010021**

Emissions Unit ID: B005  
emissions data as provided in PTI application 14-04175 submitted on May 29, 1996.

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

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The actual annual emission rate shall be calculated by using the actual fuel usages and emission factors and methodologies specified above. The annual emissions from emission units B005 and B006, combined, shall be summed over the rolling 12 month period to determine compliance with the annual emission limitation.

f. Emission Limitations:

0.016 lb VOC/mmBtu of actual heat input (natural gas firing)  
0.025 lb VOC/mmBtu of actual heat input (number 2 fuel oil firing)  
15.8 TPY VOC (combined emissions from B005-B006)

Applicable compliance method:

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

For the use of number 2 fuel oil, the short term emissions limitation is based upon the emission unit's potential to emit and the manufacturer's guaranteed emissions data as provided in PTI application 14-04175 submitted on May 29, 1996.

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

The actual annual emission rate shall be calculated by using the actual fuel usages and emission factors and methodologies specified above. The annual emissions from emission units B005 and B006, combined, shall be summed over the rolling 12 month period to determine compliance with the annual emission limitation.

2. Compliance with the sulfur limitations in term and condition A.II.2. shall be demonstrated by the record keeping in term and condition A.III.1
3. Compliance with the fuel usage limitations in term and condition A.II.1. shall be demonstrated by the record keeping in term and condition A.III.2.
4. Compliance with the mass emissions limitations in terms and conditions A.I.2.b. shall be demonstrated by the record keeping in term and condition A.III.3.

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**VI. Miscellaneous Requirements**

1. The terms and conditions of this Permit To Install 14-04175 supersede the terms and conditions of Permit To Install 14-04175 as issued February 5, 1997.

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**B. State Only Enforceable Section**

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

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

**Operations, Property, and/or Equipment - (B005) - 72 mmBtu/hr natural gas or No. 2 oil fired boiler No. 1**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

Emissions Unit ID: B005

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

**A. State and Federally Enforceable Section**

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

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

**Operations, Property, and/or Equipment - (B006) - 72 mmBtu/hr natural gas or No. 2 oil fired boiler No. 2**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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OAC rule 3745-31-05(A)(3)	<p>When burning natural gas:</p> <p>Particulate Emissions (PE) and emissions of Particulate Matter less than 10 microns in diameter (PM10) shall not exceed 0.01 lb/mmBtu of actual heat input.</p> <p>Sulfur Dioxide (SO<sub>2</sub>) emissions shall not exceed 0.001 lb/mmBtu of actual heat input.</p> <p>Nitrogen Oxides (NO<sub>x</sub>) emissions shall not exceed 0.10 lb/mmBtu of actual heat input.</p> <p>Carbon Monoxide (CO) emissions shall not exceed 0.16 lb/mmBtu of actual heat input.</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 0.016 lb/mmBtu of actual heat input.</p> <p>When burning Number 2 fuel oil:</p> <p>Particulate Emissions (PE) and emissions of Particulate Matter less than 10 microns in diameter (PM10) shall not exceed 0.02 lb/mmBtu of actual heat input.</p> <p>Sulfur Dioxide (SO<sub>2</sub>) emissions shall not exceed 0.31 lb/mmBtu of actual heat input.</p> <p>Nitrogen Oxides (NO<sub>x</sub>) emissions shall not exceed 0.18 lb/mmBtu of actual heat input.</p> <p>Carbon Monoxide (CO) emissions shall not exceed 0.16 lb/mmBtu of actual heat input.</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 0.025 lb/mmBtu of actual heat input.</p> <p>See terms and conditions A.I.2.b, and A.II.1 through A.II.2.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-08(B), OAC rule 3745-23-06(B) and 40 CFR Part 60 Subpart Dc.</p>
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OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-17-10(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
OAC rule 3745-18-06	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
40 CFR Part 60 Subpart Dc	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except for one six-minute period per hour of not more than 27% opacity.
OAC rule 3745-21-08(B)	See term and condition A.I.2.c.
OAC rule 3745-23-06(B)	See term and condition A.I.2.d.

**2. Additional Terms and Conditions**

**2.a** The lb/mmBtu emission limitations outlined in term A.I.1, except for SO<sub>2</sub> emissions when firing fuel oil, are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these emission limitations.

**2.b** The maximum total annual emissions from emissions units B005 and B006, combined, shall not exceed the following rates based upon a rolling, 12-month summation:

113.5 TPY of nitrogen oxides (NO<sub>x</sub>).

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195.5 TPY of sulfur dioxide (SO<sub>2</sub>);  
100.9 TPY of carbon monoxide (CO).  
12.6 tons per year (TPY) of particulate emissions (PE) and PM<sub>10</sub>; and  
15.8 TPY of volatile organic compounds (VOC).

- 2.c** The permittee satisfies the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-08 by complying with the best available technology requirements of OAC rule 3745-31-05(A)(3).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.d** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

On February 15, 2005, OAC rule 3745-23-06 was rescinded and therefore no longer a part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-23-06, the requirement to satisfy "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.e** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

- 2.f** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the visible emissions limitation, the mass emission limitations and the use of natural gas and/or Number 2 fuel oil.

## II. Operational Restrictions

1. The permittee shall burn only natural gas and/or number 2 fuel oil in this emissions unit.
2. The quality of number 2 fuel oil received for burning in this emissions unit shall have a combination of sulfur content and heat content sufficient to comply with the allowable sulfur dioxide emission limitation of 0.31 lb/mmBtu of actual heat input and a sulfur content limit of less than or equal to 0.3 percent sulfur by weight.

## III. Monitoring and/or Recordkeeping Requirements

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

- a. Alternative 1:

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

- b. Alternative 2:

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

- c. 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.

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2. The permittee shall maintain monthly records of the following information for emissions units B005 and B006, combined:
  - a. the usage rates for each fuel (natural gas and Number 2 fuel oil) burned;

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- b. the rolling, 12-month summation of the natural gas and Number 2 fuel oil usage rates;
- c. the type and total amount of fuel, other than natural gas or Number 2 fuel oil, burned in this emissions unit.

The permittee currently maintains records capable of demonstrating compliance with this requirement.

- 3. The permittee shall maintain monthly records of the following information for emissions units B005 and B006, combined, in order to monitor compliance with the rolling, 12-month summation emissions limitations:
  - a. the total emissions, in tons, for PE/PM10, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC when burning any combination of fuels;
  - b. the rolling, 12-monthly summation emissions total, in tons, for PE/PM10, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC when burning any combination of fuels (the total amount of emissions calculated for the current month plus the total amount of emissions for the previous eleven calendar months).

The permittee currently maintains records capable of demonstrating compliance with this requirement.

#### **IV. Reporting Requirements**

- 1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation and/or sulfur content limitation based upon the calculated sulfur dioxide emission rates from Section A.III.1. above. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
- 2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any fuel burned in this emissions unit other than natural gas or Number 2 fuel oil. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
- 3. The permittee shall submit annual reports that specify the PE, PM10, SO<sub>2</sub>, NO<sub>x</sub>, CO and VOC emissions for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year. The CAA, Title V Fee Emission Report (FER) required to be submitted annually by April 15 for the facility will also satisfy the emission reporting requirement of this condition.
- 4. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton

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County Department of Environmental Services that identify all exceedances of the rolling 12-month total PE/PM10, SO2, NOx, VOC and CO emissions limitations.

If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

5. Unless otherwise specified, the deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
6. The permittee shall submit annual reports which identify the total amount of natural gas (in million cubic feet) and Number 2 fuel oil (in gallons) combusted in emissions units B005 and B006. These reports shall be submitted by January 31 of each year. The CAA, Title V Fee Emission Report (FER) required to be submitted annually by April 15 for the facility will also satisfy the emission reporting requirement of this condition.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:

20% opacity, as a six-minute average

Applicable compliance method:

If required, compliance shall be determined in accordance with Test Method 9, as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002, except as specified by rule.

- b. Emission Limitations:

0.01 lb PE/PM10 per mmBtu of actual heat input (natural gas firing)  
0.02 lb PE/PM10 per mmBtu of actual heat input (number 2 fuel oil firing)  
12.6 TPY of PE/PM10 (combined emissions from B005-B006)

Applicable compliance method:

**Altivity Packaging**  
**PTI Application: 14-04175**

**Facility ID: 1409010021**

Emissions Unit ID: B006

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

For the use of number 2 fuel oil, the short term emissions limitation is based upon the emission unit's potential to emit and the manufacturer's guaranteed emissions data as provided in PTI application 14-04175 submitted on May 29, 1996.

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

The actual annual emission rate shall be calculated by using the actual fuel usages and emission factors and methodologies specified above. The annual emissions from emission units B005 and B006, combined, shall be summed over the rolling 12 month period to determine compliance with the annual emission limitation.

c. Emission Limitations:

0.001 lb SO<sub>2</sub>/mmBtu of actual heat input (natural gas firing)  
0.31 lb SO<sub>2</sub>/mmBtu of actual heat input (number 2 fuel oil firing)  
195.5 TPY SO<sub>2</sub> (combined emissions from B005-B006)

Applicable compliance method:

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

For the use of number 2 fuel oil, the short term emissions limitation is based upon the emission unit's potential to emit and the manufacturer's guaranteed emissions data as provided in PTI application 14-04175 submitted on May 29, 1996.

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

The actual annual emission rate shall be calculated by using the actual fuel usages and emission factors and methodologies specified above. The annual emissions from emission units B005 and B006, combined, shall be summed over the rolling 12 month period to determine compliance with the annual emission limitation

d. Emission Limitations:

0.10 lb NO<sub>x</sub>/mmBtu of actual heat input (natural gas firing)  
0.18 lb NO<sub>x</sub>/mmBtu of actual heat input (number 2 fuel oil firing)

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113.5 TPY NO<sub>x</sub> (combined emissions from B005-B006)

Applicable compliance method:

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

For the use of number 2 fuel oil, the short term emissions limitation is based upon the emission unit's potential to emit and the manufacturer's guaranteed emissions data as provided in PTI application 14-04175 submitted on May 29, 1996.

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

The actual annual emission rate shall be calculated by using the actual fuel usages and emission factors and methodologies specified above. The annual emissions from emission units B005 and B006, combined, shall be summed over the rolling 12 month period to determine compliance with the annual emission limitation.

e. Emission Limitations:

0.16 lb CO/mmBtu of actual heat input (natural gas firing)

0.16 lb CO/mmBtu of actual heat input (number 2 fuel oil firing)

100.9 TPY CO (combined emissions from B005 - B006)

Applicable compliance method:

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

For the use of number 2 fuel oil, the short term emissions limitation is based upon the emission unit's potential to emit and the manufacturer's guaranteed emissions data as provided in PTI application 14-04175 submitted on May 29, 1996.

If required, the permittee shall demonstrate compliance with the lb/mmBtu

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emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 10.

The actual annual emission rate shall be calculated by using the actual fuel usages and emission factors and methodologies specified above. The annual emissions from emission units B005 and B006, combined, shall be summed over the rolling 12 month period to determine compliance with the annual emission limitation.

f. Emission Limitations:

0.016 lb VOC/mmBtu of actual heat input (natural gas firing)  
0.025 lb VOC/mmBtu of actual heat input (number 2 fuel oil firing)  
15.8 TPY VOC (combined emissions from B005-B006)

Applicable compliance method:

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

For the use of number 2 fuel oil, the short term emissions limitation is based upon the emission unit's potential to emit and the manufacturer's guaranteed emissions data as provided in PTI application 14-04175 submitted on May 29, 1996.

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

The actual annual emission rate shall be calculated by using the actual fuel usages and emission factors and methodologies specified above. The annual emissions from emission units B005 and B006, combined, shall be summed over the rolling 12 month period to determine compliance with the annual emission limitation.

2. Compliance with the sulfur limitations in term and condition A.II.2. shall be demonstrated by the record keeping in term and condition A.III.1
3. Compliance with the fuel usage limitations in term and condition A.II.1. shall be demonstrated by the record keeping in term and condition A.III.2.
4. Compliance with the mass emissions limitations in terms and conditions A.I.2.b. shall be demonstrated by the record keeping in term and condition A.III.3.

**VI. Miscellaneous Requirements**

Emissions Unit ID: B006

**Issued: To be entered upon final issuance**

1. The terms and conditions of this Permit To Install 14-04175 supersede the terms and conditions of Permit To Install 14-04175 as issued February 5, 1997.

**Issued: To be entered upon final issuance**

**B. State Only Enforceable Section**

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

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

**Operations, Property, and/or Equipment - (B006) - 72 mmBtu/hr natural gas or No. 2 oil fired boiler No. 2**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

2. **Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None