

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install: **14-05967**

A. 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 expires in 7/2008. 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.

This permit to install (PTI) is for a Plant Expansion Project that involves 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 are being modified in this permitting action to avoid subjecting the Plant Expansion Project to major modification new source review.

B. 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, and attainment for all other criteria pollutants. PM2.5 non-attainment rules for implementation are still under development and have not been finalized at this time. Pursuant to USEPA interim guidance regarding regulation of PM2.5 emissions, PM10 is considered a surrogate for PM2.5 for the purposes of this permit to install action, 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 has requested that this permit 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).

C. Source Emissions

The following table summarizes net emission increases and decreases due to the proposed Plant Expansion Project and the major NSR threshold levels for each pollutant:

	PE	PM10	SO2	NOx	VOC	CO
Baseline Actual Emissions (TPY)	30.13	26.11	916.05	749.82	75.29	26.81
Future Potential Emissions (TPY)	39.13	40.64	896.78	585.60	114.90	35.07

Net Project Increases/(Decreases) (TPY)	9.00	14.53	(19.27)	(164.22)	39.61	8.26
Major NSR Threshold	25	15	40	40	40	100

Nine (9) emissions units are included in this permit and have been subjected to new and/or modified federally enforceable limitations/restrictions in order to avoid major NSR. Of the nine emissions units, one is a new source identified as the broke system (P107), which will be a new source of VOC emissions. Existing emission units for paper making (P101 and P102) will be 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 this permitting action, existing paper making emissions units (P101 and P102) have been 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) have been 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) has been carried forward into this permit. Lastly, the four (4) existing coal-fired boilers (B001-B004), previously not subject to any annual emission limitations or BAT, will be 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 will ensure that the Plant Expansion Project avoids major modification non-attainment NSR and PSD.

D. Conclusion

The permittee has 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, the permittee has 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 will not trigger non-attainment NSR and PSD for any of the criteria pollutants. This permit also contains 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 continues to avoid triggering PSD. The facility will maintain records and be subject to reporting as outlined in the permit to ensure compliance with the voluntary netting and Synthetic Minor limitations.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
BUTLER COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

Application No: 14-05967

Fac ID: 1409010043

DATE: 10/4/2007

Wausau Paper Towel and Tissue LLC
Denise Curry
700 Columbia Ave
Middletown, OH 45042-1931

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 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 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, 43216-1049.

A Permit to Install 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 a fee of **\$7200** 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 Regional Council of Gov.

KY

IN

BUTLER COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **14-05967** FOR AN AIR CONTAMINANT SOURCE
FOR **Wausau Paper Towel and Tissue LLC**

On 10/4/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Wausau Paper Towel and Tissue LLC**, located at **700 Columbia Ave, Middletown, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05967:

Plant Expansion Project - Modification to Paper Machines and New Broke System.

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 Howart 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 PERMIT TO INSTALL 14-05967

Application Number: 14-05967
Facility ID: 1409010043
Permit Fee: **To be entered upon final issuance**
Name of Facility: Wausau Paper Towel and Tissue LLC
Person to Contact: Denise Curry
Address: 700 Columbia Ave
Middletown, OH 45042-1931

Location of proposed air contaminant source(s) [emissions unit(s)]:

**700 Columbia Ave
Middletown, Ohio**

Description of proposed emissions unit(s):

Plant Expansion Project - Modification to Paper Machines and New Broke System.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Chris Korleski
Director

Wausau Paper Towel and Tissue LLC
PTI Application: 14-05967
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 1409010043

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

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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 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,

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

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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.

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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.
 - 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

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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

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.

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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.

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

1. Compliance Requirements

The emissions unit(s) identified in this Permit 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

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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.

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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.

Wausau Paper Towel and Tissue LLC**Facility ID: 1409010043****PTI Application: 14-05967****Issued: To be entered upon final issuance****C. Permit-To-Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	39.13
PM10	40.64
SO2	896.78
NOx	585.60
CO	114.90
VOC	35.07

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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 permit to install (PTI) shall cover the Plant Expansion Project at the Wausau Paper Towel and Tissue LLC facility which involves the installation of a new broke (recycling) system (P107), a modification to drying hoods and an existing paper machine line (P101), and modifications to allowable emissions on existing emission units including existing paper machine lines (P101, P102), existing de-inking operations (P103, P104), and existing coal-fired boilers (B001-B004).

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 volatile organic compounds (VOC) and particulate matter less than 2.5 microns (PM2.5) emissions and netting out of Prevention of Significant Deterioration (PSD) and corresponding OAC regulations for nitrogen oxides (NOx), sulfur dioxide (SO2), and particulate matter less than 10 microns (PM10) emissions. PM10 emissions were used as a surrogate for PM2.5 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.

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 a consecutive 24-month period within 10 years of the permit application for the Plant Expansion Project, submitted July 27, 2007. Wausau Paper Towel and Tissue LLC used the 24-month period of 4/1998 - 3/2000 as the baseline for emission calculations of the following pollutants: total particulate emissions (PE), PM10, SO2, NOx, and carbon monoxide (CO). Wausau Paper Towel and Tissue LLC used the 24-month period of 8/2004 - 7/2006 as the baseline for emission calculations of VOC.

The following tables summarize the netting project and includes all emissions units at the Wausau Paper Towel and Tissue LLC facility that are being used to demonstrate a significant emissions increase and a significant net emission increase of PE, PM10/PM2.5, SO2, NOx, VOC, and CO does not occur as a result of the Plant Expansion Project:

Table I. Sum of the baseline actual emissions by pollutant for each existing emissions unit in accordance with OAC rule 3745-31-01(O)

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Existing Sources		PE (TPY)	PM10 (TPY)	SO2 (TPY)	NOx (TPY)	VOC (TPY)	CO (TPY)
P101	Paper Machine No. 1, drying hoods	0.23	0.90	0.07	11.86	0.78	9.93
P102	Paper Machine No. 2, drying hoods						
P101	Paper Machine No. 1, off-line wire/felt cleaning					19.91	
P102	Paper Machine No. 2, off-line wire/felt cleaning						
P101	Paper Machine No. 1, paper making only					51.03	
P102	Paper Machine No. 2, paper making only						
P103	Natural De-Inking					2.41	
P104	Bleach De-Inking						
B001	Boiler No. 1	29.86	25.19	915.98	737.96	1.16	16.88
B002	Boiler No. 2						
B003	Boiler No. 3						
B004	Boiler No. 4						
NA	Material storage tanks					0.0	
F002/F003	Ash Handling/Coal Handling and Storage Piles	0.04	0.02				
Total Baseline Actual Emissions (TPY)		30.13	26.11	916.05	749.82	75.29	26.81

Table II. Sum of the future potential to emit (permit allowable) by pollutant for each existing and new emissions unit in accordance with OAC rule 3745-31-01(III) - Post issuance of PTI 14-05736

Existing Sources		PE (TPY)	PM10 (TPY)	SO2 (TPY)	NOx (TPY)	VOC (TPY)	CO (TPY)
P101	Paper Machine No. 1, drying hoods	1.07	2.59	0.09	39.9	0.83	12.62
P102	Paper Machine No. 2, drying hoods			0.07		0.64	9.82
P101	Paper Machine No. 1, off-line wire/felt cleaning					39.0	
P102	Paper Machine No. 2, off-line wire/felt cleaning						
P101	Paper Machine No. 1, paper making only					68.07	
P102	Paper Machine No. 2, paper making only						
P103	Natural De-Inking					4.67*	
P104	Bleach De-Inking						
B001	Boiler No. 1	38.02	38.03	896.62	545.70	1.50	12.63
B002	Boiler No. 2						
B003	Boiler No. 3						
B004	Boiler No. 4						
NA	Material storage tanks					0.19	
F002/F003	Ash Handling/Coal Handling and Storage Piles	0.04	0.02				

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New Sources							
P107	Broke System (*P103, P104, and P107 combined emissions)					*see above	
Total Future Potential Emissions/Allowable Limits (TPY)		39.13	40.64	896.78	585.60	114.90	35.07

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

	PE (TPY)	PM10 (TPY)	SO2 (TPY)	NOx (TPY)	VOC (TPY)	CO (TPY)
Total Baseline Actual Emissions (TPY)	30.13	26.11	916.05	749.82	75.29	26.81
Total Projected Future Emissions/Allowable Limits (TPY)	39.13	40.64	896.78	585.60	114.90	35.07
Total Project - Change in Emissions (TPY)	9.00	14.53	(19.27)	(164.22)	39.61	8.26
Contemporaneous creditable increases/decreases (TPY)	0	0	0	0	0	0
Total Project - Net Emissions Increase/Decrease (TPY)	9.00	14.53	(19.27)*	(164.22)	39.61	8.26
PSD/NNSR Significant Emissions Level (TPY)	25	15	40	40	40	100

* This number represents an emissions decrease.

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 - (B001) - Boiler No. 1 - 95 mmBtu/hour coal/No. 2 fuel oil-fired boiler with cyclone and scrubber - Modification

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Voluntary Restriction to Avoid Non-Attainment New Source Review and Prevention of Significant Deterioration	See terms and conditions A.I.2.a, A.I.2.b, A.I.2.c, A.II.2, and A.II.3.
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.
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.
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(C).
OAC rule 3745-18-15(F)	Sulfur dioxide (SO ₂) emissions shall not exceed 1.4 pounds per mmBtu of actual heat input. See term and condition A.I.2.d.

2. Additional Terms and Conditions

- 2.a This emissions unit shall not exceed the following 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 Section A.II.3:

- i. 0.06 pound of PE/PM₁₀ per mmBtu of actual heat input.

- 2.b The maximum total annual emissions from emissions units B001, B002, B003,

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and B004, combined, shall not exceed the following emission limitations based upon a rolling, 12-month summation:

38.02 tons per year (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.

- 2.c** The permittee shall operate the cyclone and venturi scrubber at all times when this emissions unit is in operation.
- 2.d** This emissions unit shall be vented to a stack no lower than two hundred feet above ground level.
- 2.e** Compliance with OAC rule 3745-31-05(C) shall be demonstrated by the emission limitations, the use of cyclone and scrubber control equipment, and annual fuel usage restrictions.

II. 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 Section A.I.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.

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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.

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

Each monthly representative sample of coal shall be analyzed for sulfur content (percent), ash content (percent), and heat content (Btu/pound of coal). The analytical methods to be used to determine the ash content, sulfur content, and heat content shall be the most recent version of: ASTM method D3174, 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-

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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);

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

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IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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.

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5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. an identification of all exceedances of the rolling, 12-month coal usage limitation for emissions unit B001, B002, B003, and B004, combined, as specified in Section A.II.3;
 - b. an identification of all exceedances of the rolling, 12-month No. 2 fuel oil usage limitation for emissions unit B001, B002, B003, and B004, combined, as specified in Section A.II.2; and
 - c. an identification of all exceedances of the rolling, 12-month emission limitations for PE, PM10, SO2, NOx, VOC, and CO for emissions unit B001, B002, B003, and B004, combined, as specified in Section A.I.2.b.
6. The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit unless otherwise specified.
7. The permittee shall submit annual reports which specify the total PE, PM10, SO2, NOx, VOC, and CO emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Sections A.I.1 and A.I.2 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 1000gallons/hr) and dividing by the emissions unit's rated heat input

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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 (9/98).

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.

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Applicable Compliance Method:

The permittee shall demonstrate compliance with the above SO₂ emission limitation based on the monitoring and record keeping requirements in Section A.III.2, A.III.3, and A.III.4 and the reporting requirements in Section A.IV.2 and A.IV.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

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above shall be determined by the record keeping requirements specified in Section A.III.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 and 1.3 (9/98). Compliance with the PE and PM10 emission limitation specified above shall be determined by the record keeping requirements specified in Section A.III.6 and emission testing required in Section A.V.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 this permit to install; unless otherwise approved by Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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 emissions rate through the appropriate PM10 emission factors based on USEPA AP-42 guidance documents.

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- iv. During the test, the pressure drop and water flow rate of the venturi scrubber 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 Hamilton County Department of Environmental Services.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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, and the person(s) who will be conducting the test. 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.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test, 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.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services.

2. Compliance with the rolling 12-month No. 2 fuel oil usage restriction specified in Section A.II.2 shall be determined by the record keeping requirements specified in Section A.III.6.
3. Compliance with the rolling 12-month coal usage restriction specified in Section A.II.3 shall be determined by the record keeping requirements specified in Section A.III.6.

VI. Miscellaneous Requirements

1. 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 this permit to install, pursuant to this USEPA guidance, PM₁₀ was considered a surrogate

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for PM2.5. Since the PM10 emissions are less than the major modification threshold, the non-attainment new source review requirements do not apply for PM10 and PM2.5.

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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 - (B001) - Boiler No. 1 - 95 mmBtu/hour coal/No. 2 fuel oil-fired boiler with cyclone and scrubber - Modification

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

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 -(B002) - Boiler No. 2 - 95 mmBtu/hour coal/No. 2 fuel oil-fired boiler with cyclone and scrubber - Modification

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Voluntary Restriction to Avoid Non-Attainment New Source Review and Prevention of Significant Deterioration	See terms and conditions A.I.2.a, A.I.2.b, A.I.2.c, A.II.2, and A.II.3.
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.
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.
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(C).
OAC rule 3745-18-15(F)	Sulfur dioxide (SO ₂) emissions shall not exceed 1.4 pounds per mmBtu of actual heat input. See term and condition A.I.2.d.

2. Additional Terms and Conditions

- 2.a This emissions unit shall not exceed the following 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 Section A.II.3:
 - i. 0.06 pound of PE/PM₁₀ per mmBtu of actual heat input.

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- 2.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:
- 38.02 tons per year (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.
- 2.c** The permittee shall operate the cyclone and venturi scrubber at all times when this emissions unit is in operation.
- 2.d** This emissions unit shall be vented to a stack no lower than two hundred feet above ground level.
- 2.e** Compliance with OAC rule 3745-31-05(C) shall be demonstrated by the emission limitations, the use of cyclone and scrubber control equipment, and annual fuel usage restrictions.

II. 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 Section A.I.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

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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.

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

Each monthly representative sample of coal shall be analyzed for sulfur content (percent), ash content (percent), and heat content (Btu/pound of coal). The analytical methods to be used to determine the ash content, sulfur content, and heat content shall be the most recent version of: ASTM method D3174, 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.

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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;

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

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services and shall cover the oil shipments received during the previous calendar quarter.

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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 which identify all exceedances of the following:
 - a. an identification of all exceedances of the rolling, 12-month coal usage limitation for emissions unit B001, B002, B003, and B004, combined, as specified in Section A.II.3;
 - b. an identification of all exceedances of the rolling, 12-month No. 2 fuel oil usage limitation for emissions unit B001, B002, B003, and B004, combined, as specified in Section A.II.2; and
 - c. an identification of all exceedances of the rolling, 12-month emission limitations for PE, PM10, SO2, NOx, VOC, and CO for emissions unit B001, B002, B003, and B004, combined, as specified in Section A.I.2.b.
6. The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit unless otherwise specified.
7. The permittee shall submit annual reports which specify the total PE, PM10, SO2, NOx, VOC, and CO emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Sections A.I.1 and A.I.2 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

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fuel oil.

Applicable Compliance Method:

Compliance may be determined by multiplying an emission factor of 2.0 lbs of particulate/1000 gallons of oil fired by the emissions unit's maximum hourly fuel oil firing capacity (in 1000gallons/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 (9/98).

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 Section A.III.2, A.III.3, and A.III.4 and the reporting requirements in Section A.IV.2 and A.IV.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).

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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 Section A.III.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 and 1.3 (9/98). Compliance with the PE and PM10 emission limitation specified above shall be determined by the record keeping requirements specified in Section A.III.6 and emission testing required in Section A.V.1.e of this permit.

e. Emissions Limitation:

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

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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 this permit to install; unless otherwise approved by Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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 emissions rate through the appropriate PM10 emission factors based on USEPA AP-42 guidance documents.

- iv. During the test, the pressure drop and water flow rate of the venturi scrubber 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 Hamilton County Department of Environmental Services.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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, and the person(s) who will be

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conducting the test. 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.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test, 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.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services.

2. Compliance with the rolling 12-month No. 2 fuel oil usage restriction specified in Section A.II.2 shall be determined by the record keeping requirements specified in Section A.III.6.
3. Compliance with the rolling 12-month coal usage restriction specified in Section A.II.3 shall be determined by the record keeping requirements specified in Section A.III.6.

VI. Miscellaneous Requirements

1. 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 this 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}.

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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 - (B002) - Boiler No. 2 - 95 mmBtu/hour coal/No. 2 fuel oil-fired boiler with cyclone and scrubber - Modification

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

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 -(B003) - Boiler No. 3 - 95 mmBtu/hour coal/No. 2 fuel oil-fired boiler with cyclone and scrubber - Modification

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Voluntary Restriction to Avoid Non-Attainment New Source Review and Prevention of Significant Deterioration	See terms and conditions A.I.2.a, A.I.2.b, A.I.2.c, A.II.2, and A.II.3.
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.
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.
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(C).
OAC rule 3745-18-15(F)	Sulfur dioxide (SO ₂) emissions shall not exceed 1.4 pounds per mmBtu of actual heat input. See term and condition A.I.2.d.

2. Additional Terms and Conditions

- 2.a This emissions unit shall not exceed the following 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 Section A.II.3:
 - i. 0.06 pound of PE/PM₁₀ per mmBtu of actual heat input.

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- 2.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:
- 38.02 tons per year (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.
- 2.c** The permittee shall operate the cyclone and venturi scrubber at all times when this emissions unit is in operation.
- 2.d** This emissions unit shall be vented to a stack no lower than two hundred feet above ground level.
- 2.e** Compliance with OAC rule 3745-31-05(C) shall be demonstrated by the emission limitations, the use of cyclone and scrubber control equipment, and annual fuel usage restrictions.

II. 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 Section A.I.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

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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.

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

Each monthly representative sample of coal shall be analyzed for sulfur content (percent), ash content (percent), and heat content (Btu/pound of coal). The analytical methods to be used to determine the ash content, sulfur content, and heat content shall be the most recent version of: ASTM method D3174, 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

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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);

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- c. the total amount of No.2 fuel oil used, in gallons per month;
- d. the updated rolling, 12-month summation of fuel oil usage, in gallons (the total amount of gallons for the current month plus the total amount of gallons for the previous eleven calendar months);
- e. the total emissions, in tons, for PE, PM10, SO2, NOx, VOC, and CO for each month; and
- f. the updated rolling, 12-month summation emissions total, in tons, for PE, PM10, SO2, NOx, VOC, and CO (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).

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IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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.

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5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. an identification of all exceedances of the rolling, 12-month coal usage limitation for emissions unit B001, B002, B003, and B004, combined, as specified in Section A.II.3;
 - b. an identification of all exceedances of the rolling, 12-month No. 2 fuel oil usage limitation for emissions unit B001, B002, B003, and B004, combined, as specified in Section A.II.2; and
 - c. an identification of all exceedances of the rolling, 12-month emission limitations for PE, PM10, SO2, NOx, VOC, and CO for emissions unit B001, B002, B003, and B004, combined, as specified in Section A.I.2.b.
6. The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit unless otherwise specified.
7. The permittee shall submit annual reports which specify the total PE, PM10, SO2, NOx, VOC, and CO emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Sections A.I.1 and A.I.2 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 particulate/1000 gallons of oil fired by the emissions unit's maximum hourly fuel oil firing capacity (in 1000gallons/hr) and dividing by the emissions unit's rated

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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 (9/98).

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.

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Applicable Compliance Method:

The permittee shall demonstrate compliance with the above SO₂ emission limitation based on the monitoring and record keeping requirements in Section A.III.2, A.III.3, and A.III.4 and the reporting requirements in Section A.IV.2 and A.IV.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

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above shall be determined by the record keeping requirements specified in Section A.III.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 and 1.3 (9/98). Compliance with the PE and PM10 emission limitation specified above shall be determined by the record keeping requirements specified in Section A.III.6 and emission testing required in Section A.V.1.e of this permit.

e. Emissions Limitation:

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

Applicable Compliance Method:

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

- i. The emission testing shall be conducted within 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 this permit to install; unless otherwise approved by Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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 emissions rate through the appropriate PM10 emission factors based on USEPA AP-42 guidance documents.

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- iv. During the test, the pressure drop and water flow rate of the venturi scrubber 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 Hamilton County Department of Environmental Services.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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, and the person(s) who will be conducting the test. 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.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test, 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.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services.

2. Compliance with the rolling 12-month No. 2 fuel oil usage restriction specified in Section A.II.2 shall be determined by the record keeping requirements specified in Section A.III.6.
3. Compliance with the rolling 12-month coal usage restriction specified in Section A.II.3 shall be determined by the record keeping requirements specified in Section A.III.6.

VI. Miscellaneous Requirements

1. 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 this permit to install, pursuant to this USEPA guidance, PM₁₀ was considered a surrogate

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for PM2.5. Since the PM10 emissions are less than the major modification threshold, the non-attainment new source review requirements do not apply for PM10 and PM2.5.

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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 -(B003) - Boiler No. 3 - 95 mmBtu/hour coal/No. 2 fuel oil-fired boiler with cyclone and scrubber - Modification

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

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 - (B004) - Boiler No. 4 - 174 mmBtu/hour coal/No. 2 fuel oil-fired boiler with cyclone and scrubber - Modification

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(C) Voluntary Restriction to Avoid Non-Attainment New Source Review and Prevention of Significant Deterioration	See terms and conditions A.I.2.a, A.I.2.b, A.I.2.c, A.II.2, and A.II.3.
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.
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.
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(C).
OAC rule 3745-18-15(F)	Sulfur dioxide (SO ₂) emissions shall not exceed 1.4 pounds per mmBtu of actual heat input. See term and condition A.I.2.d.

2. Additional Terms and Conditions

- 2.a This emissions unit shall not exceed the following 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 Section A.II.3:
 - i. 0.06 pound of PE/PM₁₀ per mmBtu of actual heat input.

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- 2.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:
- 38.02 tons per year (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.
- 2.c** The permittee shall operate the cyclone and venturi scrubber at all times when this emissions unit is in operation.
- 2.d** This emissions unit shall be vented to a stack no lower than two hundred feet above ground level.
- 2.e** Compliance with OAC rule 3745-31-05(C) shall be demonstrated by the emission limitations, the use of cyclone and scrubber control equipment, and annual fuel usage restrictions.

II. 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 Section A.I.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

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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.

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

Each monthly representative sample of coal shall be analyzed for sulfur content (percent), ash content (percent), and heat content (Btu/pound of coal). The analytical methods to be used to determine the ash content, sulfur content, and heat content shall be the most recent version of: ASTM method D3174, 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

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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);

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- c. the total amount of No.2 fuel oil used, in gallons per month;
- d. the updated rolling, 12-month summation of fuel oil usage, in gallons (the total amount of gallons for the current month plus the total amount of gallons for the previous eleven calendar months);
- e. the total emissions, in tons, for PE, PM10, SO2, NOx, VOC, and CO for each month; and
- f. the updated rolling, 12-month summation emissions total, in tons, for PE, PM10, SO2, NOx, VOC, and CO (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).

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IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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.

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5. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. an identification of all exceedances of the rolling, 12-month coal usage limitation for emissions unit B001, B002, B003, and B004, combined, as specified in Section A.II.3;
 - b. an identification of all exceedances of the rolling, 12-month No. 2 fuel oil usage limitation for emissions unit B001, B002, B003, and B004, combined, as specified in Section A.II.2; and
 - c. an identification of all exceedances of the rolling, 12-month emission limitations for PE, PM10, SO2, NOx, VOC, and CO for emissions unit B001, B002, B003, and B004, combined, as specified in Section A.I.2.b.
6. The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit unless otherwise specified.
7. The permittee shall submit annual reports which specify the total PE, PM10, SO2, NOx, VOC, and CO emissions from this emissions unit for the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

V. Testing Requirements

1. Compliance with the emission limitations in Sections A.I.1 and A.I.2 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 particulate/1000 gallons of oil fired by the emissions unit's maximum hourly fuel oil firing capacity (in 1000gallons/hr) and dividing by the emissions unit's rated

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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 (9/98).

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.

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Applicable Compliance Method:

The permittee shall demonstrate compliance with the above SO₂ emission limitation based on the monitoring and record keeping requirements in Section A.III.2, A.III.3, and A.III.4 and the reporting requirements in Section A.IV.2 and A.IV.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

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above shall be determined by the record keeping requirements specified in Section A.III.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 and 1.3 (9/98). Compliance with the PE and PM10 emission limitation specified above shall be determined by the record keeping requirements specified in Section A.III.6 and emission testing required in Section A.V.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 this permit to install; unless otherwise approved by Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services 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 emissions rate through the appropriate PM10 emission factors based on USEPA AP-42 guidance documents.

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- iv. During the test, the pressure drop and water flow rate of the venturi scrubber 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 Hamilton County Department of Environmental Services.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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, and the person(s) who will be conducting the test. 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.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test, 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.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services.

2. Compliance with the rolling 12-month No. 2 fuel oil usage restriction specified in Section A.II.2 shall be determined by the record keeping requirements specified in Section A.III.6.
3. Compliance with the rolling 12-month coal usage restriction specified in Section A.II.3 shall be determined by the record keeping requirements specified in Section A.III.6.

VI. Miscellaneous Requirements

1. 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 this permit to install, pursuant to this USEPA guidance, PM₁₀ was considered a surrogate

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for PM2.5. Since the PM10 emissions are less than the major modification threshold, the non-attainment new source review requirements do not apply for PM10 and PM2.5.

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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 - (B004) - Boiler No. 4 - 174 mmBtu/hour coal/No. 2 fuel oil-fired boiler with cyclone and scrubber - Modification

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

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 -(P101) - Paper Machine No. 1, including 35 mmBtu/hour natural gas/LPG-fired drying hoods and off-line wire and felt cleaning - Modification

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 15.24 pounds per hour*, excluding off-line wire & felt cleaning and drying hoods.</p> <p>The drying hoods on this emissions unit shall not exceed the following emission limitations:</p> <p>When burning natural gas, 2.88 pounds of carbon monoxide (CO) per hour*, 3.43 pounds of nitrogen oxides (NOx) per hour*, and 0.19 pound of VOC per hour*.</p> <p>When burning LPG (propane), 1.22 pounds of CO per hour*, 7.27 pounds of nitrogen oxides (NOx) per hour*, and 0.11 pound of VOC per hour*.</p> <p>When burning any combination of natural gas or LPG, 12.62 tons per year (TPY) of CO emissions*.</p> <p>*The hourly and annual emission limitations outlined above are based on the emission unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with these limitations.</p> <p>See term and condition A.I.2.a.i.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G) and OAC rule 3745-31-05(C).</p>

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OAC rule 3745-31-05(C) Voluntary Restriction to Avoid Non-Attainment New Source Review and Prevention of Significant Deterioration	See terms and conditions A.I.2.a.ii, A.I.2.b, A.I.2.c, A.II.3, and A.II.4.
OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack associated with this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
OAC rule 3745-21-07(G)	Exempt. See term and condition A.II.1.
OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO ₂) emissions shall not exceed 194.7 pounds per hour.
ORC rule 3704.03(T)(4)	See terms and conditions A.I.2.d.

2. Additional Terms and Conditions

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

- i. 325 pounds VOC per hour*; and
- ii. 39 TPY VOC, based upon a rolling, 12-month summation.

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

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

68.07 TPY VOC.

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

1.07 TPY of PE;

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2.59 TPY of particulate matter 10 microns and less in diameter (PM10);
39.9 TPY of NO_x; and
1.47 TPY of VOC.

- 2.d** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO₂, PE and PM10 emissions associated with this air contaminant source since the uncontrolled potential to emit for SO₂, PE and PM10 is less than 10 TPY.
- 2.e** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations, the use of natural gas and/or propane, and the use of non-photochemically reactive materials.

II. Operational Restrictions

1. This emissions unit currently does not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).
2. The permittee shall burn only natural gas or LPG (propane) in this emissions unit.
3. The maximum annual VOC input, as applied, of liquid organic materials employed by the off-line wire and felt cleaning operations in emissions units P101 and P102, combined, shall not exceed 39 tons per year as a rolling 12-month summation. The VOC input shall be determined by multiplying the gallons of liquid organic materials employed per month by the VOC content of each liquid organic material (see record keeping requirements in term A.III.3).

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

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

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

III. Monitoring and/or Recordkeeping Requirements

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

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the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

2. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.
3. The permittee shall collect and record the following information each month for emissions units P101 and P102, combined, from the off-line wire and felt cleaning operations:

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- a. the name and identification of each solvent employed;
 - b. the VOC content of each solvent employed, in pounds per gallon;
 - c. the number of gallons of each solvent employed;
 - d. the monthly VOC input (the summation of the results of the value from line b. multiplied by the value from line c. for each liquid organic material employed);
 - e. the updated rolling, 12-month summation total, in tons, of VOC input (the total amount of VOC input for the current month recorded in line c. plus the total amount of VOC input for the previous eleven calendar months); and
 - f. the updated rolling, 12-month summation total, in tons, of VOC emissions (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months), assuming 100 percent of VOC input value from line e. is emitted to the air.
4. The permittee shall collect and record the following information each month for emissions units P101 and P102, combined, excluding off-line wire and felt cleaning and the drying hoods:
- a. the total amount of machine dried tons of paper (MDTP), in tons per month;
 - b. the updated rolling, 12-month summation of MDTP, in tons (the total amount of tons for the current month plus the total amount of tons for the previous eleven calendar months);
 - c. the total emissions, in tons, of VOC calculated by the following equation:
$$E = [(MDTP/month \text{ for emissions unit P101} \times 0.9352 \text{ lb of VOC/MDTP}^*) + (MDTP/month \text{ for emissions unit P102} \times 0.9292 \text{ lb of VOC/MDTP}^*)]/2000,$$
where E = Emission Rate (tons per month).

*as provided in the supporting emission test data contained in the PTI application 14-05967, submitted July 27, 2007, or the emission factors established during the most recent emission test for these emissions units.
 - d. the updated rolling, 12-month summation emissions total, in tons, of VOC (the total amount of emissions for the current month plus the total amount of

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emissions for the previous eleven calendar months).

5. The permittee shall collect and record the following information each month for emissions units P101 and P102:
 - a. the combined amount of LPG used in the drying hoods associated with emissions units P101 and P102, in gallons per month;
 - b. the combined amount of natural gas used in the drying hoods associated with emissions units P101 and P102, in cubic feet per month;
 - c. the monthly combined PE, PM10, NO_x, and VOC emissions from the drying hoods associated with emissions units P101 and P102; and
 - d. the updated, rolling, 12-month summation of PE, PM10, VOC and NO_x emissions from the drying hoods associated with emissions units P101 and P102 combined (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance 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 LPG (propane). The notification shall include a copy of such record and shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the deviation occurs.
3. The permittee shall submit annual reports that specify the total VOC and NO_x emissions from this emissions unit for the calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit the annual Fee Emission Report.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. an identification of all exceedances of the rolling, 12-month VOC input operational restriction for the off-line wire and felt cleaning operations on

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emissions units P101 and P102, combined, as specified in Section A.II.3;

- b. an identification of all exceedances of the rolling, 12-month emissions limitation for VOC from the off-line wire and felt cleaning operations on emissions units P101 and P102, combined, as specified in Section A.I.2.a.ii;
 - c. an identification of all exceedances of the rolling, 12-month MDTP operational restriction for emissions units P101 and P102, combined, as specified in Section A.II.4;
 - d. an identification of all exceedances of the rolling, 12-month emissions limitation for VOC for emissions units P101 and P102, combined, (excluding drying hoods and off-line wire/felt cleaning operations), as specified in Section A.I.2.b; and
 - e. an identification of all exceedances of the rolling, 12-month emission limitations for PE, PM10, VOC, and NOx from the drying hoods on emissions units P101 and P102, combined, when burning any combination of natural gas or LPG, as specified in Section A.I.2.c.
5. The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit unless otherwise specified.

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 methods:

a. Emission Limitation:

VOC emissions shall not exceed 15.24 pounds per hour, excluding off-line wire & felt cleaning and drying hoods.

Applicable Compliance Method:

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

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E = the maximum machine dried tons paper (MDTP) capacity of 16.3 tons/hour x 0.9352 lb of VOC/MDTP per permittee-supplied 1997 emissions test data from paper making operations;

where E = Emission Rate (pounds per hour).

b. Emission Limitations:

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

2.88 lbs of CO/hour when burning natural gas;
 3.43 lbs of NO_x/hour when burning natural gas;
 0.19 lb of VOC/hour when burning natural gas;
 1.22 lbs of CO/hour when burning LPG;
 7.27 lbs of NO_x/hour when burning LPG; and
 0.11 lb of VOC/hour when burning LPG.

Applicable Compliance Method:

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

For natural gas combustion:

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

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

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

For LPG (propane) combustion:

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

E_{NO_x} = heat input capacity of 35 mmBtu/hour x 0.2076 lb of NO_x/mmBtu per AP-42 Table 1.5-1 for LPG combustion;

E_{VOC} = heat input capacity of 35 mmBtu/hour x 0.00328 lb of VOC/mmBtu per

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AP-42 Table 1.5-1 for LPG combustion

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

c. Emission Limitation:

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

Applicable Compliance Method:

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

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For natural gas combustion:

$E = \text{heat input capacity of } 35 \text{ mmBtu/hour} \times 0.0823 \text{ lb of CO/mmBtu per AP-42 Table 1.4-1 for natural gas combustion} \times 8760 \text{ hours}/(2000)]; \text{ and}$

For LPG (propane) combustion:

$E = \text{heat input capacity of } 35 \text{ mmBtu/hour} \times 0.0349 \text{ lb of CO/mmBtu per AP-42 Table 1.5-1 for LPG combustion} \times 8760 \text{ hours}/(2000)];$

where E = Emission Rate (tons per year).

d. Emission Limitation:

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

Applicable Compliance Method:

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

e. Emission Limitations:

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

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

Applicable Compliance Method:

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

$E = \text{maximum solvent usage rate of } 50 \text{ gallons per hour} \times 6.5 \text{ lbs of VOC per gallon of solvent};$

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where E = Emission Rate (pounds per hour).

Compliance with the annual VOC emissions limitation shall be determined by compliance with the VOC input restriction specified in Section A.II.3 and the record keeping requirements specified in Section A.III.3.

f. Emission Limitation:

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

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by compliance with the MDTP operational restriction specified in Section A.II.4, record keeping requirements specified in Section A.III.4, and the emission testing as specified in Section A.V.2.

g. Emission Limitations:

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

1.07 TPY of PE;
2.59 TPY of PM10;
39.9 TPY of NOx; and
1.47 TPY of VOC.

Applicable Compliance Method:

Compliance with the PE, PM10, VOC, and NOx emission limitations specified above shall be determined by the record keeping requirements specified in Section A.III.5.

h. Emission Limitation:

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

Applicable Compliance Method:

The annual PE, PM10, SO₂ emission rates are based on this emissions unit's uncontrolled potential to emit from the drying hoods. The annual PE, PM10, SO₂ emission rates were calculated by the following equations using the

Emissions Unit ID: P101

information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

For natural gas combustion:

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

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

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

For LPG (propane) combustion:

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

E_{PM10} = heat input capacity of 35 mmBtu/hour x 0.0121lb of PM10/mmBtu per AP-42 Table 1.5-1 for natural gas combustion x 8760 hours/(2000)];

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

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

i. Emission Limitation:

SO2 emissions shall not exceed 194.7 pounds per hour.

Applicable Compliance Method:

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

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

For natural gas combustion:

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

For LPG (propane) combustion:

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

where E = Emission Rate (pounds per hour).

2. Emission Testing Requirements

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

- a. 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 this permit to install.
- b. The emission testing shall be conducted to confirm the emission factor of 0.9352 lb of VOC per machine dried tons paper (MDTP) provided by the permittee in the PTI application 14-05967, submitted July 27, 2007, which is used to demonstrate compliance with the mass allowable VOC emission limitation for this emission unit and the allowable annual VOC emission limitation contained in this permit to install for emissions units P101 and P102, combined.
- c. The following test method(s) shall be employed to demonstrate compliance with the VOC emission rate(s):

40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 25 or 25A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.
- d. The test shall be conducted while the emissions unit is operating at worst case emission rate conditions, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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). The test notification shall include a description of the process parameters identified as being worst case for the proposed emissions

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test. Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

- f. Not later than 30 days prior to the proposed test date(s), the permittee shall conduct an onsite pre-test meeting with personnel from the Hamilton County Department of Environmental Services to review the proposed test plan and emission unit operations.
 - g. Personnel from the Hamilton County Department of Environmental Services 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.
 - h. 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services.
3. Compliance with the rolling 12-month VOC input restriction for off-line wire and felt cleaning operations specified in Section A.II.3 shall be determined by the record keeping requirements specified in Section A.III.3.
 4. Compliance with the rolling 12-month MDTP processing rate restriction specified in Section A.II.4 shall be determined by the record keeping requirements specified in Section A.III.4.

VI. Miscellaneous Requirements

1. The terms and conditions in this permit to install shall supercede the terms and conditions for emissions unit P101 contained in permit to install No. 14-04560, issued March 18, 2004.
2. 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 this 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,

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the non-attainment new source review requirements do not apply for PM10 and PM2.5.

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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 -(P101) - Paper Machine No. 1, including 35 mmBtu/hour natural gas/LPG-fired drying hoods and off-line wire and felt cleaning - Modification

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	See Section B.VI.1.

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

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply

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

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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 -(P102) - Paper Machine No. 2, including 27.2 mmBtu/hour natural gas/LPG-fired drying hoods and off-line wire and felt cleaning - Modification

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 5.67 pounds per hour*, excluding off-line wire & felt cleaning and drying hoods.</p> <p>The drying hoods on this emissions unit shall not exceed the following emission limitations:</p> <p>When burning natural gas, 2.67 pounds of nitrogen oxides (NOx) per hour*, and 0.15 pound of VOC per hour*.</p> <p>When burning LPG (propane), 5.65 pounds of nitrogen oxides (NOx) per hour*, and 0.09 pound of VOC per hour*.</p> <p>*The hourly emission limitations outlined above are based on the emission unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.</p> <p>See terms and conditions A.I.2.a.i.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G) and OAC rule 3745-31-05(C).</p>

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OAC rule 3745-31-05(C) Voluntary Restriction to Avoid Non-Attainment New Source Review and Prevention of Significant Deterioration	See terms and conditions A.I.2.a.ii, A.I.2.b, A.I.2.c, A.II.3, and A.II.4.
OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack associated with this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
OAC rule 3745-21-07(G)	Exempt. See term and condition A.II.1.
OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO ₂) emissions shall not exceed 100.76 pounds per hour.
ORC rule 3704.03(T)(4)	See terms and conditions A.I.2.d.

2. Additional Terms and Conditions

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

- i. 325 pounds of VOC per hour*; and
- ii. 39 TPY of VOC, based upon a rolling, 12-month summation.

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

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

68.07 TPY of VOC.

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

1.07 TPY of PE;

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2.59 TPY of particulate matter 10 microns and less in diameter PM10;
39.9 TPY of NO_x; and
1.47 TPY of VOC.

- 2.d** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO₂, PE, PM10, and carbon monoxide (CO) emissions associated with this air contaminant source since the uncontrolled potential to emit for SO₂, PE, PM10, and CO is less than 10 TPY.
- 2.e** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations, the use of natural gas and/or propane, and the use of non-photochemically reactive materials.

II. Operational Restrictions

1. This emissions unit currently does not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).
2. The permittee shall burn only natural gas or LPG (propane) in this emissions unit.
3. The maximum annual VOC input, as applied, of liquid organic materials employed by the off-line wire and felt cleaning operations in emissions units P101 and P102, combined, shall not exceed 39 tons per year as a rolling 12-month summation. The VOC input shall be determined by multiplying the gallons of liquid organic materials employed per month by the VOC content of each liquid organic material (see record keeping requirements in term A.III.3).

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

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

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

III. Monitoring and/or Recordkeeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.

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3. The permittee shall collect and record the following information each month for emissions units P101 and P102, combined, from the off-line wire and felt cleaning operations:
 - a. the name and identification of each solvent employed;
 - b. the VOC content of each solvent employed, in pounds per gallon;
 - c. the number of gallons of each solvent employed;
 - d. the monthly VOC input (the summation of the results of the value from line b. multiplied by the value from line c. for each liquid organic material employed);
 - e. the updated rolling, 12-month summation total, in tons, of VOC input (the total amount of VOC input for the current month recorded in line c. plus the total amount of VOC input for the previous eleven calendar months); and
 - f. the updated rolling, 12-month summation total, in tons, of VOC emissions (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months), assuming 100 percent of VOC input value from line e. is emitted to the air.

4. The permittee shall collect and record the following information each month for emissions units P101 and P102, combined, excluding off-line wire and felt cleaning and the drying hoods:
 - a. the total amount of machine dried tons of paper (MDTP), in tons per month;
 - b. the updated rolling, 12-month summation of MDTP, in tons (the total amount of tons for the current month plus the total amount of tons for the previous eleven calendar months);
 - c. the total emissions, in tons, of VOC calculated by the following equation:
$$E = [(MDTP/month \text{ for emissions unit P101} \times 0.9352 \text{ lbs VOC/MDTP}^*) + (MDTP/month \text{ for emissions unit P102} \times 0.9292 \text{ lbs VOC/MDTP}^*)]/2000,$$
where E = Emissions Rate (tons per month).

*as provided in the supporting emissions test data contained in the PTI

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application 14-05967, submitted July 27, 2007, or the emissions factors established during the most recent emissions test for these emissions units.

- d. the updated rolling, 12-month summation emissions total, in tons, of VOC (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).
5. The permittee shall collect and record the following information each month for emissions units P101 and P102:
- a. the combined amount of LPG used in the drying hoods associated with emissions units P101 and P102, in gallons per month;
 - b. the combined amount of natural gas used in the drying hoods associated with emissions units P101 and P102, in cubic feet per month;
 - c. the monthly combined PE, PM10, NO_x, VOC emissions from the drying hoods associated with emissions units P101 and P102; and
 - d. the updated, rolling, 12-month summation of PE, PM10, VOC, and NO_x emissions from the drying hoods associated with emissions units P101 and P102 combined (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance 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 LPG (propane). The notification shall include a copy of such record and shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the deviation occurs.
3. The permittee shall submit annual reports that specify the total VOC and NO_x emissions from this emissions unit for the calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit the annual Fee Emission Report.

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4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. an identification of all exceedances of the rolling, 12-month VOC input operational restriction for the off-line wire and felt cleaning operations on emissions units P101 and P102, combined, as specified in Section A.II.3;
 - b. an identification of all exceedances of the rolling, 12-month emissions limitation for VOC from the off-line wire and felt cleaning operations on emissions units P101 and P102, combined, as specified in Section A.I.2.a.ii;
 - c. an identification of all exceedances of the rolling, 12-month MDTP operational restriction for emissions units P101 and P102, combined, as specified in Section A.II.4;
 - d. an identification of all exceedances of the rolling, 12-month emissions limitation for VOC for emissions units P101 and P102, combined, (excluding drying hoods and off-line wire/felt cleaning operations), as specified in Section A.I.2.b; and
 - f. an identification of all exceedances of the rolling, 12-month emission limitations for PE, PM₁₀, VOC, and NO_x from the drying hoods on emissions units P101 and P102, combined, when burning any combination of natural gas or LPG, as specified in Section A.I.2.c.
5. The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit unless otherwise specified.

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 methods:
 - a. Emission Limitation:

VOC emissions shall not exceed 5.67 pounds per hour, excluding off-line wire & felt cleaning and drying hoods.

Applicable Compliance Method:

The hourly VOC emission rate is based on this emissions unit's uncontrolled

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potential to emit, excluding off-line wire & felt cleaning and drying hoods. The hourly VOC emission rate was calculated by the following equation using the information and emission test data submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

E = the maximum machine dried tons paper (MDTP) capacity of 6.1 tons/hour x 0.9292 lbs VOC/MDTP per permittee-supplied 1997 emissions test data from paper making operations;

where E = Emission Rate (pounds per hour).

b. Emission Limitations:

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

2.67 lbs of NO_x/hour when burning natural gas;
 0.15 lb of VOC/hour when burning natural gas;
 5.65 lbs of NO_x/hour when burning LPG; and
 0.09 lb of VOC/hour when burning LPG.

Applicable Compliance Method:

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

For natural gas combustion:

E_{VOC} = heat input capacity of 27.2 mmBtu/hour x 0.00539 lb of VOC/mmBtu per AP-42 Table 1.4-2 for natural gas combustion;

E_{NO_x} = heat input capacity of 27.2 mmBtu/hour x 0.098 lb of NO_x/mmBtu per AP-42 Table 1.4-1 for natural gas combustion; and

For LPG (propane) combustion:

E_{NO_x} = heat input capacity of 27.2 mmBtu/hour x 0.2076 lb of NO_x/mmBtu per AP-42 Table 1.5-1 for LPG combustion;

E_{VOC} = heat input capacity of 27.2 mmBtu/hour x 0.00328 lb of VOC/mmBtu per AP-42 Table 1.5-1 for LPG combustion;

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

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c. Emission Limitation:

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

Applicable Compliance Method:

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

d. Emission Limitations:

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

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

Applicable Compliance Method:

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

$E = \text{maximum solvent usage rate of 50 gallons per hour} \times 6.5 \text{ lbs of VOC per gallon of solvent};$

where $E = \text{Emission Rate (pounds per hour)}$.

Compliance with the annual VOC emission limitation shall be determined by compliance with the VOC input restriction specified in Section A.II.3 and the record keeping requirements specified in Section A.III.3.

e. Emission Limitation:

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

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Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by compliance with the MDTP operational restriction specified in Section A.II.4, record keeping requirements specified in Section A.III.4, and the emission testing as specified in Section A.V.2.

f. Emission Limitations:

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

- 1.07 TPY of PE;
- 2.59 TPY of PM10;
- 39.9 TPY of NO_x; and
- 1.47 TPY of VOC.

Applicable Compliance Method:

Compliance with the PE, PM10, VOC, and NO_x emission limitations specified above shall be determined by the record keeping requirements specified in Section A.III.5.

g. Emission Limitation:

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

Applicable Compliance Method:

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

For natural gas combustion:

$$E_{PE} = \text{heat input capacity of } 27.2 \text{ mmBtu/hour} \times 0.0019 \text{ lb of PE/mmBtu per}$$

Emissions Unit ID: P102

AP-42 Table 1.4-2 for natural gas combustion x 8760 hours/(2000)];

$E_{PM_{10}}$ = heat input capacity of 27.2 mmBtu/hour x 0.0075 lb of PM10/mmBtu per AP-42 Table 1.4-2 for natural gas combustion x 8760 hours/(2000)];

E_{CO} = heat input capacity of 27.2 mmBtu/hour x 0.082 lb of CO/mmBtu per AP-42 Table 1.4-1 for natural gas combustion x 8760 hours/(2000)];

E_{SO_2} = heat input capacity of 27.2 mmBtu/hour x 0.00058 lb of SO2/mmBtu per AP-42 Table 1.4-2 for natural gas combustion x 8760 hours/(2000)]; and

For LPG (propane) combustion:

E_{PE} = heat input capacity of 27.2 mmBtu/hour x 0.00656 lb of PE/mmBtu per AP-42 Table 1.5-1 for LPG combustion x 8760 hours/(2000)];

$E_{PM_{10}}$ = heat input capacity of 27.2 mmBtu/hour x 0.0121lb of PM10/mmBtu per AP-42 Table 1.5-1 for natural gas combustion x 8760 hours/(2000)];

E_{CO} = heat input capacity of 27.2 mmBtu/hour x 0.035 lb of CO/mmBtu per AP-42 Table 1.4-1 for natural gas combustion x 8760 hours/(2000)];

E_{SO_2} = heat input capacity of 27.2 mmBtu/hour x 0.00019 lbs SO2/mmBtu per AP-42 Table 1.5-1 for LPG combustion, using a sulfur content of 0.18 gr/100ft³ x 8760 hours/(2000)];

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

h. Emission Limitation:

SO2 emissions shall not exceed 100.76 pounds per hour.

Applicable Compliance Method:

The hourly SO2 emission rate is based on the equation in OAC rule 3745-18-06(E)(2) using a process weight rate of 6.1 MDTP per hour.

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

For natural gas combustion:

E = heat input capacity of 27.2 mmBtu/hour x 0.00058 lb of SO2/mmBtu per AP-42 Table 1.4-2 for natural gas combustion; and

For LPG (propane) combustion:

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$E = \text{heat input capacity of } 27.2 \text{ mmBtu/hour} \times 0.00019 \text{ lb of SO}_2/\text{mmBtu per AP-42 Table 1.5-1 for LPG combustion, using a sulfur content of } 0.18 \text{ gr}/100\text{ft}^3;$

where $E = \text{Emission Rate (pounds per hour)}$.

2. Emission Testing Requirements

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

- a. 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 this permit to install.
- b. The emission testing shall be conducted to confirm the emission factor of 0.9352 lb of VOC per machine dried tons paper (MDTP) provided by the permittee in the PTI application 14-05967, submitted July 27, 2007, which is used to demonstrate compliance with the mass allowable VOC emission limitation for this emissions unit and the allowable annual VOC emission limitation contained in this permit to install for emissions units P101 and P102, combined.

- c. The following test method(s) shall be employed to demonstrate compliance with the VOC emission rate(s):

40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 25 or 25A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.

- d. The test shall be conducted while the emissions unit is operating at worst case emission rate conditions, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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). The test notification shall include a description of the process parameters identified as being worst case for the proposed emissions

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test. Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

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- f. Not later than 30 days prior to the proposed test date(s), the permittee shall conduct an onsite pre-test meeting with personnel from the Hamilton County Department of Environmental Services to review the proposed test plan and emission unit operations.
 - g. Personnel from the Hamilton County Department of Environmental Services 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.
 - h. 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services.
3. Compliance with the rolling 12-month VOC input restriction for off-line wire and felt cleaning operations specified in Section A.II.3 shall be determined by the record keeping requirements specified in Section A.III.3.
 4. Compliance with the rolling 12-month MDTP processing rate restriction specified in Section A.II.4 shall be determined by the record keeping requirements specified in Section A.III.4.

VI. Miscellaneous Requirements

1. The terms and conditions in this permit to install shall supercede the terms and conditions for emissions unit P101 contained in permit to install No. 14-04560, issued March 18, 2004.
2. 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 this permit to install, pursuant to this USEPA guidance, PM₁₀ was considered a surrogate

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for PM2.5. Since the PM10 emissions are less than the major modification threshold, the non-attainment new source review requirements do not apply for PM10 and PM2.5.

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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 -(P102) - Paper Machine No. 2, including 27.2 mmBtu/hour natural gas/LPG-fired drying hoods and off-line wire and felt cleaning - Modification

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	See Section B.VI.1.

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

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply

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

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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 -(P103) - Natural De-Inking - Modification

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See term and condition A.I.2.a.
OAC rule 3745-31-05(C) Voluntary Restriction to Avoid Non-Attainment New Source Review	See terms and conditions A.I.2.b and A.II.2.
OAC rule 3745-21-07(G)	Exempt. See term and condition A.II.1.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons per year (TPY).
- 2.b The maximum total annual emissions from emissions units P103, P104, and P107, combined, shall not exceed the following emission limitation based upon a rolling, 12-month summation:

4.67 TPY of VOC.

II. Operational Restrictions

1. This emissions unit currently does not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).

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2. The maximum annual processing rate for emissions units P103, P104, and P107, combined, shall not exceed 300,000 tons per year of waste paper (does not include virgin pulp or broke), based upon a rolling, 12-month summation of machine dried tons input (MDTI).

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

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.
2. The permittee shall collect and record the following information each month for emissions units P103, P104, and P107, combined:
 - a. the total amount of machine dried tons of input (MDTI), in tons per month;
 - b. the updated rolling, 12-month summation of MDTI, in tons (the total amount of tons for the current month plus the total amount of tons for the previous eleven calendar months);
 - c. the total emissions, in tons, of VOC calculated by taking the monthly MDTI value from term A.III.2.a above and multiplying by the emissions factor of 0.0311 lb of VOC/MDTI, as provided in the supporting emissions test data contained in the PTI application 14-05967, submitted July 27, 2007, or the emissions factor established during the most recent emissions test for these emissions units, then dividing by 2000; and
 - d. the updated rolling, 12-month summation emissions total, in tons, of VOC (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental

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Services within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. an identification of all exceedances of the rolling, 12-month MDTI operational restriction for emissions units P103, P104, and P107, combined, as specified in Section A.II.2; and
 - b. an identification of all exceedances of the rolling, 12-month emissions limitation for VOC for emissions units P103, P104, and P107, combined, as specified in Section A.I.2.b.
3. The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit unless otherwise specified.

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 methods:
 - a. Emission Limitation:

The uncontrolled potential to emit for this emissions unit is less than 10.0 TPY of VOC.

Applicable Compliance Method:

The annual VOC emissions rate is based on this emissions unit's uncontrolled potential to emit. The annual VOC emissions rate was calculated by the following equation using the information and emission test data submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

$$E = \text{machine dried recycled input rate of 12.3 tons/hour} \times 0.0311 \text{ lb of VOC/MDTI per permittee-supplied 2003 emission test data from de-inking operations} \times 8760 \text{ hours}/(2000);$$

where E = Emission Rate (tons per year).
 - b. Emission Limitation:

4.67 TPY of VOC, for emissions units P103, P104, and P107, combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

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Compliance with the VOC emission limitation specified above shall be determined by the record keeping requirements specified in Section A.III.2 and the emission testing specified in Section A.V.2.

2. Emission Testing Requirements

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

- a. 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 this permit to install.
- b. The emission testing shall be conducted to confirm the emission factor of 0.0311 lb of VOC per machine dried tons input (MDTI) provided by the permittee in the PTI application 14-05967, submitted July 27, 2007, which is used to demonstrate compliance with the combined allowable VOC emission limitation contained in this permit to install for emissions units P103, P104, and P107.
- c. The following test method(s) shall be employed to demonstrate compliance with the VOC emission rate(s):

40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 25 or 25A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.

- d. The test shall be conducted while the emissions unit is operating at worst case emission rate conditions, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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). The test notification shall include a description of the process parameters identified as being worst case for the proposed emissions test. Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services

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refusal to accept the results of the emission test(s).

- f. Not later than 30 days prior to the proposed test date(s), the permittee shall conduct an onsite pre-test meeting with personnel from the Hamilton County Department of Environmental Services to review the proposed test plan and emission unit operations.
 - g. Personnel from the Hamilton County Department of Environmental Services 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.
 - h. 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services.
3. Compliance with the rolling 12-month MDTI processing rate restriction specified in Section A.II.2 shall be determined by the record keeping requirements specified in Section A.III.2.

VI. Miscellaneous Requirements

- 1. The terms and conditions in this permit to install shall supercede the terms and conditions for emissions unit P103 contained in permit to install No. 14-04560, issued March 18, 2004.

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 - (P103) - Natural De-Inking - Modification

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	See Section B.VI.1.

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

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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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 - (P104) - Bleach De-Inking - Modification

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See term and condition A.I.2.a.
OAC rule 3745-31-05(C) Voluntary Restriction to Avoid Non-Attainment New Source Review	See terms and conditions A.I.2.b and A.II.2.
OAC rule 3745-21-07(G)	Exempt. See term and condition A.II.1.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons per year (TPY).
- 2.b The maximum total annual emissions from emissions units P103, P104, and P107, combined, shall not exceed the following emission limitation based upon a rolling, 12-month summation:

4.67 TPY of VOC.

II. Operational Restrictions

1. This emissions unit currently does not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).

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2. The maximum annual processing rate for emissions units P103, P104, and P107, combined, shall not exceed 300,000 tons per year of waste paper (does not include virgin pulp or broke), based upon a rolling, 12-month summation of machine dried tons input (MDTI).

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

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.
2. The permittee shall collect and record the following information each month for emissions units P103, P104, and P107, combined:
 - a. the total amount of machine dried tons of input (MDTI), in tons per month;
 - b. the updated rolling, 12-month summation of MDTI, in tons (the total amount of tons for the current month plus the total amount of tons for the previous eleven calendar months);
 - c. the total emissions, in tons, of VOC calculated by taking the monthly MDTI value from term A.III.2.a above and multiplying by the emissions factor of 0.0311 lb of VOC/MDTI, as provided in the supporting emissions test data contained in the PTI application 14-05967, submitted July 27, 2007, or the emissions factor established during the most recent emissions test for these emissions units, then dividing by 2000; and
 - d. the updated rolling, 12-month summation emissions total, in tons, of VOC (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

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- a. an identification of all exceedances of the rolling, 12-month MDTI operational restriction for emissions units P103, P104, and P107, combined, as specified in Section A.II.2; and
 - b. an identification of all exceedances of the rolling, 12-month emissions limitation for VOC for emissions units P103, P104, and P107, combined, as specified in Section A.I.2.b.
3. The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit unless otherwise specified.

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 methods:

a. Emission Limitation:

The uncontrolled potential to emit for this emissions unit is less than 10.0 TPY of VOC.

Applicable Compliance Method:

The annual VOC emission rate is based on this emissions unit's uncontrolled potential to emit. The annual VOC emission rate was calculated by the following equation using the information and emission test data submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

$E = \text{machine dried recycled input rate of } 24.7 \text{ tons/hour} \times 0.0311 \text{ lb of VOC/MDTI per permittee-supplied 2003 emission test data from de-inking operations} \times 8760 \text{ hours}/(2000)$;

where E = Emission Rate (tons per year).

b. Emission Limitation:

4.67 TPY of VOC, for emissions units P103, P104, and P107, combined, based upon a rolling, 12-month summation.

Emissions Unit ID: P104

Applicable Compliance Method:

Compliance with the VOC emission limitation specified above shall be determined by the record keeping requirements specified in Section A.III.2 and the emission testing specified in Section A.V.2.

2. Emission Testing Requirements

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

- a. 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 this permit to install.
- b. The emission testing shall be conducted to confirm the emission factor of 0.0311 lb of VOC per machine dried tons input (MDTI) provided by the permittee in the PTI application 14-05967, submitted July 27, 2007, which is used to demonstrate compliance with the combined allowable VOC emission limitation contained in this permit to install for emissions units P103, P104, and P107.
- c. The following test method(s) shall be employed to demonstrate compliance with the VOC emission rate(s):

40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 25 or 25A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.
- d. The test shall be conducted while the emissions unit is operating at worst case emission rate conditions, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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). The test notification shall include a description of the process parameters identified as being worst case for the proposed emissions test. Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall conduct an onsite pre-test meeting with personnel from the Hamilton County

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Department of Environmental Services to review the proposed test plan and emission unit operations.

- g. Personnel from the Hamilton County Department of Environmental Services 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.
 - h. 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services.
3. Compliance with the rolling 12-month MDTI processing rate restriction specified in Section A.II.2 shall be determined by the record keeping requirements specified in Section A.III.2.

VI. Miscellaneous Requirements

- 1. The terms and conditions in this permit to install shall supercede the terms and conditions for emissions unit P103 contained in permit to install No. 14-04560, issued March 18, 2004.

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 - (P104) - Bleach De-Inking - Modification

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	See Section B.VI.1.

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

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

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 -(P107) - Broke System

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See term and condition A.I.2.a.
OAC rule 3745-31-05(C) Voluntary Restriction to Avoid Non-Attainment New Source Review	See terms and conditions A.I.2.b and A.II.2.
OAC rule 3745-21-07(G)	Exempt. See term and condition A.II.1.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the volatile organic compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for VOC is less than 10 tons per year (TPY).
- 2.b The maximum total annual emissions from emissions units P103, P104, and P107, combined, shall not exceed the following emissions limitation based upon a rolling, 12-month summation:

4.67 tons per year (TPY) of Volatile Organic Compounds (VOC).

II. Operational Restrictions

1. This emissions unit currently does not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).
2. The maximum annual processing rate for emissions units P103, P104, and P107, combined, shall not exceed 300,000 tons per year of waste paper (does not include virgin pulp or broke), based upon a rolling, 12-month summation of machine dried tons

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input (MDTI).

The permittee has existing records to demonstrate compliance upon issuance of this permit, therefore first year machine dried tons input (MDTI) amounts are not necessary.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.
2. The permittee shall collect and record the following information each month for emissions units P103, P104, and P107, combined:
 - a. the total amount of machine dried tons of input (MDTI), in tons per month;
 - b. the updated rolling, 12-month summation of MDTI, in tons (the total amount of tons for the current month plus the total amount of tons for the previous eleven calendar months);
 - c. the total emissions, in tons, of VOC calculated by taking the monthly MDTI value from term A.III.2.a above and multiplying by the emission factor of 0.0311 lb of VOC/MDTI, as provided in the supporting emission test data contained in the PTI application 14-05967, submitted July 27, 2007, or the emissions factor established during the most recent emissions test for these emissions units, then dividing by 2000; and
 - d. the updated rolling, 12-month summation emissions total, in tons, of VOC (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).

IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all

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exceedances of the following:

- a. an identification of all exceedances of the rolling, 12-month MDTI operational restriction for emissions units P103, P104, and P107, combined, as specified in Section A.II.2; and
 - b. an identification of all exceedances of the rolling, 12-month emissions limitation for VOC for emissions units P103, P104, and P107, combined, as specified in Section A.I.2.b.
3. The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit unless otherwise specified.

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 methods:

a. Emission Limitation:

The uncontrolled potential to emit for this emissions unit is less than 10.0 TPY of VOC.

Applicable Compliance Method:

The annual VOC emission rate is based on this emissions unit's uncontrolled potential to emit. The annual VOC emission rate was calculated by the following equation using the information and emission test data submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

$$E = \text{machine dried recycled input rate of 6.8 tons/hour} \times 0.0311 \text{ lb of VOC/MDTI per permittee-supplied 2003 emission test data from de-inking operations} \times 8760 \text{ hours}/(2000)];$$

where E = Emission Rate (tons per year).

b. Emission Limitation:

4.67 TPY of VOC, for emissions units P103, P104, and P107, combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the VOC emission limitation specified above shall be determined by the record keeping requirements specified in Section A.III.2 and

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the emission testing specified in Section A.V.2.

2. Emission Testing Requirements

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

- a. 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 this permit to install.
- b. The emission testing shall be conducted to confirm the emission factor of 0.0311 lb of VOC per machine dried tons input (MDTI) provided by the permittee in the PTI application 14-05967, submitted July 27, 2007, which is used to demonstrate compliance with the combined allowable VOC emission limitation contained in this permit to install for emissions units P103, P104, and P107.
- c. The following test method(s) shall be employed to demonstrate compliance with the VOC emission rate(s):

40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 25 or 25A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.

- d. The test shall be conducted while the emissions unit is operating at worst case emission rate conditions, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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). The test notification shall include a description of the process parameters identified as being worst case for the proposed emissions test. Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall

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conduct an onsite pre-test meeting with personnel from the Hamilton County Department of Environmental Services to review the proposed test plan and emission unit operations.

- g. Personnel from the Hamilton County Department of Environmental Services 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.
 - h. 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 Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services.
3. Compliance with the rolling 12-month MDTI processing rate restriction specified in Section A.II.2 shall be determined by the record keeping requirements specified in Section A.III.2.

VI. Miscellaneous Requirements

None

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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 -(P107) - Broke System

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	See Section B.VI.1.

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

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the

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composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.