



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION  
BUTLER COUNTY  
Application No: 14-03948  
Fac ID: 1409040212**

**CERTIFIED MAIL**

**DATE: 8/30/2005**

SMART Papers LLC  
Kenneth Hardesty  
601 North B Street  
Hamilton, OH 45013

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of \$ 0 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 Governments

KY

IN

**BUTLER COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 14-03948 FOR AN AIR CONTAMINANT SOURCE FOR  
SMART Papers LLC**

On 8/30/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **SMART Papers LLC**, located at **601 North B St, Hamilton, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-03948:

**Administrative Modification of PTI 14-03948 For Emissions Unit B020 - 249 MMBtu/hr Coal and TDF  
BOiler with ESP.**

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 MODIFICATION OF PERMIT TO INSTALL 14-03948**

Application Number: 14-03948  
Facility ID: 1409040212  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: SMART Papers LLC  
Person to Contact: Kenneth Hardesty  
Address: 601 North B Street  
Hamilton, OH 45013

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**601 North B St  
Hamilton, Ohio**

Description of proposed emissions unit(s):  
**Administrative Modification of PTI 14-03948 For Emissions Unit B020 - 249 MMBTU/hr Coal and TDF Boiler with ESP.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

SMART Papers LLC

Facility ID: 1409040212

PTI Application: 14-03948

Issued: To be entered upon final issuance

**Part I - GENERAL TERMS AND CONDITIONS**

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

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

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

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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.8 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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

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

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

## **3. Risk Management Plans**

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

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

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**4. Title IV Provisions**

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

**5. Severability Clause**

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

**6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the

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

**SMART Papers LLC****Facility ID: 1409040212****PTI Application: 14-03948****Issued: To be entered upon final issuance****7. Fees**

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

**8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

**9. Compliance Requirements**

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

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

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

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

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

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

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

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**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.

**13. Permit-To-Install**

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

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

**1. Compliance Requirements**

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

**2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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

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**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.

**SMART Papers LLC****Facility ID: 1409040212****PTI Application: 14-03948****Issued: To be entered upon final issuance****4. Authorization To Install or Modify**

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

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

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**6. Public Disclosure**

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

**7. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

SMART Papers LLC

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**8. Construction Compliance Certification**

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

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

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

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

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	118
PM <sub>10</sub>	77.2
SO <sub>2</sub>	1854
NO <sub>x</sub>	716
CO	223
NMOC	4.9
Beryllium	0.08
Cadmium	0.05
Barium	0.02
Chromium	1.66
Lead	0.54
Mercury	0.02
Nickel	1.4
Zinc	0.3
Hydrogen Chloride	159
Chlorine	3.3

**SMART Papers LLC**

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**SMAF****PTI A**Emissions Unit ID: **B020****Issued: To be entered upon final issuance****Part II - FACILITY SPECIFIC TERMS AND CONDITIONS****A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions****1. MACT REQUIREMENTS**

The permittee is subject to the applicable emission limitation(s) and/or control measures, operational restrictions, monitoring and/or record keeping requirements, reporting requirements, testing requirements and the general and/or other requirements specified in 40 CFR Part 63, Subpart DDDDD (NESHAP for Industrial/Commercial/Institutional Boilers and Process Heaters), in accordance with 40 CFR Parts 63.7480 through 63.7575 (including the Table(s) and Appendix(ices) referenced in Subpart DDDDD).

Ordinarily, these requirements would be incorporated into Part II of this permit; however, incorporating Subpart DDDDD into Part II of this permit was not practical due to technical incompatibilities and the limitations of the software program. In addition, numerous difficulties were encountered in attempting to copy and paste the Subpart's tables and/or equations into software program format.

The following emissions units in this permit are subject to the aforementioned requirements:

Emissions unit B020

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

None

**SMAF**

**PTI A**

Emissions Unit ID: **B020**

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

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
B020 - 249 MMBtu/hour coal and tire derived fuel boiler with an ESP - second modification	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)
	OAC rule 3745-17-10(C)
	OAC rule 3745-18-15(L)

Issue

Emissions Unit ID: **B020**

40 CFR 60 Subpart D and Db

Applicable Emissions  
Limitations/Control Measures

requirements of OAC rule 3745-17-07(A), 3745-17-10(C) and 3745-18-15(L).

40 CFR Part 63, Subpart DDDDD

- 118 TPY Particulate emissions
- 0.072 lb. PM<sub>10</sub>/MMBtu of actual heat input,\*
- 77.2 TPY PM<sub>10</sub>
- 1854 TPY SO<sub>2</sub>
- 163.5 lbs. NO<sub>x</sub>/hour\*
- 716 TPY NO<sub>x</sub>
- 51.0 lbs. CO/hour\*
- 223 TPY CO
- 1.12 lbs. nonmethane OC/hour\*
- 4.9 TPY nonmethane OC
- 0.018 lb. Beryllium/hour\* ,
- 0.08 TPY Beryllium
- 0.011 lb. Cadmium/hour\*
- 0.05 TPY Cadmium
- 0.0045 lb. Barium/hour\*
- 0.02 TPY Barium
- 0.38 lb. Chromium/hour\*
- 1.66 TPY Chromium
- 0.12 lb. Lead/hour\*
- 0.54 TPY Lead
- 0.004 lb. Mercury/hour\*
- 0.02 TPY Mercury
- 0.32 lb. Nickel/hour\*
- 1.4 TPY Nickel
- 0.063 lb. Zinc/hour\*
- 0.3 TPY Zinc
- 36.41 lbs. HCl/hour\*
- 159 TPY HCl
- 0.75 lb/ Chlorine/hour\*
- 3.3 TPY Cl

See term A.VI.1.

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

0.11 lb. Particulate emissions/MMBtu of actual heat input

1.7 lbs. SO<sub>2</sub>/MMBtu

See term A.II.1.

The limitations specified by these rules are not applicable to B020.

See Attachment 1 of this permit.

\* The hourly emissions limitations outlined above are based on the emission unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

The requirements of this rule also include compliance with the

**SMAF**

**PTI A**

Emissions Unit ID: **B020**

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**2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limitations, compliance with all applicable regulations, record keeping and reporting required by this permit.

**SMAF****PTI A**Emissions Unit ID: **B020****Issued: To be entered upon final issuance****II. Operational Restrictions**

1. Pursuant to OAC rule 3745-18-15(L) and OAC rule 3745-31-05(A)(3), the total combined daily average operation rate of boilers 10 and 14 (OEPA emissions unit numbers B010 and B020) shall not exceed 603 million BTU per hour of actual heat input.
2. Pursuant to OAC rule 3745-31-05(A)(3), the total heat input for emissions unit B020 is reduced from 249 MMBTU/hr and 192,800 pounds steam per hour at maximum to 188 MMBTU/hr when burning tire derived fuel. (The reduced total heat input of 188 MMBTU/hr corresponds to a steam load of 146,000 lbs/hr.). The heat input limit is based on the maximum operating rate of the boiler during the performance test conducted in 1999 when tire derived fuel was burned.
3. Pursuant to OAC rule 3745-31-05(A)(3), the amount of tire derived fuel fired in emissions unit B020 shall not exceed 30% by weight of the total fuel fired to the boiler on a daily basis.

**III. Monitoring and/or Record keeping Requirements**

1. This permittee shall collect or require the coal supplier to collect a representative sample of coal for each shipment of coal which is received for burning in this emissions unit. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each month, the representative samples of coal from all shipments of coal which were received during that month shall be combined into one composite sample. This combination may be a physical composite or a weighted average of the test data for the individual shipments.

Each monthly composite sample of coal shall be analyzed for sulfur content (percent) and heat content (Btu/pound of coal). The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the most recent version of the following ASTM methods: 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. Alternative, equivalent methods may be used upon written approval from the Hamilton County Department of Environmental Services.

2. The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of particulate emissions from the common stack serving B010

**SMAF****PTI A**Emissions Unit ID: **B020****Issued: To be entered upon final issuance**

and B020. The opacity of the visible particulate emissions from B010 and B020 shall be monitored in the combined stack for the two boilers and the visible particulate emission limitation specified in Section A.I.1 applies to each individual boiler as monitored at the common stack. An exceedance of the emission limitation in A.I.1. as measured at the common stack does not necessarily constitute an exceedance of the emission limitation for both boilers. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

Each continuous emission monitoring system consists of all equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers and data recording/processing hardware and software.

The permittee shall maintain a certification letter from Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and the magnitude of manual calibration adjustments.

Records documenting activities relating to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

3. To obtain an exemption pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain temperature monitors and recorders that measure and record the temperature of the boiler exhaust gases entering the ESPs during (a) all periods of start-up until the ESPs are operational or until the inlet temperatures of the ESPs achieve the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b) all periods of shutdown until the inlet temperatures of the ESPs drop below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i). An electronic or hardcopy record of the temperatures during periods of start-up and shutdown shall be maintained.

The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in units of degrees Fahrenheit.

4. When burning tire derived fuel, the permittee shall continuously monitor and record the

Emissions Unit ID: **B020**

steam flow rate from emissions unit B020. At no time shall the steam flow rate from emissions unit B020 exceed 146,000 lbs/hr (as an average over any one-hour period) while burning tire derived fuel.

5. The permittee shall collect or require the tire derived fuel supplier to collect a representative sample of tire derived fuel for each shipment of tire derived fuel which is received for burning in this emissions unit. The tire derived fuel sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each month, the representative samples of tire derived fuel for all shipments of tire derived fuel which were received during that month shall be combined into one composite sample. This combination may be a physical composite or a weighted average of the test data for the individual shipments.

Each monthly composite sample of tire derived fuel shall be analyzed for sulfur content (percent), heat content (Btu/pound of tire derived fuel), and chlorine content (percent). The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content, and chlorine content in accordance with the most recent versions of the following ASTM methods: 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; ASTM method D2015, Gross Calorific Value of Coal or Coke by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isoperibol Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively; and ASTM method D2361, Test Method for Chlorine in Coal/Solid Fuel. Alternative, equivalent methods may be used upon written approval from the Hamilton County Department of Environmental Services.

6. Each day that tire derived fuel is co-fired in emissions unit B020, the permittee shall record and maintain the following information:
  - a. The amount of coal burned (tons);
  - b. The amount of tire derived fuel burned (tons);
  - c. The percent of tire derived fuel of the total fuel fired to the boiler by weight; and
  - d. The source of each shipment of tire derived fuel.
7. The permittee shall maintain monthly records of the total quantity of coal burned, the results of the analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu) for all shipments of coal during each calendar month as a volume- weighted average.
8. The permittee shall maintain monthly records of the total quantity of tire derived fuel

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burned, the results of the analyses for sulfur content, chlorine content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu), as a volume-weighted average, for all shipments of tire derived fuel during each calendar month.

9. The permittee shall maintain daily records of the total combined heat input, total combined hours of operation (calculated as the summation of the operating hours for each unit), and the daily average operating rate, in MMBtu/hr, for emissions units B010 and B020. To determine the heat input the permittee shall continuously monitor and record the steam flow rate from each emissions unit.

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1. Quarterly reports concerning the quality and quantity of coal received for burning in this emissions unit shall be submitted to the Hamilton County Department of Environmental Services. 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 sulfur content (percent) of the coal received;
  - c. The average heat content (Btu/lb) of the coal received; and
  - d. The average calculated sulfur dioxide emission rate (lbs sulfur dioxide/MMBtu actual heat input) from the coal received. The equation below from OAC rule 3745-18-04(F)(1) shall be used for this calculation:

$$ER = [(1 \times 10E6)/H] \times S \times 1.9$$

Where ER = The emission rate in pounds of sulfur dioxide per MMBtu;  
H = The heat content of the coal in Btu per pound;  
S = The decimal fraction of sulfur in the coal.

These quarterly reports shall be submitted by January 30, April 30, July 30 and October 30 of each year and shall cover the data obtained during the previous calendar quarter.

2. This permittee shall submit quarterly reports to the Hamilton County Department of Environmental Services that summarize the following information for the emissions unit for each calendar month during the calendar quarter:
  - a. The amount of tire derived fuel burned (tons);
  - b. The average heat content of tire derived fuel (BTU/lb);
  - c. The average sulfur content (percent) of the tire derived fuel received; and
  - d. The average chlorine content of the tire derived fuel received.

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These quarterly reports shall be submitted by January 30, April 30, July 30 and October 30 of each year and shall cover the data obtained during the previous calendar quarter.

3. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Hamilton County Department of Environmental Services documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time reason and corrective action(s) taken for each time period of monitoring system malfunction. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30 and October 30 of each year and shall address the data obtained during the previous calendar quarter.

4. If for any reason the steam flow rate from emissions unit B020 exceeds 146,000 lbs/hr, when burning tire derived fuel, the following information shall be reported to the Ohio EPA field office within 5 business days after the exceedance:
  - a. The date of the exceedance;
  - b. The time interval over which the exceedance occurred;
  - c. The steam flow rate;

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- d. The cause(s) of the exceedance;
  - e. The corrective action which has been or will be taken to prevent similar exceedances in the future; and
  - f. A copy of the steam chart which shows the exceedance.
- 5.** The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the total combined operating rate limitation specified in Section A.II.1.
- The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.
- 6.** The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the tire derived fuel limitation specified in Section A.II.3.
- The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

## **V. Testing Requirements**

- 1.** Compliance with the visible particulate emissions limitation in term A.I.1. shall be determined through visible emissions 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).
- 2.** Compliance with the NO<sub>x</sub>, CO, non-methane organic compounds and PM<sub>10</sub> emission limitations shall be based on calculations using AP-42 Section 1.1 (dated 9/98) or the most recent emission test data because the hourly emissions limitation are based on the emission unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

If required, the permittee shall demonstrate compliance with the NO<sub>x</sub> emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

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

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

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If required, the permittee shall demonstrate compliance with the PM<sub>10</sub> emission limitation through emission tests performed in accordance with 40 CFR Part 51, Appendix M, Methods 1 through 4 and 201.

3. Compliance with the beryllium, cadmium, barium, chromium, lead, mercury, nickel, zinc, hydrogen chloride, and chlorine emission limitations may be demonstrated using calculations based on the emission factors (lb/MMBtu) established during the emission tests performed in January 1999 because the hourly emissions limitations are based on the emission unit's potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

If required, the permittee shall demonstrate compliance with the metals emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 29.

If required, the permittee shall demonstrate compliance with the hydrogen chloride emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 26.

4. Applicable Compliance Method:  
Compliance with the sulfur dioxide emission limitation shall be determined by using the fuel analysis records required pursuant to Sections A.III.1 and A.III.7 and the applicable equation in OAC rule 3745-18-04(F).

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.

5. Compliance with the tire derived fuel limit in Section A.II.3. shall be demonstrated by the record keeping in Section A.III.6.
6. Compliance with the total heat input limit when burning tire derived fuel shall be demonstrated by the record keeping in Section A.III.4.
7. Compliance with the average daily operating rate limitation shall be determined by the record keeping requirements in Section A.III.9 of this permit.

**VI. Miscellaneous Requirements**

1. The permittee is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63, Subpart DDDDD, promulgated

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September 13, 2004. As a result, certain emission limitations, record keeping and reporting requirements established pursuant to OAC rule 3745-31-05(A)(3) and OAC rule 3745-17-10(C) maybe less stringent than emission limitations, record keeping and reporting requirements established pursuant to 40 CFR Part 63, Subpart DDDDD. The permittee shall establish which emission limitations, record keeping and reporting requirements are considered to be in compliance with those regulations and shall comply with whichever is the more stringent emission limitations, record keeping and reporting requirements of those regulations after the September 13, 2007, compliance date in 40 CFR Part 63, Subpart DDDDD.

The permittee shall forward a report within ninety days after September 13, 2007, to the Hamilton County Department of Environmental Services documenting which emission limitations, record keeping, and reporting requirements the permittee deems as compliance with those regulations.

Hamilton County Department of Environmental Services within thirty days of receipt of the above mentioned report submitted by permittee shall forward to the permittee a letter documenting their concurrence of the contents of the report, specify sections of the report that are unacceptable, and/or suggested revisions that would be acceptable to the Hamilton County Department of Environmental Services.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B020 - 249 MMBtu/hour coal and tire derived fuel boiler with an ESP - second modification		

**2. Additional Terms and Conditions**

2.a None

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None

**III. Monitoring and/or Record keeping Requirements**

1. The permit to install for this emissions unit B020 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hydrogen Chloride

TLV (ug/m<sup>3</sup>): 7458

Maximum Hourly Emission Rate (lbs/hr): 36.41

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m<sup>3</sup>): 17.6

MAGLC (ug/m<sup>3</sup>): 178

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

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- b. Changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. Physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
2. If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:"

- a. A description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. Documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. When the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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

None

#### **V. Testing Requirements**

None

#### **VI. Miscellaneous Requirements**

None