

Synthetic Minor Determination and/or Netting Determination

Permit To Install ~~14-5714~~

A. Source Description

Formica Corporation manufactures wood/plastic laminates for countertops. This emission unit provides steam for process power and space heat for the facility. This emissions unit is a 28.7 MMBTU/hr wood waste boiler that is controlled by a baghouse and a multiclone. This boiler was previously derated to 22.0 MMBTU/hr. This proposed permit action will remove the derating.

B. Facility Emissions and Attainment Status

Formica Corporation is designated as a major facility for CO and NOx and is located in Hamilton County which is designated as attainment for CO, SO2, PM and PM10 and non-attainment for ozone (VOC and NOx) and PM 2.5.

C. Source Emissions

This is a Chapter 31 modification that will affect emissions. In removing the derating, some emissions will increase from the allowable rates specified in PTI 14-04800 as modified 6/20/2002, and PM/PM10 will decrease, due to the proposed allowable. The updated net emission changes are listed in the table below.

Pollutant	Net change
PM10	+13.27
NOx	+25.61
CO	+56.36

The detailed net emissions changes are summarized in special term and condition A.VI.1., and are below the major modification levels.

D. Conclusion

Because the federally enforceable terms and conditions in this permit to install limit the emissions rate to below major modification levels, the permittee will not be subject to the Prevention of Significant Deterioration requirements since the increases for PM10, NOx, and CO are below the major modification levels.



State of Ohio Environmental Protection Agency

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

CERTIFIED MAIL

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 14-05714

Fac ID: 1431154026

DATE: 8/30/2005

Formica Corporation
Vanessa Peckinpaugh
10155 Reading Road
Cincinnati, OH 45241

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, 43266-0149.

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 **\$400** 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

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

HAMILTON COUNTY

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **14-05714** FOR AN AIR CONTAMINANT SOURCE FOR **Formica Corporation**

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 **Formica Corporation**, located at **10155 Reading Road, Cincinnati**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 14-05714:

Modification to PTI 14-04800; Increase allowable usage rate for emission unit B004, reverse derating of boiler.

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

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



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 14-05714

Application Number: 14-05714
Facility ID: 1431154026
Permit Fee: **To be entered upon final issuance**
Name of Facility: Formica Corporation
Person to Contact: Vanessa Peckinpaugh
Address: 10155 Reading Road
Cincinnati, OH 45241

Location of proposed air contaminant source(s) [emissions unit(s)]:
**10155 Reading Road
Cincinnati, Ohio**

Description of proposed emissions unit(s):
Modification to PTI 14-04800; Increase allowable usage rate for emission unit B004, reverse derating of boiler.

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

Director

Formica Corporation
PTI Application: 14-05714
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 1431154026

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 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

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more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
- ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

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

11. Best Available Technology

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

12. Air Pollution Nuisance

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

Formica Corporation**Facility ID: 1431154026****PTI Application: 14-05714****Issued: To be entered upon final issuance**

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

5. Construction of New Sources(s)

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

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

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

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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.

Formica Corporation**PTI Application: 14-05714****Issued: To be entered upon final issuance****Facility ID: 1431154026****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/PM10	12.57
NOx	75.9
SO2	1.25
CO	37.7
VOC	4.9

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PTI A

Emissions Unit ID: B004

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

None

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

None

Applicable Emissions
Limitations/Control
Measures

Particulate emissions (PE) and Particulate matter 10 microns and less (PM10) shall not exceed 0.10 lb PE/PM10 per MMBtu and 12.57 TPY PE/PM10.

Sulfur dioxide emissions shall not exceed 0.01 lb SO2/MMBtu and 1.25 TPY.

Carbon monoxide emissions shall not exceed 0.30 lb CO/MMBtu and 37.7 TPY.

Nitrogen oxide emissions shall not exceed 0.604 lb NOx/MMBtu and 75.9 TPY NOx.

Volatile organic compound emissions shall not exceed 0.039 lb VOC/MMBtu and 4.9 TPY VOC.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-21-08(B), OAC rule 3745-23-06(B), and 40 CFR Part 60 Subpart Dc.

See terms and conditions A.I.2.b, A.I.2.d, A.II.1. and A.II.2.

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

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

See terms A.I.2.a, A.I.2.c and A.III 1.

See term A.I.2.e

See term A.I.2.f

Since this emissions unit is considered an existing boiler as outlined in this rule, the permittee must comply with the applicable requirements in this subpart by September 13, 2007.

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.b** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limitations and the use of a baghouse and multiclone.
- 2.c** The SO₂, PE, and visible emissions limitations specified in 40 CFR 60 Subpart Dc do not apply because this emission unit has a maximum rated capacity of less than 30 MMBtu/hr and is restricted to burning only wood waste.
- 2.d** The lb/MMBtu and ton per year emission limitations outlined in term A.I.1, are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these emission limits.
- 2.e** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 14-05697.

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

- 2.f** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 14-05697.

On February 15, 2005, OAC rule 3745-23-06 was rescinded and therefore no longer a part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a

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revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-23-06, the requirement to satisfy "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 2.0 - 10.0 inches of water while the emissions unit is in operation.
2. The permittee shall only burn wood waste in this emission unit.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the type of fuel and the quantity of fuel, including wood waste, burned in this emissions unit.
2. The permittee shall maintain an annual record which summarizes the daily records for the quantity of wood waste burned in this emissions unit.
3. The permittee shall properly install, operate, and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

IV. Reporting Requirements

1. The permittee shall submit annual reports which specify the total NO_x, SO₂, CO, PE and PM₁₀ emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 30 of each year.
2. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified in term A.II.1.

Emissions Unit ID: B004

3. The permittee shall submit deviation (excursion) reports that identify all periods of time during which a fuel other than wood waste was fired in the boiler.
4. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

1. 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 six months after issuance of this permit;
 - b. the emissions testing shall be conducted to demonstrate compliance with the allowable PE, NO_x, CO and VOC emissions limitations while combusting wood waste;
 - c. the following test methods(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 1-5, 7, 10 and 25. Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services;
 - d. testing shall include a determination of heat content of a representative sample of wood waste as fired; and
 - e. the test(s) 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(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

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.

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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.

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

- a. Emission Limitation:

20% opacity, as a six-minute average

Applicable compliance method:

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

- b. Emission Limitations:

0.10 lb PE/PM10 per MMBtu of actual heat input, 12.57 tons per year

Applicable compliance method:

Compliance may be determined by multiplying the actual particulate emission rate (as determined by the latest emissions test) by wood waste usage (in pounds or tons material) and divided by the heat value of the wood waste in MMBtu/lb or ton, depending on the wood waste usage unit used.

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5.

The actual annual emission rate shall be calculated by using the actual fuel usages and emission factors and methodologies specified above.

- c. Emission Limitations:

Emissions Unit ID: B004

0.01 lb SO₂/MMBtu of actual heat input, 1.25 TPY SO₂

Compliance may be determined by multiplying the SO₂ emission factor as supplied by the emissions unit manufacturer as submitted in PTI 14-05714 submitted April 25, 2005, by the wood waste usage (in pounds or tons material) and divided by the heat value of the wood waste in MMBtu/lb or ton, depending on the wood waste usage unit used.

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 6.

The actual annual emission rate shall be calculated by using the actual fuel usages and emission factors and methodologies specified above.

d. Emission Limitations:

0.604 lb NO_x/MMBtu of actual heat input, 75.9 TPY NO_x

Applicable compliance method:

Compliance may be determined by multiplying the actual NO_x emission rate (as determined by the latest emissions test) by wood waste usage (in pounds or tons material) and divided by the heat value of the wood waste in MMBtu/lb or ton, depending on the wood waste usage unit used.

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

The actual annual emission rate shall be calculated by using the actual fuel usages and emission factors and methodologies specified above.

e. Emission Limitations:

0.30 lb CO/MMBtu of actual heat input, 37.7 tons per year

Applicable compliance method:

Compliance may be determined by multiplying the actual CO emission rate (as determined by the latest emissions test) by wood waste usage (in pounds or tons material) and divided by the heat value of the wood waste in MMBtu/lb or ton, depending on the wood waste usage unit used.

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation through emission tests performed in accordance with 40 CFR

Formi

PTI A

Emissions Unit ID: B004

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Part 60, Appendix A, Methods 1- 4, and 10.

The actual annual emission rate shall be calculated by using the actual fuel usages and emission factors and methodologies specified above.

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f. Emission Limitations:

0.039 lb VOC/MMBtu of actual heat input, 4.9 tons per year

Applicable compliance method:

Compliance may be determined by multiplying the actual VOC emission rate (as determined by the latest emissions test) by wood waste usage (in pounds or tons material) and divided by the heat value of the wood waste in MMBtu/lb or ton, depending on the wood waste usage unit used.

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

The actual annual emission rate shall be calculated by using the actual fuel usages and emission factors and methodologies specified above.

3. Compliance with the pressure drop limitation in term A.II.1. shall be demonstrated by the recordkeeping in term A.III.3.
4. Compliance with the fuel type limitation in term A.II.2. shall be demonstrated by the recordkeeping in term A.III.1.

VI. Miscellaneous Requirements

1. The following is a summary of the netting emissions in tons per year (TPY):

Formica Corporation
Netting Summary Table
Pollutant NOx

Date*	Action (PTI, etc.)	Source/Unit	Emissions Change (tpy)		
			Increase	Decrease	
7/23/97	14-4281	K013 - Treater #99	2.8		
6/10/98	14-4511	K014 - Treater #109	9.95		

Formica Corporation
PTI Application: 14-05711
Issue

Facility ID: 1431154026

Emissions Unit ID: B004

10/14/99	14-4755	B001-B003 (Boilers 1-3) (1431154026)	87.2		
11/24/99	14-4800	B004 (Wood Waste Boiler)	75.9		
5/01/00	Existing Shut Down Emissions Units	B001 - B005 (Boilers 1-5) (1431150801)		150.24	
			Increase Total	Decrease Total	Net Total
			175.85	150.24	+25.61

Formica Corporation
 Netting Summary Table
 Pollutant CO

Date*	Action (PTI, etc.)	Source/Unit	Emissions Change (tpy)		
			Increase	Decrease	
7/23/97	14-4281	K013 - Treater #99	0.6		
6/10/98	14-4511	K014 - Treater #109	2.46		
10/14/99	14-4755	B001-B003 (Boilers 1-3) (1431154026)	96.6		
11/24/99	14-4800	B004 (Wood Waste Boiler)	37.7		
5/01/00	Existing Shut Down Emissions Units	B001 - B005 (Boilers 1-5) (1431150801)		81.0	
			Increase Total	Decrease Total	Net Total
			137.36	81.0	+56.36

Formi
PTI A

Emissions Unit ID: B004

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Formica Corporation
Netting Summary Table
Pollutant PM10

Date*	Action (PTI, etc.)	Source/Unit	Emissions Change (tpy)		
			Increase	Decrease	
7/23/97	14-4281	K013 - Treater #99	0.33		
6/10/98	14-4511	K014 - Treater #109	0.99		
10/14/99	14-4755	B001-B003 (Boilers 1-3) (1431154026)	5.38		
11/24/99	14-4800	B004 (Wood Waste Boiler)	12.57		
5/01/00	Existing Shut Down Emissions Units	B001 - B005 (Boilers 1-5) (1431150801)****		6.0	
			Increase Total	Decrease Total	Net Total
			19.27	6.0	+13.27

* Listed chronologically from oldest to most recent change. The contemporaneous time frame extends back five years from planned construction date.

** Affected units are those at the facility that will experience an increase in usage/production due to this project, and therefore will experience an increase in actual emissions past operation (one example would be "debottlenecking").

*** All shut downs/decreases must be federally enforceable.

**** Includes coal, ash, and material handling for the coal boilers

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2. The terms and conditions of this permit to install shall supersede the terms and conditions of permit to install number 14-04800 as issued June 20, 2002.
3. Emissions units 1431150801 B001, 1431150801 B002, 1431150801 B003, 1431150801 B004, and 1431150801 B005 shall be permanently shut down upon the start-up of emissions units 1431154026 B001, 1431154026 B002, 1431154026 B003, and 1431154026 B004.

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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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B004 - 28.7 MMBTU/hr Wood waste-fired boiler with multiclone and fabric filter baghouse		

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- 1. The permit to install for emissions unit B004 was evaluated based on the actual materials(typically coatings and cleanup 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(or other Ohio EPA approved 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 (HCl)

Formica Corporation
PTI Application: 14-05711
Issue

Facility ID: 1431154026

Emissions Unit ID: B004

TLV (ug/m3): 2200

Total Maximum Hourly Emission Rate (lbs/hr): 0.545

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Predicted 1 Hour Maximum Ground-Level Concentration at the Fence line (ug/m3): 2.6

Maximum Acceptable Ground-Level Concentration (MAGLC) (ug/m3): 52.4

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;
- 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.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, 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:"

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- 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