



John R. Kasich, Governor
 Mary Taylor, Lt. Governor
 Craig W. Butler, Director

7/17/2015

Certified Mail

Diane Berniquer
 Formica Corporation - Evendale
 10155 Reading Road
 Cincinnati, OH 45241

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
 Facility ID: 1431150801
 Permit Number: P0119135
 Permit Type: Administrative Modification
 County: Hamilton

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

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
 77 South High Street, 17th Floor
 Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA
SWOAQA; Indiana; Kentucky



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Formica Corporation - Evendale**

Facility ID:	1431150801
Permit Number:	P0119135
Permit Type:	Administrative Modification
Issued:	7/17/2015
Effective:	7/17/2015



Division of Air Pollution Control
Permit-to-Install
for
Formica Corporation - Evendale

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Final Permit-to-Install
Formica Corporation - Evendale
Permit Number: P0119135
Facility ID: 1431150801
Effective Date: 7/17/2015

Authorization

Facility ID: 1431150801
Facility Description: Laminate Sheet Manufacturer
Application Number(s): M0003427
Permit Number: P0119135
Permit Description: Agency-initiated administrative modification of PTI 14-05714 to change emissions unit ID and facility PN to update owner/operator of source as Formica Corporation. Formica acquired source in 2004 in agreement with Duke Energy. EU ID changed to B011 to avoid duplication with shutdown Formica source B004.
Permit Type: Administrative Modification
Permit Fee: \$0.00
Issue Date: 7/17/2015
Effective Date: 7/17/2015

This document constitutes issuance to:

Formica Corporation - Evendale
10155 Reading Rd.
Cincinnati, OH 45241

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

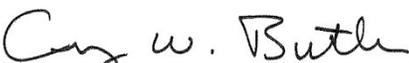
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Final Permit-to-Install
Formica Corporation - Evendale
Permit Number: P0119135
Facility ID: 1431150801
Effective Date: 7/17/2015

Authorization (continued)

Permit Number: P0119135
Permit Description: Agency-initiated administrative modification of PTI 14-05714 to change emissions unit ID and facility PN to update owner/operator of source as Formica Corporation. Formica acquired source in 2004 in agreement with Duke Energy. EU ID changed to B011 to avoid duplication with shutdown Formica source B004.

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

Emissions Unit ID:	B011
Company Equipment ID:	Boiler DSI-4
Superseded Permit Number:	14-05714
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Formica Corporation - Evendale
Permit Number: P0119135
Facility ID: 1431150801
Effective Date: 7/17/2015

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

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

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Southwest Ohio Air Quality Agency.

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

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

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

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

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

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Southwest Ohio Air Quality Agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

10. Applicability

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

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

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

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

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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



Final Permit-to-Install
Formica Corporation - Evendale
Permit Number: P0119135
Facility ID: 1431150801
Effective Date: 7/17/2015

B. Facility-Wide Terms and Conditions



Final Permit-to-Install
Formica Corporation - Evendale
Permit Number: P0119135
Facility ID: 1431150801
Effective Date: 7/17/2015

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.



Final Permit-to-Install
Formica Corporation - Evendale
Permit Number: P0119135
Facility ID: 1431150801
Effective Date: 7/17/2015

C. Emissions Unit Terms and Conditions

1. B011, Boiler DSI-4

Operations, Property and/or Equipment Description:

28.7 MMBtu/hr wood waste-fired boiler #4 with multiclone and baghouse (previously B004 in PTIs 14-4800 and 14-05714 under PN 1431154026)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	<p>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.*</p> <p>Sulfur dioxide (SO2) emissions shall not exceed 0.01 lb SO2/MMBtu and 1.25 TPY.*</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.30 lb CO/MMBtu and 37.7 TPY.*</p> <p>Nitrogen oxide (NOx) emissions shall not exceed 0.604 lb NOx/MMBtu and 75.9 TPY NOx.*</p> <p>Volatile organic compound (VOC) emissions shall not exceed 0.039 lb VOC/MMBtu and 4.9 TPY VOC.*</p> <p>The PE limitations established pursuant to OAC rule 3745-31-05(A)(3) when combusting wood waste are less stringent than the emission limitations established pursuant to 40 CFR Part 63, subpart DDDDD. The permittee shall comply with</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>all applicable emission limitations (including any less stringent emission limitation) after the compliance date in 40 CFR Part 63, Subpart DDDDD.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and 40 CFR Part 60 Subpart Dc.</p> <p>See b)(2)(a), c)(1), and c)(2).</p> <p>*The lb/MMBtu and ton per year emission limitations are based upon the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these emission limits.</p>
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% as a 6-minute average, except as specified by rule.
c.	OAC rule 3745-17-10(C)	The PE limitation specified in OAC rule 3745-17-10(C) is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
d.	40 CFR Part 60, Subpart Dc	<p>The SO₂, PE, and visible emission limitations specified in 40 CFR Part 60, Subpart Dc do not apply because this emissions unit has a maximum rated heat input capacity of less than 30 MMBtu/hr and is restricted to burning only wood.</p> <p>See b)(2)c.</p>
e.	40 CFR Part 63, Subpart DDDDD	<p>Applicable Emission Limits in Table 1; and Operating Limits in Table 2 to Subpart DDDDD of 40 CFR Part 63.</p> <p>Pursuant to 40 CFR 63.7495(b), the permittee shall comply with this subpart no later than January 31, 2016, except as provided in 63.6(i).</p>

- (2) Additional Terms and Conditions
- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emissions limitations and the use of a baghouse and multiclone.
 - b. The emissions from emissions unit B011 shall be vented to a multiclone and baghouse in series.
 - c. 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.
- c) 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 emissions unit.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain an annual record which summarizes the daily records for the quantity of wood waste burned in this emissions unit.
 - (2) The permittee shall maintain daily records of the type of fuel and the quantity of fuel, including wood waste, burned in this emissions unit.
 - (3) The permittee shall maintain daily records listing days when a fuel other than wood waste was burned. For each day during which the permittee burns a fuel other than wood waste, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
 - (4) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;

- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date corrective action was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the pressure drop readings immediately after the corrective action was implemented; and
- k. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

- (5) The permit to install for this emissions unit (B011) 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 (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 Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hydrogen Chloride

TLV (mg/m³): 2200

Maximum Hourly Emission Rate (lbs/hr): .545

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 2.6

MAGLC (ug/m³): 52.4

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic 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 applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used 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.).
- (6) 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 still 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. where 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.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;
 - b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;
 - c. each incident of deviation described in "a." (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a." where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a." where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

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

- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than wood waste was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (4) The permittee shall submit annual reports which specify the total IPE, PM₁₀, SO₂, NO_x, CO, and VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 30 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in a) of these terms and conditions shall be determined in accordance with the following method(s):



a. Emission Limitations:

0.10 lb of PE/PM10/MMBtu of actual heat input; and

12.57 TPY of PE/PM10.

Applicable compliance method for PE/PM10:

Compliance may be determined by multiplying the actual particulate emission rate (as determined by the latest emission 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. See f)(1)(f) for additional testing requirements for PE/PM10.

Compliance with the annual emission limitation shall be calculated by multiplying the actual particulate emission rate (lb/mmBTU, as determined by the latest emission test) by the heat input capacity of the emissions unit (mmBtu/hr) and by the actual hours of operation per year, and dividing by 2000 lbs/ton.

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.

b. Emission Limitations:

0.604 lb of NOx/MMBtu of actual heat input; and

75.9 TPY of NOx.

Applicable compliance method for NOx:

Compliance may be determined by multiplying the actual NOx emission rate (as determined by the latest emission 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.

Compliance with the annual emission limitation shall be calculated by multiplying the actual NOx emission rate (lb/mmBTU, as determined by the latest emission test) by the heat input capacity of the emissions unit (MMBtu/hr) and by the actual hours of operation per year, and dividing by 2000 lbs/ton.

If required, compliance with the allowable mass emission rate for NOx shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

c. Emission Limitations:

0.30 lb of CO/MMBtu of actual heat input; and



37.7 TPY of CO.

Applicable compliance method for CO:

Compliance may be determined by multiplying the actual CO emission rate (as determined by the latest emission 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.

Compliance with the annual emission limitation shall be calculated by multiplying the actual particulate emission rate (lb/MMBTU, as determined by the latest emission test) by the heat input capacity of the emissions unit (MMBTU/hr) and by the actual hours of operation per year, and dividing by 2000 lbs/ton.

If required, compliance with the allowable mass emission rate for CO shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

d. Emission Limitations:

0.01 lb of SO₂/MMBTU of actual heat input; and

1.25 TPY of SO₂.

Applicable compliance method for SO₂:

Compliance with the lb/MMBTU emission limitation may be based on the manufacturer's guaranteed emission factor of 0.01 lb of SO₂/MMBTU of actual heat input as specified in permit to install application 14-05714. If required, compliance with the lb/MMBTU emission limitation for SO₂ shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

Compliance with the annual emission limitation shall be calculated by multiplying the emission factor of 0.01 lb of SO₂/MMBTU of actual heat input by the heat input capacity of the emissions unit (MMBTU/hr) and by the actual hours of operation per year, and dividing by 2000 lbs/ton.

e. Emission Limitations:

0.039 lb of VOC/MMBTU of actual heat input; and

4.9 TPY of VOC.

Applicable compliance method for VOC:

Compliance with the lb/MMBTU emission limitation may be demonstrated using the emission factor from Table 1.6-1 in Compilation of Emissions Factor, AP-42, September 2003 of 0.039 lb VOC/MMBTU of actual heat input.



Compliance with the annual emission limitation shall be calculated by multiplying the emission factor of 0.039 lb VOC/MMBtu of actual heat input by the derated heat input capacity of the emissions unit (MMBtu/hr) and by the actual hours of operation per year, and dividing by 2000 lbs/ton.

If required, compliance with the lb/MMBtu emission limitation for VOC shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

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

The emission testing shall be conducted within 6 months after the issuance of this permit.

The emission testing shall be conducted to demonstrate compliance with the lb/MMBtu emission limitations for PE/PM10.

The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for PE/PM10, 40 CFR Part 60, Appendix A, Methods 1 through 4 and 5. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

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 tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission tests.

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.

A comprehensive written report on the results of the emissions tests 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 tests. 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.

- g. Emission Limitation:



Visible particulate emissions shall not exceed 20% as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

- (2) Compliance with the pressure drop limitation in c(1) shall be demonstrated by the record keeping in d(4). Compliance with the fuel type limitation in c(2) shall be demonstrated by the record keeping in d(2).

g) 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		
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(Boilers1-3) (1431154026)	96.6		
11/24/99	14-4800	B004(WoodWaste Boiler)	37.7		
5/01/00	Existing Shut Down Emissions Units	B001-B005(Boilers1-5) (1431150801)		81.0	

			Increase Total	Decrease Total	Net Total
			137.36	81.0	+56.36

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(Boilers1-3) (1431154026)	5.38		



Date*	Action(PTI,etc.)	Source/Unit	EmissionsChange(tpy)		
			Increase	Decrease	
11/24/99	14-4800	B004(WoodWaste Boiler)	12.57		
5/01/00	ExistingShutDownEmissionsUnits	B001-B005(Boilers1-5) (1431150801)****		6.0	
			Increase Total	Decrease Total	NetTotal
			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 shutdowns/decreases must be federally enforceable.

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