



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

8/7/2015

Certified Mail

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 1431150801
 Permit Number: P0119134
 Permit Type: Administrative Modification
 County: Hamilton

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	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:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Cincinnati Enquirer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically 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. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
 Permit Review/Development Section
 Ohio EPA, DAPC
 50 West Town Street, Suite 700
 P.O. Box 1049
 Columbus, Ohio 43216-1049

and Southwest Ohio Air Quality Agency
 250 William Howard Taft Rd.
 Cincinnati, OH 45219

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification
 SWOQA; Indiana; Kentucky

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install Administrative Modification Formica Corporation - Evendale

10155 Reading Rd., Cincinnati, OH 45241

ID#:P0119134

Date of Action: 8/7/2015

Permit Desc: Agency-initiated administrative modification of PTI 14-04755 to change emissions units ID and facility PN to update owner/operator of sources as Formica Corporation. Formica acquired sources in 2004 in agreement with Duke Energy. EU IDs changed to B008-B010 to avoid duplication with shutdown Formica sources B001-B003..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Bonnie Pray, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777

Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

This permitting action is an Administrative Modification to PTI 14-04755, initiated by SWOQA to change the premise number from Duke Energy 1431154026 to Formica Corporation 1431150801 and to change emissions unit IDs from B001, B002 and B003 to B008, B009 and B010.

3. Facility Emissions and Attainment Status:

Formica Corporation is a major Title V facility located in Hamilton County. Hamilton County is in attainment for all criteria pollutants except ozone and PM2.5.

4. Source Emissions:

B008, B009 and B010 are all 73.5 mmBtu/hr natural gas and No. 2 fuel oil fired boilers. PTI 14-04755 establishes Synthetic Minor limits for SO₂ emissions of 38.7 tons per year by limiting fuel oil usage to 1,790,000 gallons per year, based on a rolling, 12-month summation of the No. 2 fuel oil usage. NO_x emissions are limited to 66.2 tons per year, based on a rolling, 12-month summation of the monthly NO_x emissions. Since the AP-42 emission factors used in PTI 14-04755 have changed, emissions were re-calculated using revised AP-42 emission factors, and the allowable emission limits revised accordingly.

5. Conclusion:

This permit must be issued in Draft in order to retain Federal enforceability.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
<u>PE/PM10</u>	<u>9.1</u>
<u>SO₂</u>	<u>38.7</u>
<u>NO_x</u>	<u>66.2</u>
<u>CO</u>	<u>85.6</u>
<u>VOC</u>	<u>5.5</u>



DRAFT

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

Facility ID:	1431150801
Permit Number:	P0119134
Permit Type:	Administrative Modification
Issued:	8/7/2015
Effective:	To be entered upon final issuance



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

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Draft Permit-to-Install
Formica Corporation - Evendale
Permit Number: P0119134
Facility ID: 1431150801
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1431150801
Facility Description: Laminate Sheet Manufacturer
Application Number(s): M0003426
Permit Number: P0119134
Permit Description: Agency-initiated administrative modification of PTI 14-04755 to change emissions units ID and facility PN to update owner/operator of sources as Formica Corporation. Formica acquired sources in 2004 in agreement with Duke Energy. EU IDs changed to B008-B010 to avoid duplication with shutdown Formica sources B001-B003.
Permit Type: Administrative Modification
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 8/7/2015
Effective Date: To be entered upon final issuance

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



Authorization (continued)

Permit Number: P0119134
 Permit Description: Agency-initiated administrative modification of PTI 14-04755 to change emissions units ID and facility PN to update owner/operator of sources as Formica Corporation. Formica acquired sources in 2004 in agreement with Duke Energy. EU IDs changed to B008-B010 to avoid duplication with shutdown Formica sources B001-B003.

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

Group Name: Boilers

Emissions Unit ID:	B008
Company Equipment ID:	Boiler DSI-1
Superseded Permit Number:	14-4755
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B009
Company Equipment ID:	Boiler DSI-2
Superseded Permit Number:	14-4755
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B010
Company Equipment ID:	Boiler DSI-3
Superseded Permit Number:	14-4755
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
Formica Corporation - Evendale
Permit Number: P0119134
Facility ID: 1431150801
Effective Date: To be entered upon final issuance

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 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



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Formica Corporation - Evendale
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any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install
Formica Corporation - Evendale
Permit Number: P0119134
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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.



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C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Boilers: B008, B009, B010

EU ID	Operations, Property and/or Equipment Description
B008	73.5 MMBtu/hr natural gas and No. 2 fuel oil-fired boiler #1 (previously B001 in PTI 14-4755 under PN 1431154026)
B009	73.5 MMBtu/hr natural gas and No. 2 fuel oil-fired boiler #2 (previously B002 in PTI 14-4755 under PN 1431154026)
B010	73.5 MMBtu/hr natural gas and No. 2 fuel oil-fired boiler #3 (previously B003 in PTI 14-4755 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>When burning natural gas, emissions shall not exceed the following:</p> <p>0.008 lb particulate emissions (PE) per million Btu actual heat input;</p> <p>0.008 particulate matter less than 10 microns in diameter (PM10) per million Btu actual heat input;</p> <p>0.0006 lb sulfur dioxide (SO₂) per million Btu actual heat input;</p> <p>0.05 lb nitrogen oxides (NO_x) per million Btu actual heat input;</p> <p>0.08 lb carbon monoxide (CO) per million Btu actual heat input; and</p> <p>0.005 lb organic compounds (OC) per million Btu actual heat input.</p> <p>When burning No. 2 fuel oil, emissions shall not exceed the following:</p> <p>0.328 lb SO₂ per million Btu actual heat input;</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>0.15 lb NOx per million Btu actual heat input;</p> <p>0.04 lb CO per million Btu actual heat input; and</p> <p>0.002 lb organic compounds (OC) per million Btu actual heat input.</p> <p>Emissions from emissions units B008, B009 and B010 combined shall not exceed the following, based on a rolling, 12-month summation of the monthly emissions.</p> <p>9.1 tons per year (TPY) PE; 9.1 TPY PM10; 85.6 TPY CO; and 5.5 TPY VOC.</p> <p>See c)(2).</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10(B)(1), 3745-31-05(D), and 40 CFR Part 60, Subpart Dc.</p>
b.	OAC rule 3745-17-07(A)	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to 40 CFR Part 60, Subpart Dc.
c.	OAC rule 3745-17-10(B)(1)	PE emissions shall not exceed 0.020 lb per million Btu actual heat input when burning No. 2 fuel oil.
d.	OAC rule 3745-18-06	The emission limitations specified by this rule are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-31-05(D) Synthetic Minor to avoid PSD review	<p>SO2 emissions from emissions units B008, B009 and B010 combined shall not exceed 38.7 TPY, based on a rolling, 12-month summation of the monthly emissions.</p> <p>See c)(3) and c)(4).</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-31-05(D) Netting to avoid PSD review	NOx emissions from emissions units B008, B009 and B010 combined shall not exceed 66.2 TPY, based on a rolling, 12-month summation of the monthly emissions. See c)(2) thru c)(4).
g.	40 CFR Part 60, Subpart Dc	Visible emissions from shall not exceed 20% opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity. See d)(3), d)(4) and e)(3).

(2) Additional Terms and Conditions

- a. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency (U.S. EPA), 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 quality of the oil burned in this emissions unit shall meet the following specifications on an "as received" basis:
 - a. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.306 pound of sulfur dioxide/mmBtu actual heat input; and
 - b. greater than 130,000 Btu/gallon of oil.

Compliance with the above-mentioned specifications shall be determined by using the analytical results provided by the permittee or oil supplier for each shipment of oil.

- (2) The permittee shall install, operate and maintain low-NOx burners at all times when operating emissions units B001, B002, and B003.
- (3) The maximum annual No. 2 fuel oil usage for emissions units B001, B002 and B003 combined shall not exceed 1,790,000 gallons per year based upon a rolling, 12-month summation of the No. 2 fuel oil usage figures. Emissions units B001, B002, and B003 are existing emissions units and therefore have adequate records of No. 2 fuel oil usage such that B001 thru B003 do not have to be restricted on a monthly No. 2 fuel oil usage basis.

(4) The permittee shall only burn natural gas and/or No. 2 fuel oil in B001 thru B003.

d) Monitoring and/or Recordkeeping Requirements

(1) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the fuel oil type (number 2, 4, or 6), the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

(2) The permittee shall maintain monthly records of the following information:

- a. the total No. 2 fuel oil usage rate for each month;
- b. the rolling, 12-month summation of the No. 2 Fuel oil usage (the summation of d)(2)a. for the current month's total and previous 11-months totals); and
- c. the rolling, 12-month emissions of PE, PM10, SO2, NOx, CO and VOC.

(3) For steam generating units with a heat input capacity ≥ 30 MMBtu/hour, where meeting the requirements (one of the options) of 40 CFR 60.47c(c), (d), (e), or (f), Method 9 of Appendix A of Part 60 may be used in accordance with the procedures in 40 CFR 60.11, to demonstrate compliance with the opacity standard. The following records shall be maintained for visible emissions readings:

- a. the dates and time intervals of all opacity observation periods;
- b. the name, affiliation, and copy of current visible emission reading certification for each visible emission observer participating in the performance test; and
- c. copies of all visible emission observer opacity field data sheets.

(4) If meeting the requirements of 40 CFR 60.47c(c), (d), (e), or (f), the permittee may conduct performance tests using Method 9 of Appendix A to Part 60 and the procedures in 40 CFR 60.11. The following schedule shall be followed for visible emission observations, as determined by the most recent Method 9 performance test results:

- a. If no visible emissions are observed, a subsequent Method 9 performance test must be completed within 12 calendar months from the date that the most

recent performance test was conducted or within 45 days of the next day that fuel with an opacity standard is combusted, whichever is later;

- b. If visible emissions are observed but the maximum 6-minute average opacity is less than or equal to 5%, a subsequent Method 9 performance test must be completed within 6 calendar months from the date that the most recent performance test was conducted or within 45 days of the next day that fuel with an opacity standard is combusted, whichever is later;
- c. If the maximum 6-minute average opacity is greater than 5% but less than or equal to 10%, a subsequent Method 9 performance test must be completed within 3 calendar months from the date that the most recent performance test was conducted or within 45 days of the next day that fuel with an opacity standard is combusted, whichever is later; or
- d. If the maximum 6-minute average opacity is greater than 10%, a subsequent Method 9 performance test must be completed within 45 calendar days from the date that the most recent performance test was conducted.

If during the initial 60 minutes of the observation all the 6-minute averages are less than 10% opacity and all the individual 15-second observations are less than or equal to 20%, then the observation period may be reduced from 3 hours to 60 minutes.

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. any exceedance of the emission limitations specified in b)(1)a., b)(1)c., b)(1)e., b)(1)f.;
 - b. any exceedance of the No. 2 fuel oil usage limitation in c)(3);
 - c. any deviation from No. 2 fuel oil sulfur content limitation or the minimum Btu/gallon heat content limitation of the fuel oil; and
 - d. Any exceedance of the fuel restriction in c)(4).

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

- (3) Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
 - a. construction date (no later than 30 days after such date);



- b. actual start-up date (within 15 days after such date), including a description of each affected emissions unit, equipment manufacturer, and serial number of the equipment if available; and
- c. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Southwest Ohio Air Quality Agency
250 William Howard Taft Road
Cincinnati, Ohio 45219

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

0.008 lb PE/PM10 per million Btu actual heat input when burning natural gas;
0.020 lb PE per million Btu actual heat input when burning No. 2 fuel oil; and
9.1 TPY PE/PM10, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method when burning natural gas:

Compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu.ft/hr.) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 7.6 lbs of PE/mm cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (mm Btu/hr).

Applicable Compliance Method when burning No. 2 fuel oil

Compliance may be determined by multiplying the maximum hourly No. 2 fuel oil burning capacity of the emissions unit (gallons/hr.) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 5/10) emission factor of 2 lbs. of PE/PM10/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (mm Btu/hr).

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitations in accordance with USEPA reference Method 1-5 of 40 CFR, Part 60, Appendix A.

Compliance with the rolling, 12-month limit shall be determined by the record keeping requirements specified in d)(2).

b. Emission Limitations:

0.0006 lb SO₂ per million Btu actual heat input when burning natural gas;
0.328 lb SO₂ per million Btu actual heat input when burning No. 2 fuel oil; and
38.7 TPY, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method when burning natural gas:

Compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu.ft/hr.) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 0.6 lbs of SO₂/mm cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (mm Btu/hr).

Applicable Compliance Method when burning No. 2 fuel oil:

Compliance may be determined by multiplying the maximum hourly No. 2 fuel oil burning capacity of the emissions unit (gallons/hr.) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 5/10) emission factor of 42.60 lbs. of SO₂/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (mm Btu/hr).

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitations in accordance with USEPA reference Method 6, Method 6A, Method 6B, or Method 6C, whichever is appropriate, of 40 CFR, Part 60, Appendix A.

Compliance with the rolling, 12-month limit shall be determined by the record keeping requirements specified in d)(2).

c. Emission Limitations:

0.05 lb NO_x per million Btu actual heat input when burning natural gas;
0.15 lb NO_x per million Btu actual heat input when burning No. 2 fuel oil; and
66.2 TPY, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method when burning natural gas:

Compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu.ft/hr.) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emission factor of 50 lbs of NO_x/mm cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (mm Btu/hr).

Applicable Compliance Method when burning No. 2 fuel oil

Compliance may be determined by multiplying the maximum hourly No. 2 fuel oil burning capacity of the emissions unit (gallons/hr.) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 5/10) emission factor of 20 lbs. of NO_x/1000



gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (mm Btu/hr).

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

Compliance with the rolling, 12-month limit shall be determined by the record keeping requirements specified in d)(2).

d. Emission Limitations:

0.08 lb CO per million Btu actual heat input when burning natural gas;
0.04 lb CO per million Btu actual heat input when burning No. 2 fuel oil; and
85.6 TPY, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method when burning natural gas:

Compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu.ft/hr.) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emission factor of 84 lbs of CO/mm cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (mm Btu/hr).

Applicable Compliance Method when burning No. 2 fuel oil

Compliance may be determined by multiplying the maximum hourly No. 2 fuel oil burning capacity of the emissions unit (gallons/hr.) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 5/10) emission factor of 5 lbs. of CO/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (mm Btu/hr).

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 through 4 and 10.

Compliance with the rolling, 12-month limit shall be determined by the record keeping requirements specified in d)(2).

e. Emission Limitations:

0.005 lb OC per million Btu actual heat input when burning natural gas;
0.002 lb OC per million Btu actual heat input when burning No. 2 fuel oil; and
5.5 TPY, based on a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method when burning natural gas:

Compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu.ft/hr.) by the AP-42, Fifth Edition, Section



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1.4, Table 1.4-2 (revised 7/98) emission factor of 5.5 lbs of VOC/mm cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (mm Btu/hr).

Applicable Compliance Method when burning No. 2 fuel oil

Compliance may be determined by multiplying the maximum hourly No. 2 fuel oil burning capacity of the emissions unit (gallons/hr.) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-3 (revised 5/10) emission factor of 0.252 lbs. of VOC/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (mm Btu/hr).

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

Compliance with the rolling, 12-month limit shall be determined by the record keeping requirements specified in d)(2).

f. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except for one 6-minute period per hour of not more than 27 percent opacity.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the opacity standard in accordance with 40 CFR 60.48b(a), as identified in the Monitoring and Recordkeeping section of this permit.

(2) Compliance with the No. 2 fuel oil sulfur content limitation and the minimum Btu/gallon fuel oil requirements in c)(1) shall be demonstrated by the recordkeeping specified in d)(2).

(3) Compliance with the rolling, 12-month No. 2 fuel oil usage limitation in c)(3) shall be demonstrated by the recordkeeping specified in d)(2).

g) Miscellaneous Requirements

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

Emissions Unit	Pollutant	Decrease	Increase
B001 – B003 (1431154026*)	NOx		+87.2
B001 – B003 (1431150801**)	NOx	-136.0***	



Draft Permit-to-Install
Formica Corporation - Evendale
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Emissions Unit	Pollutant	Decrease	Increase
K013 (1431130801**) (PTI 14-4281) PTI issued 7/23/97	NOx		+2.8
K014 (1431150801**) (PTI 14-4511) PTI issued 6/10/98	NOx		+9.95
Net Emissions Change			-36.05

- * OEPA Premise Permit to Operate number
- ** OEPA Premise Permit to Operate number
- *** Based on average actual emissions for 1997 and 1998.