



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

8/23/2016

Certified Mail

Matteo Ciabattari
 Sofidel America
 5085 Reed Rd.
 Columbus, OH 43220

Yes	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
Yes	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0165010410
 Permit Number: P0120583
 Permit Type: Initial Installation
 County: Pickaway

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. 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**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

The issuance of this PTIO 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.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 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: Ohio EPA-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Sofidel America**

Facility ID:	0165010410
Permit Number:	P0120583
Permit Type:	Initial Installation
Issued:	8/23/2016
Effective:	8/23/2016
Expiration:	8/23/2026



**Division of Air Pollution Control
Permit-to-Install and Operate**

for
Sofidel America

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Final Permit-to-Install and Operate
Sofidel America
Permit Number: P0120583
Facility ID: 0165010410
Effective Date: 8/23/2016

Authorization

Facility ID: 0165010410
Application Number(s): A0055619
Permit Number: P0120583
Permit Description: Initial installation permit for a paper product manufacturing facility
Permit Type: Initial Installation
Permit Fee: \$14,450.00
Issue Date: 8/23/2016
Effective Date: 8/23/2016
Expiration Date: 8/23/2026
Permit Evaluation Report (PER) Annual Date: Oct 1 - Sept 30, Due Nov 15

This document constitutes issuance to:

Sofidel America
South of US Rte 23 and Pittsburg Rd
Circleville, OH 43113

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

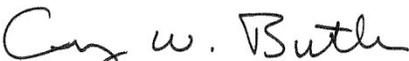
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0120583

Permit Description: Initial installation permit for a paper product manufacturing facility

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

Emissions Unit ID: F001
 Company Equipment ID: Paved Roadways
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P009
 Company Equipment ID: Rewinder
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P010
 Company Equipment ID: Dust pelletizer
 Superseded Permit Number:
 General Permit Category and Type: Not Applicable

Group Name: Auxiliary Boilers

Emissions Unit ID:	B001
Company Equipment ID:	Auxiliary Boiler 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B002
Company Equipment ID:	Auxiliary Boiler 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Combustion Turbines

Emissions Unit ID:	P001
Company Equipment ID:	PM 1 Gas Turbine
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P011
Company Equipment ID:	PM 2 Gas Turbine
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Converting Lines

Emissions Unit ID:	P019
Company Equipment ID:	Converting Line 1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P020
Company Equipment ID:	Converting Line 2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Emissions Unit ID:	P021
Company Equipment ID:	Converting Line 3
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P022
Company Equipment ID:	Converting Line 4
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P023
Company Equipment ID:	Converting Line 5
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P024
Company Equipment ID:	Converting Line 6
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P025
Company Equipment ID:	Converting Line 7
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P026
Company Equipment ID:	Converting Line 8
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P027
Company Equipment ID:	Converting Line 9
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P028
Company Equipment ID:	Converting Line 10
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P029
Company Equipment ID:	Converting Line 11
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P030
Company Equipment ID:	Converting Line 12
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Group Name: Dry Ends

Emissions Unit ID:	P007
Company Equipment ID:	PM 1 Dry End
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P017
Company Equipment ID:	PM 2 Dry End
Superseded Permit Number:	
General Permit Category andType:	Not Applicable



Group Name: Duct Burners

Emissions Unit ID:	P002
Company Equipment ID:	PM 1 Duct burner/HRSG
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P012
Company Equipment ID:	PM 2 Duct burner/HRSG
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Group Name: Hood Burners

Emissions Unit ID:	P003
Company Equipment ID:	PM 1 Hood Burner 1
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	PM 1 Hood Burner 2
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P013
Company Equipment ID:	PM 2 Hood Burner 1
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P014
Company Equipment ID:	PM 2 Hood Burner 2
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Group Name: Pulp & Paper Machine Additives

Emissions Unit ID:	P008
Company Equipment ID:	PM 1 VOC
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P018
Company Equipment ID:	PM 2 VOC
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Group Name: Space Heating Boilers

Emissions Unit ID:	B003
Company Equipment ID:	Space Heating Boiler 1
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	B004
Company Equipment ID:	Space Heating Boiler 2
Superseded Permit Number:	
General Permit Category andType:	Not Applicable



Final Permit-to-Install and Operate
Sofidel America
Permit Number: P0120583
Facility ID: 0165010410
Effective Date: 8/23/2016

Group Name: Wet Ends

Emissions Unit ID:	P005
Company Equipment ID:	PM 1 Wet End
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P015
Company Equipment ID:	PM 2 Wet End
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

Group Name: Yankee Hoods

Emissions Unit ID:	P006
Company Equipment ID:	PM 1 Yankee Hood
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P016
Company Equipment ID:	PM 2 Yankee Hood
Superseded Permit Number:	
General Permit Category andType:	Not Applicable



Final Permit-to-Install and Operate
Sofidel America
Permit Number: P0120583
Facility ID: 0165010410
Effective Date: 8/23/2016

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
Sofidel America
Permit Number: P0120583
Facility ID: 0165010410
Effective Date: 8/23/2016

B. Facility-Wide Terms and Conditions



Final Permit-to-Install and Operate

Sofidel America

Permit Number: P0120583

Facility ID: 0165010410

Effective Date: 8/23/2016

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



Final Permit-to-Install and Operate
Sofidel America
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C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Auxiliary Boilers: B001 and B002

EU ID	Operations, Property and/or Equipment Description
B001	43.94 MMBtu/hr natural gas-fired boiler
B002	43.94 MMBtu/hr natural gas-fired boiler

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)d., b)(1)e., b)(2)b., b)(2)c. and f)(1)e.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.020 lb/MMBtu of actual heat input.
c.	OAC rule 3745-31-05(A)(3) <i>June 30, 2008</i>	The emissions unit shall be designed to meet the following: 0.024 lb NO _x /MMBtu; and 0.037 lb CO/MMBtu. Volatile organic compound (VOC) emissions shall not exceed 0.087 tons per month, averaged over a 12-month rolling period from each emissions unit.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Sulfur dioxide (SO₂) emissions shall not exceed 0.02 tons per month, averaged over a 12-month rolling period from each emissions unit.</p> <p>PM₁₀ emissions shall not exceed 0.08 tons per month, averaged over a 12-month rolling period from each emissions unit.</p> <p>PM_{2.5} emissions shall not exceed 0.08 tons per month, averaged over a 12-month rolling period from each emissions unit.</p> <p>See b)(2)a. below.</p>
d.	<p>OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i></p>	<p>The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions from this air contaminant source because the potential to emit for each pollutant is less than 10 tons per year.</p> <p>See b)(2)b. below.</p>
e.	<p>OAC rule 3745-31-05(E) [State-only enforceable limitations to avoid the requirements of OAC rule 3745-110-03(A) to (G)]</p>	<p>Nitrogen oxides (NO_x) emissions shall not exceed 4.6 tons per year from each emissions unit.</p> <p>See b)(2)c. below.</p>
f.	<p>OAC rule 3745-110-03 [In accordance with OAC rule 3745-110-02(A), this emissions unit is a new small boiler.]</p>	<p>See b)(2)d. below.</p>
g.	<p>40 CFR Part 60, Subpart Dc</p>	<p>See c)(1) below.</p>
h.	<p>40 CFR Part 60, Subpart A</p>	<p>The permittee shall demonstrate compliance with the applicable requirements identified in 40 CFR Part 60, Subpart Dc in accordance with 40 CFR Part 60, Subpart A.</p>

(2) Additional Terms and Conditions

- a. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the

less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

- b. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. The annual NO_x emissions limitation was established to reflect the potential to emit for this emissions unit taking into consideration the manufacturer's specified NO_x emissions rate of 0.024 lb NO_x/MMBtu. The monitoring and recordkeeping requirements for maintaining the emissions unit in accordance with the manufacturer's recommendations, as established in the following terms and conditions, are sufficient to ensure compliance with this emissions limitation.
- d. OAC rule 3745-110-03(K)(17) exempts this emissions unit from the requirements of OAC rule 3745-110-03(A) to (G) because this permit restricts the emissions unit to 25 tons per year or less of NO_x emissions.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate and maintain the emissions unit in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s).
- (2) The permittee shall maintain documentation of the manufacturer's design specifications, recommendations, instructions, and/or operating manual(s) for the emissions unit. These documents shall be maintained at the facility and shall be made available to the Ohio EPA, Central District Office upon request.
- (3) The permittee shall maintain the following information for maintenance and repairs performed on the emissions unit:
 - a. the date of the maintenance and/or repair;
 - b. a description of the maintenance and/or repairs performed; and
 - c. the title of person(s) who performed the maintenance and/or repair.
- (4) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (5) The permittee shall maintain one of the following records:
 - a. The amount of natural gas combusted during each calendar month; or



b. The total amount of natural gas delivered for burning in this emissions unit during each calendar month.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Central District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (4) The permittee shall comply with all applicable reporting requirements established pursuant to 40 CFR Part 60, Subpart Dc, including the following sections.

60.7(a)(1)	Construction date (no later than 30 days after such date)
60.7(a)(3)	Actual start-up date (within 15 days after such date)

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. Emissions Limitation

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emissions Limitation

PE shall not exceed 0.020 lb/MMBtu of actual heat input.

Applicable Compliance Method

Compliance is based on the manufacturer's emissions factor of 0.005 lb PM/MMBtu multiplied by the AP-42, Section 1.4, Table 1.4-2 ratio of PE to PM (i.e., 1.9 PE / 7.6 PM).



If required, compliance shall be demonstrated through emissions testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

c. Emissions Limitations

The emissions unit shall be designed to meet the following:

0.024 lb NO_x/MMBtu; and
0.037 lb CO/MMBtu.

Applicable Compliance Method:

Compliance shall be determined based on documentation of the manufacturer's design specifications.

d. Emissions Limitations

VOC emissions shall not exceed 0.087 tons per month, averaged over a 12-month rolling period from each emissions unit.

SO₂ emissions shall not exceed 0.02 tons per month, averaged over a 12-month rolling period from each emissions unit.

PM₁₀ emissions shall not exceed 0.08 tons per month, averaged over a 12-month rolling period from each emissions unit.

PM_{2.5} emissions shall not exceed 0.08 tons per month, averaged over a 12-month rolling period from each emissions unit.

Applicable Compliance Method

These emissions limitations were established to reflect the potentials to emit based on the maximum capacity of the emissions unit (43.94 MMBtu/hr) and the manufacturer's specified SO₂ and PM emissions factors and the VOC emissions factor found in AP-42, Section 1.4, Table 1.4-2, as follows.

VOC: (43.94 MMBtu/hr) (0.0054 lb VOC/MMBtu) (730 hr/mo) / (2,000 lb/ton) = 0.087 ton/mo

SO₂: (43.94 MMBtu/hr) (0.001 lb SO₂/MMBtu) (730 hr/mo) / (2,000 lb/ton) = 0.02 ton/mo

PM₁₀: (43.94 MMBtu/hr) (0.005 lb PM₁₀/MMBtu) (730 hr/mo) / (2,000 lb/ton) = 0.08 ton/mo

PM_{2.5}: (43.94 MMBtu/hr) (0.005 lb PM_{2.5}/MMBtu) (730 hr/mo) / (2,000 lb/ton) = 0.08 ton/mo



Compliance is based on burning only natural gas in the emissions unit and maintaining the emissions unit in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s).

e. Emissions Limitation

NO_x emissions shall not exceed 4.6 tons per year from each emissions unit.

Applicable Compliance Method

The annual NO_x emissions limitation was established to reflect the potential to emit for each emissions unit taking into consideration the manufacturer's specified NO_x emissions rate of 0.024 lb NO_x/MMBtu as follows.

$$(43.94 \text{ MMBtu/hr}) (0.024 \text{ lb NO}_x/\text{MMBtu}) (8,760 \text{ hr/yr}) / (2,000 \text{ lb/ton}) = 4.6 \text{ ton/yr}$$

Compliance is based on burning only natural gas in the emissions unit and maintaining the emissions unit in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s).

g) Miscellaneous Requirements

- (1) None.

2. Emissions Unit Group -Space Heating Boilers: B003 and B004

EU ID	Operations, Property and/or Equipment Description
B003	10.24 MMBtu/hr natural gas-fired boiler
B004	10.24 MMBtu/hr natural gas-fired boiler

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)d. and b)(2)b.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.020 lb/MMBtu of actual heat input.
c.	OAC rule 3745-31-05(A)(3) <i>June 30, 2008</i>	The emissions unit shall be designed to meet the following: 0.029 lb NO _x /MMBtu; 0.037 lb CO/MMBtu; 0.0048 lb PM ₁₀ /MMBtu; and 0.0048 lb PM _{2.5} /MMBtu. Volatile organic compound (VOC) emissions shall not exceed 0.02 tons per

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>month, averaged over a 12-month rolling period from each emissions unit.</p> <p>Sulfur dioxide (SO₂) emissions shall not exceed 0.002 tons per month, averaged over a 12-month rolling period from each emissions unit.</p> <p>See b)(2)a. below.</p>
d.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	<p>The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions from this air contaminant source because the potential to emit for each pollutant is less than 10 tons per year.</p> <p>See b)(2)b. below.</p>
e.	OAC rule 3745-110-03	See b)(2)c. below.
f.	40 CFR Part 60, Subpart Dc	See c)(1) below.
g.	40 CFR Part 60, Subpart A	The permittee shall demonstrate compliance with the applicable requirements identified in 40 CFR Part 60, Subpart Dc in accordance with 40 CFR Part 60, Subpart A.

(2) Additional Terms and Conditions

- a. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. This emissions unit is not subject to the requirements specified in OAC rule 3745-110-03 because it is not one of the following types of new sources listed in OAC rule 3745-110-02(A)(2): a very large boiler, large boiler, mid-size boiler, small boiler, stationary combustion turbine, stationary internal combustion engine, or reheat furnace.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate and maintain the emissions unit in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s).
- (2) The permittee shall maintain documentation of the manufacturer's design specifications, recommendations, instructions, and/or operating manual(s) for the emissions unit. These documents shall be maintained at the facility and shall be made available to the Ohio EPA, Central District Office upon request.
- (3) The permittee shall maintain the following information for maintenance and repairs performed on the emissions unit:
 - a. the date of the maintenance and/or repair;
 - b. a description of the maintenance and/or repairs performed; and
 - c. the title of person(s) who performed the maintenance and/or repair.
- (4) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (5) The permittee shall maintain one of the following records:
 - a. The amount of natural gas combusted during each calendar month; or
 - b. The total amount of natural gas delivered for burning in this emissions unit during each calendar month.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Central District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (4) The permittee shall comply with all applicable reporting requirements established pursuant to 40 CFR Part 60, Subpart Dc, including the following sections.

60.7(a)(1)	Construction date (no later than 30 days after such date)
60.7(a)(3)	Actual start-up date (within 15 days after such date)

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. Emissions Limitation

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emissions Limitation

PE shall not exceed 0.020 lb/MMBtu of actual heat input.

Applicable Compliance Method

Compliance is based on the manufacturer's emissions factor of 0.0048 lb PM/MMBtu multiplied by the AP-42, Section 1.4, Table 1.4-2 ratio of PE to PM (i.e., 1.9 PE / 7.6 PM).

If required, compliance shall be demonstrated through emissions testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

c. Emissions Limitations

The emissions unit shall be designed to meet the following:

0.029 lb NO_x/MMBtu;
0.037 lb CO/MMBtu;
0.0048 lb PM₁₀/MMBtu; and
0.0048 lb PM_{2.5}/MMBtu.

Applicable Compliance Method:

Compliance shall be determined based on documentation of the manufacturer's design specifications.

d. Emissions Limitations

Volatile organic compound (VOC) emissions shall not exceed 0.02 tons per month, averaged over a 12-month rolling period from each emissions unit.



Sulfur dioxide (SO₂) emissions shall not exceed 0.002 tons per month, averaged over a 12-month rolling period from each emissions unit.

Applicable Compliance Method

These emissions limitations were established to reflect the potentials to emit based on the maximum capacity of the emissions unit (10.24 MMBtu/hr) and the emissions factor for each pollutant found in AP-42, Section 1.4, Table 1.4-2, as follows.

VOC: (10.24 MMBtu/hr) (0.0054 lb VOC/MMBtu) (730 hr/mo) / (2,000 lb/ton) = 0.02 ton/mo

SO₂: (10.24 MMBtu/hr) (0.0006 lb SO₂/MMBtu) (730 hr/mo) / (2,000 lb/ton) = 0.002 ton/mo

Compliance is based on burning only natural gas in the emissions unit and maintaining the emissions unit in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s).

g) Miscellaneous Requirements

- (1) None.

3. F001, Paved Roadways and Parking Areas

Operations, Property and/or Equipment Description:

Paved Roadways and Parking Areas

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. b)(1)b. and b)(2)g.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. 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) <i>June 30, 2008</i>	There shall be no visible particulate emissions from any paved roadway or parking area, except for one minute during any sixty-minute period. See b)(2)a. through b)(2)f. below.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions from this air contaminant source because the potential to emit for each pollutant is less than 10 tons per year. See b)(2)g. below.

(2) Additional Terms and Conditions

- a. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall treat the paved roadways and parking areas by application of chemical stabilization/dust suppressants and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- c. The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the monitoring section of this permit. Implementation of the control measures shall not be necessary for paved roadways and parking areas that are covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- d. The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.
- e. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary for the materials being transported.
- f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.
- g. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) Except as otherwise provided in this section, the permittee shall perform inspections of each of the roadway segments and parking areas in accordance with the following frequencies:

<u>paved roadways and parking areas</u>	<u>minimum inspection frequency</u>
all roads and parking areas	weekly

- (2) The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above-identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
- (3) The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection when it was determined by the permittee that it was necessary to implement the control measures; and
 - c. the dates the control measures were implemented.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Central District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

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. Emissions Limitation

There shall be no visible particulate emissions from any paved roadway or parking area, except for one minute during any sixty-minute period.

Applicable Compliance Method

If required, compliance with the visible emissions limitation listed above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary



Final Permit-to-Install and Operate

Sofidel America

Permit Number: P0120583

Facility ID: 0165010410

Effective Date: 8/23/2016

Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

g) Miscellaneous Requirements

- (1) None.

4. Emissions Unit Group -Combustion Turbines: P001 and P011

EU ID	Operations, Property and/or Equipment Description
P001	7.96 MW natural gas-fired turbine (86.3 MMBtu/hr)
P011	7.96 MW natural gas-fired turbine (86.3 MMBtu/hr)

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)e. and b)(2)b.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(4)	Particulate emissions (PE) shall not exceed 0.040 lb/MMBtu of actual heat input.
c.	OAC rule 3745-31-05(A)(3) [Best available technology for NO _x and CO]	NO _x emissions shall not exceed 15 ppm at 15 percent oxygen and 20.5 tons per year from each emissions unit. This NO _x emissions limitation excludes NO _x emissions from the heat recovery steam generator (HRSG)/duct burner (P002 or P012) and hood burners (P003 & P004 or P013 & P014) associated with each combustion turbine.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The emissions unit shall be designed to meet 0.0551 lb CO/MMBtu.
d.	OAC rule 3745-31-05(A)(3) <i>June 30, 2008</i> [Best available technology for VOC, SO ₂ , PM ₁₀ and PM _{2.5}]	The emissions unit shall be designed to meet the following: 0.0063 lb VOC/MMBtu; 0.0120 lb PM ₁₀ /MMBtu; and 0.0120 lb PM _{2.5} /MMBtu. Sulfur dioxide (SO ₂) emissions shall not exceed 0.11 tons per month, averaged over a 12-month rolling period from each emissions unit. See b)(2)a. below.
e.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC, SO ₂ , PM ₁₀ and PM _{2.5} emissions from this air contaminant source because the potential to emit for each pollutant is less than 10 tons per year. See b)(2)b. below.
f.	OAC rule 3745-110-03(E)(1)(b)(i) [In accordance with OAC rule 3745-110-02(A), this emissions unit is a new stationary combustion turbine.]	See b)(2)c. below.
g.	40 CFR Part 60, Subpart KKKK	See b)(2)d. through b)(2)f. below.
h.	40 CFR Part 60, Subpart A	The permittee shall demonstrate compliance with the applicable requirements identified in 40 CFR Part 60, Subpart KKKK in accordance with 40 CFR Part 60, Subpart A.

(2) Additional Terms and Conditions

- a. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

- c. This emissions unit is subject to New Source Performance Standard (NSPS) Subpart KKKK. As provided in OAC rule 3745-110-02(A)(2)(b), the requirements in NSPS Subpart KKKK were determined to be more stringent than the requirements in OAC Chapter 3745-110 for this emissions unit. Therefore, this emissions unit shall comply with the NSPS Subpart KKKK requirements for NO_x in lieu of the requirements of OAC rule 3745-110-03(E)(1)(b)(i) for the stationary combustion turbine.
 - d. The permittee shall comply with one of the following requirements for each emissions unit:
 - i. SO₂ emissions shall not exceed 110 nanograms per Joule (ng/J) (0.90 pounds per megawatt-hour (lb/MWh)) gross output from the combustion turbine (P001 or P011) and its associated HRSG/duct burner (P002 or P012); or
 - ii. Fuels burned in this emissions unit shall not contain total potential sulfur emissions in excess of 26 ng SO₂/J (0.060 lb SO₂/MMBtu) heat input.
 - e. Combined NO_x emissions from the combustion turbine (P001 or P011) and its associated HRSG/duct burner (P002 or P012) shall not exceed 25 ppm at 15 percent oxygen or 150 ng/J of useful output (1.2 lb/MWh).
 - f. The permittee shall operate and maintain the stationary combustion turbine in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.
- c) Operational Restrictions
- (1) The permittee shall burn only natural gas in this emissions unit.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall properly install, operate and maintain the emissions unit in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s).
 - (2) The permittee shall maintain documentation of the manufacturer's design specifications, recommendations, instructions, and/or operating manual(s) for the emissions unit. These documents shall be maintained at the facility and shall be made available to the Ohio EPA, Central District Office upon request.
 - (3) The permittee shall maintain the following information for maintenance and repairs performed on the emissions unit:
 - a. the date of the maintenance and/or repair;
 - b. a description of the maintenance and/or repairs performed; and
 - c. the title of person(s) who performed the maintenance and/or repair.

- (4) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (5) If the permittee chooses to comply with the SO₂ emissions limitation specified in b)(2)d.ii., a current, valid purchase contract, tariff sheet or transportation contract for the natural gas burned in this emissions unit, shall specify that the total sulfur content is 20 grains of sulfur or less per 100 standard cubic feet and has potential sulfur emissions of less than 26 ng SO₂/J (0.060 lb SO₂/MMBtu) heat input.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Central District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (4) The permittee shall comply with all applicable reporting requirements established pursuant to 40 CFR Part 60, Subpart KKKK, including the following sections.

60.7(a)(1)	Construction date (no later than 30 days after such date)
60.7(a)(3)	Actual start-up date (within 15 days after such date)

f) Testing Requirements

- (1) The permittee shall conduct emissions testing for this emissions unit in accordance with 40 CFR 60.8, 60.4340(a), 60.4400 and 60.4415 and the following requirements:
 - a. The initial emissions testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit. Subsequent emissions testing shall be conducted on an annual basis (no more than 14 calendar months following the previous emissions test).
 - b. The initial emissions testing shall be conducted to demonstrate compliance with the SO₂ emissions limitation established pursuant to 40 CFR Part 60, Subpart KKKK and the NO_x emissions limitations established pursuant to OAC rule 3745-31-05(A)(3) and 40 CFR Part 60, Subpart KKKK. The subsequent annual emissions testing shall be conducted to demonstrate compliance with the SO₂ and NO_x emissions limitations established pursuant to 40 CFR Part 60, Subpart KKKK. Pursuant to 40 CFR 60.4365, the permittee shall be exempt from the

initial and annual SO₂ emissions testing when complying with the SO₂ emissions limitation specified in b)(2)d.ii through the documentation required in d)(5) above.

- c. The test(s) shall be conducted in accordance with the test methods and procedures specified in 40 CFR 60.4400 for NO_x and 40 CFR 60.4415 for sulfur (unless exempted pursuant to 40 CFR 60.4365), except the NO_x emissions may be measured when only the turbine is operating for the purpose of demonstrating compliance with the limitations established pursuant to OAC rule 3745-31-05(A)(3). For the purpose of demonstrating compliance with the requirements of 40 CFR Part 60, Subpart KKKK, the HRSG/duct burner shall be in operation during the emissions testing and the NO_x emissions shall be measured when only the combustion turbine and HRSG/duct burner are in operation. The hood burners should not be in operation during the emissions testing.
- d. During the emissions testing, the emissions unit shall be operated under operational conditions approved in advance by the Ohio EPA, Central District Office. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the emissions unit operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the Ohio EPA, Central District Office that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).
- f. Personnel from the Ohio EPA, Central District Office 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.
- g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.

- (2) 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. Emissions Limitation

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emissions Limitation

PE shall not exceed 0.040 lb/MMBtu of actual heat input.

Applicable Compliance Method

Compliance is based on the manufacturer's emissions factor of 0.0120 lb PM/MMBtu multiplied by the AP-42, Section 3.1, Table 3.1-2a ratio of PE to PM (i.e., 1.9 PE / 7.6 PM).

If required, compliance shall be demonstrated through emissions testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emissions Limitations

The emissions unit shall be designed to meet the following:

0.0551 lb CO/MMBtu;
0.0063 lb VOC/MMBtu;
0.0120 lb PM₁₀/MMBtu; and
0.0120 lb PM_{2.5}/MMBtu.

Applicable Compliance Method:

Compliance shall be determined based on documentation of the manufacturer's design specifications.

d. Emissions Limitations

Sulfur dioxide (SO₂) emissions shall not exceed 0.11 tons per month, averaged over a 12-month rolling period from each emissions unit.

Applicable Compliance Method

The SO₂ emissions limitation was established to reflect the potential to emit based on the maximum capacity of the emissions unit (86.3 MMBtu/hr) and the emissions factor found in AP-42, Section 3.1, Table 3.1-2a, as follows.

$$\text{SO}_2: (86.3 \text{ MMBtu/hr}) (0.0034 \text{ lb SO}_2/\text{MMBtu}) (730 \text{ hr/mo}) / (2,000 \text{ lb/ton}) = 0.11 \text{ ton/mo}$$

The emissions factor assumes all sulfur in natural gas is converted to SO₂. Compliance is based on burning only natural gas in this emissions unit.

e. Emissions Limitation

NO_x emissions shall not exceed 20.5 tons per year from each emissions unit.

Applicable Compliance Method

The annual NO_x emissions limitation was established to reflect the potential to emit for this emissions unit taking into consideration the manufacturer's specified NO_x emissions rate of 0.0543 lb NO_x/MMBtu (i.e., 15 ppm at 15 percent oxygen) as follows.

$$(86.3 \text{ MMBtu/hr}) (0.0543 \text{ lb NO}_x/\text{MMBtu}) (8,760 \text{ hr/yr}) / (2,000 \text{ lb/ton}) = 20.5 \text{ ton/yr}$$

Compliance is based on burning only natural gas in this emissions unit, maintaining the emissions unit in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), and demonstrating that the NO_x emissions do not exceed 15 ppm at 15 percent oxygen, through emissions testing conducted in accordance with f)(1) above.

f. Emissions Limitation

The permittee shall comply with one of the following requirements for each emissions unit:

- i. SO₂ emissions shall not exceed 110 nanograms per Joule (ng/J) (0.90 pounds per megawatt-hour (lb/MWh)) gross output from the combustion turbine (P001 or P011) and its associated HRSG/duct burner (P002 or P012); or
- ii. Fuels burned in this emissions unit shall not contain total potential sulfur emissions in excess of 26 ng SO₂/J (0.060 lb SO₂/MMBtu) heat input.

Applicable Compliance Method

Compliance shall be determined through the documentation required in d)(5) above or the emissions testing conducted in accordance with f)(1) above.



g. Emissions Limitations

NO_x emissions shall not exceed 15 ppm at 15 percent oxygen from each emission unit.

Combined NO_x emissions from the combustion turbine (P001 or P011) and its associated HRSG/duct burner (P002 or P012) shall not exceed 25 ppm at 15 percent oxygen or 150 ng/J of useful output (1.2 lb/MWh).

Applicable Compliance Method

Compliance shall be determined through emissions testing conducted in accordance with f)(1) above.

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -Duct Burners: P002 and P012

EU ID	Operations, Property and/or Equipment Description
P002	6.0 MMBtu/hr direct natural gas-fired duct burner and heat recovery steam generator
P012	6.0 MMBtu/hr direct natural gas-fired duct burner and heat recovery steam generator

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)c. and b)(2)c.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 3745-17-11(B)(1)	See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3) <i>June 30, 2008</i>	The emissions unit shall be designed to meet the following: 0.08 lb NO _x /MMBtu; and 0.08 lb CO/MMBtu. Volatile organic compound (VOC) emissions shall not exceed 0.012 tons per month, averaged over a 12-month rolling period from each emissions unit. Sulfur dioxide (SO ₂) emissions shall not exceed 0.0013 tons per month, averaged over a 12-month rolling period from each emissions unit. PM ₁₀ emissions shall not exceed 0.016

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		tons per month, averaged over a 12-month rolling period from each emissions unit. PM _{2.5} emissions shall not exceed 0.016 tons per month, averaged over a 12-month rolling period from each emissions unit. See b)(2)b. below.
c.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions from this air contaminant source because the potential to emit for each pollutant is less than 10 tons per year. See b)(2)c. below.
d.	OAC rule 3745-110-03	See b)(2)d. below.
e.	40 CFR Part 60, Subpart KKKK	See b)(2)e. through b)(2)g. below.
f.	40 CFR Part 60, Subpart A	The permittee shall demonstrate compliance with the applicable requirements identified in 40 CFR Part 60, Subpart KKKK in accordance with 40 CFR Part 60, Subpart A.

(2) Additional Terms and Conditions

- a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I, per OAC rule 3745-17-11(A)(4), does not apply because the process weight, as defined in OAC rule 3745-17-01(B), is equal to zero.
- b. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- d. This emissions unit is not subject to the requirements specified in OAC rule 3745-110-03 because it is not one of the following types of new sources listed in OAC rule 3745-110-02(A)(2): a very large boiler, large boiler, mid-size boiler,

small boiler, stationary combustion turbine, stationary internal combustion engine, or reheat furnace.

- e. The permittee shall comply with one of the following requirements for each emissions unit:
 - i. SO₂ emissions shall not exceed 110 nanograms per Joule (ng/J) (0.90 pounds per megawatt-hour (lb/MWh)) gross output from the combustion turbine (P001 or P011) and its associated HRSG/duct burner (P002 or P012); or
 - ii. Fuels burned in this emissions unit shall not contain total potential sulfur emissions in excess of 26 ng SO₂/J (0.060 lb SO₂/MMBtu) heat input.
- f. Combined NO_x emissions from the combustion turbine (P001 or P011) and its associated HRSG/duct burner (P002 or P012) shall not exceed 25 ppm at 15 percent oxygen or 150 ng/J of useful output (1.2 lb/MWh).
- g. The permittee shall operate and maintain the duct burner in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate and maintain the emissions unit in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s).
- (2) The permittee shall maintain documentation of the manufacturer's design specifications, recommendations, instructions, and/or operating manual(s) for the emissions unit. These documents shall be maintained at the facility and shall be made available to the Ohio EPA, Central District Office upon request.
- (3) The permittee shall maintain the following information for maintenance and repairs performed on the emissions unit:
 - a. the date of the maintenance and/or repair;
 - b. a description of the maintenance and/or repairs performed; and
 - c. the title of person(s) who performed the maintenance and/or repair.
- (4) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

- (5) If the permittee chooses to comply with the SO₂ emissions limitation specified in b)(2)e.ii., a current, valid purchase contract, tariff sheet or transportation contract for the natural gas burned in this emissions unit, shall specify that the total sulfur content is 20 grains of sulfur or less per 100 standard cubic feet and has potential sulfur emissions of less than 26 ng SO₂/J (0.060 lb SO₂/MMBtu) heat input.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Central District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (4) The permittee shall comply with all applicable reporting requirements established pursuant to 40 CFR Part 60, Subpart KKKK, including the following sections.

60.7(a)(1)	Construction date (no later than 30 days after such date)
60.7(a)(3)	Actual start-up date (within 15 days after such date)

f) Testing Requirements

- (1) The permittee shall conduct emissions testing for this emissions unit in accordance with 40 CFR 60.8, 60.4340(a), 60.4400 and 60.4415 and the following requirements:
 - a. The initial emissions testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit. Subsequent emissions testing shall be conducted on an annual basis (no more than 14 calendar months following the previous emissions test).
 - b. The emissions testing shall be conducted to demonstrate compliance with the SO₂ and NO_x emissions limitations established pursuant to 40 CFR Part 60, Subpart KKKK. Pursuant to 40 CFR 60.4365, the permittee shall be exempt from the initial and annual SO₂ emissions testing when complying with the SO₂ emissions limitation specified in b)(2)e.ii through the documentation required in d)(5) above.
 - c. The test(s) shall be conducted in accordance with the test methods and procedures specified in 40 CFR 60.4400 for NO_x and 40 CFR 60.4415 for sulfur (unless exempted pursuant to 40 CFR 60.4365). The gas turbine shall be in operation during the emissions testing. The hood burners should not be in operation during the emissions testing.

- d. During the emissions testing, the emissions unit shall be operated under operational conditions approved in advance by the Ohio EPA, Central District Office. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under "worst case" conditions expected during the life of the permit. As part of the information provided in the "Intent to Test" notification form described below, the permittee shall provide a description of the emissions unit operational conditions they will meet during the emissions testing and describe why they believe "worst case" operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the Ohio EPA, Central District Office that the proposed operating conditions constitute "worst case". Failure to test under the approved conditions may result in Ohio EPA not accepting the test results as a demonstration of compliance.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).
 - f. Personnel from the Ohio EPA, Central District Office 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.
 - g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Central District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Central District Office.
- (2) 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. Emissions Limitations
The emissions unit shall be designed to meet the following:
0.08 lb NO_x/MMBtu; and
0.08 lb CO/MMBtu.

Applicable Compliance Method:

Compliance shall be determined based on documentation of the manufacturer's design specifications.

b. Emissions Limitations

VOC emissions shall not exceed 0.012 tons per month, averaged over a 12-month rolling period from each emissions unit.

SO₂ emissions shall not exceed 0.0013 tons per month, averaged over a 12-month rolling period from each emissions unit.

PM₁₀ emissions shall not exceed 0.016 tons per month, averaged over a 12-month rolling period from each emissions unit.

PM_{2.5} emissions shall not exceed 0.016 tons per month, averaged over a 12-month rolling period from each emissions unit.

Applicable Compliance Method

These emissions limitations were established to reflect the potentials to emit based on the maximum capacity of the emissions unit (6.0 MMBtu/hr) and the emissions factor for each pollutant found in AP-42, Section 1.4, Table 1.4-2, as follows.

VOC: (6.0 MMBtu/hr) (0.0054 lb VOC/MMBtu) (730 hr/mo) / (2,000 lb/ton) = 0.012 ton/mo

SO₂: (6.0 MMBtu/hr) (0.0006 lb SO₂/MMBtu) (730 hr/mo) / (2,000 lb/ton) = 0.0013 ton/mo

PM₁₀: (6.0 MMBtu/hr) (0.0074 lb PM₁₀/MMBtu) (730 hr/mo) / (2,000 lb/ton) = 0.016 ton/mo

PM_{2.5}: (6.0 MMBtu/hr) (0.0074 lb PM_{2.5}/MMBtu) (730 hr/mo) / (2,000 lb/ton) = 0.016 ton/mo

Compliance is based on burning only natural gas in the emissions unit and maintaining the emissions unit in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s).

c. Emissions Limitation

The permittee shall comply with one of the following requirements for each emissions unit:

i. SO₂ emissions shall not exceed 110 nanograms per Joule (ng/J) (0.90 pounds per megawatt-hour (lb/MWh)) gross output from the combustion



turbine (P001 or P011) and its associated HRSG/duct burner (P002 or P012); or

- ii. Fuels burned in this emissions unit shall not contain total potential sulfur emissions in excess of 26 ng SO₂/J (0.060 lb SO₂/MMBtu) heat input.

Applicable Compliance Method

Compliance shall be determined through the documentation required in d)(5) above or emissions testing conducted in accordance with f)(1) above.

- d. Emissions Limitation

Combined NO_x emissions from the combustion turbine (P001 or P011) and its associated HRSG/duct burner (P002 or P012) shall not exceed 25 ppm at 15 percent oxygen or 150 ng/J of useful output (1.2 lb/MWh).

Applicable Compliance Method

Compliance shall be determined through emissions testing conducted in accordance with f)(1) above.

- g) Miscellaneous Requirements

- (1) None.

6. Emissions Unit Group -Hood Burners: P003, P004, P013 and P014

EU ID	Operations, Property and/or Equipment Description
P003	22.86 MMBtu/hr direct natural gas-fired heater for Yankee Hood
P004	22.86 MMBtu/hr direct natural gas-fired heater for Yankee Hood
P013	22.86 MMBtu/hr direct natural gas-fired heater for Yankee Hood
P014	22.86 MMBtu/hr direct natural gas-fired heater for Yankee Hood

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)c. and b)(2)c.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 3745-17-11(B)(1)	See b)(2)a. below.
b.	OAC rule 3745-31-05(A)(3) <i>June 30, 2008</i>	The emissions unit shall be designed to meet the following: 0.066 lb NO _x /MMBtu; and 0.066 lb CO/MMBtu. Volatile organic compound (VOC) emissions shall not exceed 0.045 tons per month, averaged over a 12-month rolling period from each emissions unit. Sulfur dioxide (SO ₂) emissions shall not exceed 0.0049 tons per month, averaged over a 12-month rolling period from each emissions unit.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>PM₁₀ emissions shall not exceed 0.062 tons per month, averaged over a 12-month rolling period from each emissions unit.</p> <p>PM_{2.5} emissions shall not exceed 0.062 tons per month, averaged over a 12-month rolling period from each emissions unit.</p> <p>See b)(2)b. below.</p>
c.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	<p>The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions from this air contaminant source because the potential to emit for each pollutant is less than 10 tons per year.</p> <p>See b)(2)c. below.</p>
d.	OAC rule 3745-110-03	See b)(2)d. below.
e.	40 CFR Part 60, Subpart Dc	See c)(1) below.
f.	40 CFR Part 60, Subpart A	The permittee shall demonstrate compliance with the applicable requirements identified in 40 CFR Part 60, Subpart Dc in accordance with 40 CFR Part 60, Subpart A.

(2) Additional Terms and Conditions

- a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Therefore, pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I, per OAC rule 3745-17-11(A)(4), does not apply because the process weight, as defined in OAC rule 3745-17-01(B), is equal to zero.
- b. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.

- d. This emissions unit is not subject to the requirements specified in OAC rule 3745-110-03 because it is not one of the following types of new sources listed in OAC rule 3745-110-02(A)(2): a very large boiler, large boiler, mid-size boiler, small boiler, stationary combustion turbine, stationary internal combustion engine, or reheat furnace.
- c) Operational Restrictions
 - (1) The permittee shall burn only natural gas in this emissions unit.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall properly install, operate and maintain the emissions unit in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s).
 - (2) The permittee shall maintain documentation of the manufacturer's design specifications, recommendations, instructions, and/or operating manual(s) for the emissions unit. These documents shall be maintained at the facility and shall be made available to the Ohio EPA, Central District Office upon request.
 - (3) The permittee shall maintain the following information for maintenance and repairs performed on the emissions unit:
 - a. the date of the maintenance and/or repair;
 - b. a description of the maintenance and/or repairs performed; and
 - c. the title of person(s) who performed the maintenance and/or repair.
 - (4) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
 - (5) The permittee shall maintain one of the following records:
 - a. The amount of natural gas combusted during each calendar month; or
 - b. The total amount of natural gas delivered for burning in this emissions unit during each calendar month.
- e) Reporting Requirements
 - (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Central District Office.
 - (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (4) The permittee shall comply with all applicable reporting requirements established pursuant to 40 CFR Part 60, Subpart Dc, including the following sections.

60.7(a)(1)	Construction date (no later than 30 days after such date)
60.7(a)(3)	Actual start-up date (within 15 days after such date)

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. Emissions Limitations

The emissions unit shall be designed to meet the following:

0.066 lb NO_x/MMBtu; and
 0.066 lb CO/MMBtu.

Applicable Compliance Method:

Compliance shall be determined based on documentation of the manufacturer's design specifications.

b. Emissions Limitations

VOC emissions shall not exceed 0.045 tons per month, averaged over a 12-month rolling period from each emissions unit.

SO₂ emissions shall not exceed 0.0049 tons per month, averaged over a 12-month rolling period from each emissions unit.

PM₁₀ emissions shall not exceed 0.062 tons per month, averaged over a 12-month rolling period from each emissions unit.

PM_{2.5} emissions shall not exceed 0.062 tons per month, averaged over a 12-month rolling period from each emissions unit.

Applicable Compliance Method

These emissions limitations were established to reflect the potentials to emit based on the maximum capacity of the emissions unit (22.86 MMBtu/hr) and the emissions factor for each pollutant found in AP-42, Section 1.4, Table 1.4-2, as follows.



Final Permit-to-Install and Operate

Sofidel America

Permit Number: P0120583

Facility ID: 0165010410

Effective Date: 8/23/2016

VOC: $(22.86 \text{ MMBtu/hr}) (0.0054 \text{ lb VOC/MMBtu}) (730 \text{ hr/mo}) / (2,000 \text{ lb/ton}) = 0.045 \text{ ton/mo}$

SO₂: $(22.86 \text{ MMBtu/hr}) (0.0006 \text{ lb SO}_2\text{/MMBtu}) (730 \text{ hr/mo}) / (2,000 \text{ lb/ton}) = 0.0049 \text{ ton/mo}$

PM₁₀: $(22.86 \text{ MMBtu/hr}) (0.0074 \text{ lb PM}_{10}\text{/MMBtu}) (730 \text{ hr/mo}) / (2,000 \text{ lb/ton}) = 0.062 \text{ ton/mo}$

PM_{2.5}: $(22.86 \text{ MMBtu/hr}) (0.0074 \text{ lb PM}_{2.5}\text{/MMBtu}) (730 \text{ hr/mo}) / (2,000 \text{ lb/ton}) = 0.062 \text{ ton/mo}$

Compliance is based on burning only natural gas in the emissions unit and maintaining the emissions unit in accordance with the manufacturer's recommendations, instructions, and/or operating manual(s).

g) Miscellaneous Requirements

(1) None.

7. Emissions Unit Group -Wet Ends: P005 and P015

EU ID	Operations, Property and/or Equipment Description
P005	Paper Machine 1 Wet End
P015	Paper Machine 2 Wet End

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)d. and b)(2)c.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 95.6 pounds per hour from each emissions unit, based upon Table I of OAC rule 3745-17-11.
c.	OAC rule 3745-31-05(A)(3) <i>June 30, 2008</i>	PM ₁₀ emissions shall not exceed 0.33 pounds per hour and 1.4 tons per year from each emissions unit. PM _{2.5} emissions shall not exceed 0.16 pounds per hour and 0.72 tons per year from each emissions unit. See b)(2)b. and b)(2)d. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions from this air contaminant source because the controlled potential to emit for each pollutant is less than 10 tons per year. See b)(2)c. below.
e.	OAC rule 3745-31-05(F) [Voluntary limits to avoid Title V]	PM ₁₀ emissions shall not exceed 0.33 pounds per hour and 1.4 tons per year. See b)(2)c. and b)(2)d. below.

(2) Additional Terms and Conditions

- a. This emissions unit is the source of particulate emissions from the manufacturing of paper products in the paper machine prior to entering the yankee dryer.
- b. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- d. The hourly and annual PM₁₀ and PM_{2.5} emissions limitations were established to reflect the potentials to emit, as vented to the cyclone/mist eliminator, in accordance with the information provided in the permit application. The monitoring, recordkeeping, and reporting requirements for the cyclone/mist eliminator as established in the following terms and conditions are sufficient to demonstrate compliance with these limits.

c) Operational Restrictions

- (1) The emissions from this emissions unit shall be vented to a cyclone/mist eliminator when the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the cyclone/mist eliminator liquid flow rate (in gallons per minute) during operation of this/these emissions unit(s), including periods of startup and shutdown. The permittee shall record the liquid flow rate 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. The acceptable range or limit for the liquid flow rate shall be based upon the manufacturer's specifications.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) 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 title(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 control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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 the 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 flow rate readings immediately after the corrective action was implemented; and
- k. the title(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.

These range(s) and/or limit(s) for the liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. 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 an administrative modification.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Central District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual PER the following information concerning the operations of the cyclone/mist eliminator during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the liquid flow rate was outside of the appropriate range or limit specified by the manufacturer;
 - 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 cyclone/mist eliminator;
 - c. each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the liquid flow rate into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and recordkeeping requirements of this permit.

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. Emissions Limitation

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emissions Limitation

Particulate emissions shall not exceed 95.6 pounds per hour from each emissions unit, based upon Table I of OAC rule 3745-17-11.

Applicable Compliance Method

The hourly particulate emissions limitation is greater than the controlled potential to emit for this emissions unit, calculated based on information provided in the permit application as follows.

PE: (grain loading) (exhaust flowrate) / (7,000 gr/lb) = 1.6 lb/hr, where:

grain loading = 0.0022 gr/scf (manufacturer's guarantee)

exhaust flowrate = 5,237,871 scf/hr

Compliance shall be determined based on maintaining the cyclone/mist eliminator in accordance with the monitoring and/or recordkeeping requirements in d)(1) above.

If required, compliance with the particulate emissions limitation shall be determined through emissions testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emissions Limitations

PM₁₀ emissions shall not exceed 0.33 pounds per hour and 1.4 tons per year from each emissions unit.

PM_{2.5} emissions shall not exceed 0.16 pounds per hour and 0.72 tons per year from each emissions unit.

Applicable Compliance Method

The hourly emissions limitations were established to reflect the controlled potentials to emit based on information provided in the permit application, as follows.

PM₁₀: (grain loading) (exhaust flowrate) / (7,000 gr/lb) = 0.33 lb/hr, where:

grain loading = 0.0004 gr/scf (conservative outlet grain loading based on sampling data from a similar source)

exhaust flowrate = 5,237,871 scf/hr

PM_{2.5}: (PM₁₀) (PM_{2.5}/PM₁₀ ratio) = 0.16 lb/hr, where:

PM₁₀ = 0.33 lb/hr



PM_{2.5}/PM₁₀ ratio = 50% (U.S. EPA's PM Augmentation Tool for low velocity mist eliminator and wet cyclonic separator under SCC 30701201)

The annual emissions limitations were established by multiplying the hourly emissions limitations by 8,760 hours per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emissions limitations may be assumed provided the permittee complies with the hourly emissions limitations.

Compliance shall be determined based on maintaining the cyclone/mist eliminator in accordance with the monitoring and/or recordkeeping requirements in d)(1) above.

g) Miscellaneous Requirements

(1) None.

8. Emissions Unit Group -Yankee Hoods: P006 and P016

EU ID	Operations, Property and/or Equipment Description
P006	Hot air hood on Yankee Cylinder
P016	Hot air hood on Yankee Cylinder

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)d. and b)(2)c.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 37.1 pounds per hour from each emissions unit, based upon Table I of OAC rule 3745-17-11.
c.	OAC rule 3745-31-05(A)(3) <i>June 30, 2008</i>	PM ₁₀ emissions shall not exceed 0.83 pounds per hour and 3.7 tons per year from each emissions unit. PM _{2.5} emissions shall not exceed 0.42 pounds per hour and 1.8 tons per year from each emissions unit. See b)(2)b. and b)(2)d. below.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions from this air contaminant source because the controlled potential to emit for each pollutant is less than 10 tons per year. See b)(2)c. below.
e.	OAC rule 3745-31-05(F) [Voluntary limits to avoid Title V]	PM ₁₀ emissions shall not exceed 0.83 pounds per hour and 3.7 tons per year from each emissions unit. See b)(2)c. and b)(2)d. below.

(2) Additional Terms and Conditions

- a. This emissions unit is the source of particulate emissions from paper dust generated during the drying of paper products in the yankee dryer.
- b. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- d. The hourly and annual PM₁₀ and PM_{2.5} emissions limitations were established to reflect the potentials to emit, in accordance with the information provided in the permit application. It is not necessary to establish monitoring, recordkeeping or reporting requirements to ensure compliance with these limits.

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) None.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Central District Office.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

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. Emissions Limitation

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emissions Limitation

Particulate emissions shall not exceed 37.1 pounds per hour from each emissions unit, based upon Table I of OAC rule 3745-17-11.

Applicable Compliance Method

The hourly particulate emissions limitation is greater than the potential to emit for this emissions unit, calculated based on information provided in the permit application as follows.

PE: (grain loading) (exhaust flowrate) / (7,000 gr/lb) = 1.7 lb/hr, where:

grain loading = 0.0044 gr/scf (conservative estimated outlet grain loading based on engineering judgment from the facility's experience, sampling data from similar sources, and manufacturer's data)

exhaust flowrate = 2,669,788 scf/hr

If required, compliance with the particulate emissions limitation shall be determined through emissions testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. The results of any PE testing conducted on P006 shall be compared to the sum of the PE limitations for P001, P002, P003, P004 and P006. The results of any PE testing conducted on P016 shall be compared to the sum of the PE limitations for P011, P012, P013, P014 and P016.

c. Emissions Limitations

PM₁₀ emissions shall not exceed 0.83 pounds per hour and 3.7 tons per year from each emissions unit.

PM_{2.5} emissions shall not exceed 0.42 pounds per hour and 1.8 tons per year from each emissions unit.

Applicable Compliance Method

The hourly emissions limitations were established to reflect the potentials to emit based on information provided in the permit application, as follows.

PM₁₀: (grain loading) (exhaust flowrate) / (7,000 gr/lb) = 0.83 lb/hr, where:

grain loading = 0.0022 gr/scf (conservative outlet grain loading based on sampling data from a similar source)

exhaust flowrate = 2,669,788 scf/hr

PM_{2.5}: (PM₁₀) (PM_{2.5}/PM₁₀ ratio) = 0.42 lb/hr, where:

PM₁₀ = 0.83 lb/hr

PM_{2.5}/PM₁₀ ratio = 50% (conservative assumption based on the 35% PM_{2.5}/PM₁₀ ratio provided by U.S. EPA's PM Augmentation Tool for uncontrolled emissions under SCC 30701220)

The annual emissions limitations were established by multiplying the hourly emissions limitations by 8,760 hours per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emissions limitations may be assumed provided the permittee complies with the hourly emissions limitations.

If required, compliance shall be determined through emissions testing conducted in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. The results of any PM testing conducted on P006 shall be compared to the sum of the PM limitations for P001, P002, P003, P004 and P006. The results of any PM testing conducted on P016 shall be compared to the sum of the PM limitations for P011, P012, P013, P014 and P016.

g) Miscellaneous Requirements

(1) None.

9. Emissions Unit Group -Dry Ends: P007 and P017

EU ID	Operations, Property and/or Equipment Description
P007	Paper Machine 1 Dry End
P017	Paper Machine 2 Dry End

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)d. and b)(2)c.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 21.2 pounds per hour from each emissions unit, based upon Table I of OAC rule 3745-17-11.
c.	OAC rule 3745-31-05(A)(3) <i>June 30, 2008</i>	PM ₁₀ emissions shall not exceed 0.57 pounds per hour and 2.5 tons per year from each emissions unit. PM _{2.5} emissions shall not exceed 0.28 pounds per hour and 1.2 tons per year from each emissions unit. See b)(2)b. and b)(2)d. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions from this air contaminant source because the controlled potential to emit for each pollutant is less than 10 tons per year. See b)(2)c. below.
e.	OAC rule 3745-31-05(F) [Voluntary limits to avoid Title V]	PM ₁₀ emissions shall not exceed 0.57 pounds per hour and 2.5 tons per year. See b)(2)c. and b)(2)d. below.

(2) Additional Terms and Conditions

- a. This emissions unit is the source of particulate emissions from the manufacturing of paper products in the paper machine after exiting the yankee dryer.
- b. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- d. The hourly and annual PM₁₀ and PM_{2.5} emissions limitations were established to reflect the potentials to emit, as vented to the cyclone/water spray, in accordance with the information provided in the permit application. The monitoring, recordkeeping, and reporting requirements for the cyclone/water spray as established in the following terms and conditions are sufficient to demonstrate compliance with these limits.

c) Operational Restrictions

- (1) The emissions from this emissions unit shall be vented to a cyclone/water spray when the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the cyclone/water spray liquid flow rate (in gallons per minute) during operation of this/these emissions unit(s), including periods of startup and shutdown. The permittee shall record the liquid flow rate 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. The acceptable range or limit for the liquid flow rate shall be based upon the manufacturer's specifications.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) 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 title(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 control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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 the 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 flow rate readings immediately after the corrective action was implemented; and
- k. the title(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.

These range(s) and/or limit(s) for the liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. 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 an administrative modification.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Central District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual PER the following information concerning the operations of the cyclone/water spray during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the liquid flow rate was outside of the appropriate range or limit specified by the manufacturer;
 - 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 cyclone/water spray;
 - c. each incident of deviation described in "a" or "b" (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in "a" or "b" where prompt corrective action, that would bring the liquid flow rate into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in "a" or "b" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and recordkeeping requirements of this permit.

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. Emissions Limitation

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emissions Limitation

Particulate emissions shall not exceed 21.2 pounds per hour from each emissions unit, based upon Table I of OAC rule 3745-17-11.

Applicable Compliance Method

The hourly particulate emissions limitation is greater than the controlled potential to emit for this emissions unit, calculated based on information provided in the permit application as follows.

PE: (grain loading) (exhaust flowrate) / (7,000 gr/lb) = 1.4 lb/hr, where:

grain loading = 0.0022 gr/scf (manufacturer's guarantee)

exhaust flowrate = 4,538,640 scf/hr

Compliance shall be determined based on maintaining the cyclone/water spray in accordance with the monitoring and/or recordkeeping requirements in d)(1) above.

If required, compliance with the particulate emissions limitation shall be determined through emissions testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emissions Limitations

PM₁₀ emissions shall not exceed 0.57 pounds per hour and 2.5 tons per year from each emissions unit.

PM_{2.5} emissions shall not exceed 0.28 pounds per hour and 1.2 tons per year from each emissions unit.

Applicable Compliance Method

The hourly emissions limitations were established to reflect the controlled potentials to emit based on information provided in the permit application, as follows.

PM₁₀: (grain loading) (exhaust flowrate) / (7,000 gr/lb) = 0.57 lb/hr, where:

grain loading = 0.0009 gr/scf (conservative outlet grain loading based on sampling data from a similar source)

exhaust flowrate = 4,538,640 scf/hr

PM_{2.5}: (PM₁₀) (PM_{2.5}/PM₁₀ ratio) = 0.28 lb/hr, where:

PM₁₀ = 0.57 lb/hr



Final Permit-to-Install and Operate

Sofidel America

Permit Number: P0120583

Facility ID: 0165010410

Effective Date: 8/23/2016

PM_{2.5}/PM₁₀ ratio = 50% (U.S. EPA's PM Augmentation Tool for low velocity mist eliminator and wet cyclonic separator under SCC 30701201)

The annual emissions limitations were established by multiplying the hourly emissions limitations by 8,760 hours per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emissions limitations may be assumed provided the permittee complies with the hourly emissions limitations.

Compliance shall be determined based on maintaining the cyclone/water spray in accordance with the monitoring and/or recordkeeping requirements in d)(1) above.

g) Miscellaneous Requirements

(1) None.

10. Emissions Unit Group -Pulp & Paper Machine Additives: P008 and P018

EU ID	Operations, Property and/or Equipment Description
P008	Pulp Stock Preparation and Paper Machine 1 Chemical Usage
P018	Pulp Stock Preparation and Paper Machine 2 Chemical Usage

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)b., d)(2), d)(3), d)(4), d)(5) and e)(3)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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)	VOC emissions shall not exceed 1.7 tons per month, averaged over a 12-month rolling period from each emissions unit.
b.	OAC rule 3745-114-01 and ORC 3704.03(F)(3)(c) and (F)(4) [Toxic Air Contaminant Statute]	See d)(2) through d)(5) below.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain monthly records of the following information:
 - a. the company identification for each VOC-containing pulp additive (e.g., strengtheners, biocides, defoamers, retention aids, enzymes) and glue/cylinder additive (e.g., adhesives, release agents, anti-corrosives) employed in this emissions unit;
 - b. the VOC content of each VOC-containing pulp additive and glue/cylinder additive employed in this emissions unit, in percent by weight;
 - c. the tons of each VOC-containing pulp additive and glue/cylinder additive employed during the month in this emissions unit;
 - d. the total VOC emissions from all pulp additives and glue/cylinder additives employed during the month in this emissions unit, in ton(s); and
 - e. the total VOC emissions, averaged over a 12-month rolling period from all pulp additives and glue/cylinder additives employed in this emissions unit (i.e., the sum of the total VOC emissions from the current month and the total VOC emissions from the previous 11 months, divided by 12), in ton(s).
- (2) The permit application for this/these emissions unit(s) was evaluated based on the actual materials and the design parameters of the emissions unit(s)' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
 - a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological

Exposure Indices”; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “X” is 24 hours per day and “Y” is 7 days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$\text{TLV}/10 \times 8/\text{X} \times 5/\text{Y} = 4 \text{ TLV}/\text{XY} = \text{MAGLC}$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: methanol

TLV (mg/m³): 0.262

Maximum Hourly Emission Rate (lb/hr): 0.14

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 9.79

MAGLC (ug/m³): 6,230

The permittee, has demonstrated that emissions of methanol from this emissions unit(s) is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (3) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final permit prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (4) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (5) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Central District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the annual PER. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

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. Emissions Limitation

VOC emissions shall not exceed 1.7 tons per month, averaged over a 12-month rolling period from each emissions unit.

Applicable Compliance Method:

Compliance shall be determined based on the records maintained in accordance with the requirements specified in d)(1) above.

g) Miscellaneous Requirements

- (1) None.

11. P009, Rewinder

Operations, Property and/or Equipment Description:

Rewinder with cyclone/water spray

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. b)(1)d. and b)(2)b.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. 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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 21.2 pounds per hour, based upon Table I of OAC rule 3745-17-11.
c.	OAC rule 3745-31-05(A)(3) <i>June 30, 2008</i>	PM ₁₀ emissions shall not exceed 0.44 pounds per hour and 2.0 tons per year. PM _{2.5} emissions shall not exceed 0.22 pounds per hour and 0.97 tons per year. See b)(2)a. and b)(2)c. below.
d.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions from this air contaminant source because the controlled potential to



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emit for each pollutant is less than 10 tons per year. See b)(2)b. below.
e.	OAC rule 3745-31-05(F) [Voluntary limits to avoid Title V]	PM ₁₀ emissions shall not exceed 0.44 pounds per hour and 2.0 tons per year. See b)(2)b. and b)(2)c. below.

(2) Additional Terms and Conditions

- a. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. The hourly and annual PM₁₀ and PM_{2.5} emissions limitations were established to reflect the potentials to emit, as vented to the cyclone/water spray, in accordance with the information provided in the permit application. The monitoring, recordkeeping, and reporting requirements for the cyclone/water spray as established in the following terms and conditions are sufficient to demonstrate compliance with these limits.

c) Operational Restrictions

- (1) The emissions from this emissions unit shall be vented to a cyclone/water spray when the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the cyclone/water spray liquid flow rate (in gallons per minute) during operation of this/these emissions unit(s), including periods of startup and shutdown. The permittee shall record the liquid flow rate 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. The acceptable range or limit for the liquid flow rate shall be based upon the manufacturer's specifications.

Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) 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 title(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 control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) 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 the 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 flow rate readings immediately after the corrective action was implemented; and
- k. the title(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.

These range(s) and/or limit(s) for the liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. 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 an administrative modification.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Central District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

- (3) The permittee shall identify in the annual PER the following information concerning the operations of the cyclone/water spray during the 12-month reporting period for this/these emissions unit(s):
- a. each period of time (start time and date, and end time and date) when the liquid flow rate was outside of the appropriate range or limit specified by the manufacturer;
 - 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 cyclone/water spray;
 - c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the liquid flow rate into compliance with the appropriate range or limit contained in this permit, was determined to be necessary and was not taken; and
 - e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and recordkeeping requirements of this permit.

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. Emissions Limitation

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emissions Limitation

Particulate emissions shall not exceed 21.2 pounds per hour, based upon Table I of OAC rule 3745-17-11.

Applicable Compliance Method

The hourly particulate emissions limitation is greater than the controlled potential to emit for this emissions unit, calculated based on information provided in the permit application as follows.

PE: (grain loading) (exhaust flowrate) / (7,000 gr/lb) = 1.1 lb/hr, where:

grain loading = 0.0022 gr/scf (manufacturer's guarantee)

exhaust flowrate = 3,559,718 scf/hr

Compliance shall be determined based on maintaining the cyclone/water spray in accordance with the monitoring and/or recordkeeping requirements in d)(1) above.

If required, compliance with the particulate emissions limitation shall be determined through emissions testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emissions Limitations

PM₁₀ emissions shall not exceed 0.44 pounds per hour and 2.0 tons per year.

PM_{2.5} emissions shall not exceed 0.22 pounds per hour and 0.97 tons per year.

Applicable Compliance Method

The hourly emissions limitations were established to reflect the controlled potentials to emit based on information provided in the permit application, as follows.

PM₁₀: (grain loading) (exhaust flowrate) / (7,000 gr/lb) = 0.44 lb/hr, where:

grain loading = 0.0009 gr/scf (conservative outlet grain loading based on sampling data from a similar source)

exhaust flowrate = 3,559,718 scf/hr

PM_{2.5}: (PM₁₀) (PM_{2.5}/PM₁₀ ratio) = 0.22 lb/hr, where:

PM₁₀ = 0.44 lb/hr

PM_{2.5}/PM₁₀ ratio = 50% (U.S. EPA's PM Augmentation Tool for low velocity mist eliminator and wet cyclonic separator under SCC 30701201)

The annual emissions limitations were established by multiplying the hourly emissions limitations by 8,760 hours per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emissions limitations may be assumed provided the permittee complies with the hourly emissions limitations.

Compliance shall be determined based on maintaining the cyclone/water spray in accordance with the monitoring and/or recordkeeping requirements in d)(1) above.



Final Permit-to-Install and Operate
Sofidel America
Permit Number: P0120583
Facility ID: 0165010410
Effective Date: 8/23/2016

g) Miscellaneous Requirements

- (1) None.

12. P010, Dust pelletizer

Operations, Property and/or Equipment Description:

Dust pelletizer with filter dust collector

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)d. and b)(2)b.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 0.551 pounds per hour, based upon Table I of OAC rule 3745-17-11.
c.	OAC rule 3745-31-05(A)(3) <i>June 30, 2008</i>	PM ₁₀ emissions shall not exceed 0.009 pounds per hour and 0.04 tons per year. PM _{2.5} emissions shall not exceed 0.004 pounds per hour and 0.02 tons per year. See b)(2)a. and b)(2)c. below.
d.	OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i>	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions from this air contaminant source because the controlled potential to



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emit for each pollutant is less than 10 tons per year. See b)(2)b. below.
e.	OAC rule 3745-31-05(F) [Voluntary limits to avoid Title V]	PM ₁₀ emissions shall not exceed 0.009 pounds per hour and 0.04 tons per year. See b)(2)b. and b)(2)c. below.

(2) Additional Terms and Conditions

- a. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. The hourly and annual PM₁₀ and PM_{2.5} emissions limitations were established to reflect the potentials to emit, as vented to the filter dust collector, in accordance with the information provided in the permit application. The monitoring, recordkeeping, and reporting requirements for the filter dust collector as established in the following terms and conditions are sufficient to demonstrate compliance with these limits.

c) Operational Restrictions

- (1) The emissions from this emissions unit shall be vented to a filter dust collector when the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the filter dust collector when the emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the filter dust collector 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. The acceptable pressure drop shall be based upon the manufacturer's specifications.

Whenever the monitored value for the pressure drop deviates from the 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 title(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 title(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 on the pressure drop across the filter dust collector is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Central District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

- (3) The permittee shall identify in the annual PER the following information concerning the operations of the filter dust collector during the 12-month reporting period for this/these emissions unit(s):
- a. each period of time (start time and date, and end time and date) when the pressure drop across the filter dust collector was outside of the range specified by the manufacturer;
 - 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 filter dust collector;
 - c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;
 - d. each incident of deviation described in “a” or “b” 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” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and recordkeeping requirements of this permit.

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. Emissions Limitation

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emissions Limitation

Particulate emissions shall not exceed 0.551 pounds per hour, based upon Table I of OAC rule 3745-17-11.

Applicable Compliance Method

The hourly particulate emissions limitation is greater than the controlled potential to emit for this emissions unit, calculated based on information provided in the permit application as follows.

PE: (grain loading) (exhaust flowrate) / (7,000 gr/lb) = 0.04 lb/hr, where:



grain loading = 0.0022 gr/scf (manufacturer's guarantee)

exhaust flowrate = 141,259 scf/hr

Compliance shall be determined based on maintaining the filter dust collector in accordance with the monitoring and/or recordkeeping requirements in d)(1) above.

If required, compliance with the particulate emissions limitation shall be determined through emissions testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emissions Limitations

PM₁₀ emissions shall not exceed 0.009 pounds per hour and 0.04 tons per year.

PM_{2.5} emissions shall not exceed 0.004 pounds per hour and 0.02 tons per year.

Applicable Compliance Method

The hourly emissions limitations were established to reflect the controlled potentials to emit based on information provided in the permit application, as follows.

PM₁₀: (grain loading) (exhaust flowrate) / (7,000 gr/lb) = 0.009 lb/hr, where:

grain loading = 0.00044 gr/scf (conservative outlet grain loading based on sampling data from a similar source)

exhaust flowrate = 141,259 scf/hr

PM_{2.5}: (PM₁₀) (PM_{2.5}/PM₁₀ ratio) = 0.004 lb/hr, where:

PM₁₀ = 0.009 lb/hr

PM_{2.5}/PM₁₀ ratio = 50% (conservative assumption based on the 45% PM_{2.5}/PM₁₀ ratio provided by U.S. EPA's PM Augmentation Tool for fabric filter, low temperature and baghouse under SCC 30701201)

The annual emissions limitations were established by multiplying the hourly emissions limitations by 8,760 hours per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emissions limitations may be assumed provided the permittee complies with the hourly emissions limitations.

Compliance shall be determined based on maintaining the filter dust collector in accordance with the monitoring and/or recordkeeping requirements in d)(1) above.



Final Permit-to-Install and Operate

Sofidel America

Permit Number: P0120583

Facility ID: 0165010410

Effective Date: 8/23/2016

If required, compliance shall be determined through emissions testing conducted in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M.

g) Miscellaneous Requirements

- (1) None.

13. Emissions Unit Group -Converting Lines: P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029 and P030

EU ID	Operations, Property and/or Equipment Description
P019 through P030	Converting lines consisting of core winder, unwinding/rewinding operations, log saw, and flexographic printing

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. b)(1)e. and b)(2)c.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. 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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(1)	Particulate emissions shall not exceed 7.2 pounds per hour from each emissions unit, based upon Table I of OAC rule 3745-17-11.
c.	OAC rule 3745-21-09(Y)	See b)(2)a. below.
d.	OAC rule 3745-31-05(A)(3) <i>June 30, 2008</i>	PM ₁₀ emissions shall not exceed 0.07 pounds per hour and 0.29 tons per year from each emissions unit. PM _{2.5} emissions shall not exceed 0.03



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>pounds per hour and 0.14 tons per year from each emissions unit.</p> <p>VOC emissions shall not exceed 0.10 tons per month, averaged over a 12-month rolling period from each emissions unit.</p> <p>See b)(2)b. and b)(2)d. below.</p>
e.	<p>OAC rule 3745-31-05(A)(3)(a)(ii) <i>June 30, 2008</i></p>	<p>The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the emissions from this air contaminant source because the controlled potential to emit for each pollutant is less than 10 tons per year.</p> <p>See b)(2)c. below.</p>
f.	<p>OAC rule 3745-31-05(F) [Voluntary limits to avoid Title V]</p>	<p>PM₁₀ emissions shall not exceed 0.07 pounds per hour and 0.29 tons per year from each emissions unit.</p> <p>See b)(2)c. and b)(2)d. below.</p>

(2) Additional Terms and Conditions

- a. OAC rule 3745-21-09(Y)(2)(b) exempts this emissions unit from the requirements of OAC rule 3745-21-09(Y)(1) because the total maximum usage of coatings and inks in all flexographic, packaging rotogravure and publication rotogravure printing lines at the facility is less than or equal to 148 tons per year.
- b. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- c. This requirement applies once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- d. The hourly and annual PM₁₀ and PM_{2.5} emissions limitations were established to reflect the potentials to emit, as vented to the filter dust collectors, in accordance with the information provided in the permit application. The monitoring, recordkeeping, and reporting requirements for the filter dust collectors as established in the following terms and conditions are sufficient to demonstrate compliance with these limits.

c) Operational Restrictions

- (1) The emissions from this emissions unit shall be vented to a filter dust collector when the emissions unit is in operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the filter dust collector when the emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the filter dust collector 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. The acceptable pressure drop shall be based upon the manufacturer's specifications.

Whenever the monitored value for the pressure drop deviates from the 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 title(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 title(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 on the pressure drop across the filter dust collector is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the Ohio EPA, Central District Office. In addition, approved revisions to the range will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (2) The permittee shall maintain monthly records of the following information:
- a. the company identification for each VOC-containing glue and ink employed in this emissions unit;
 - b. the VOC content of each VOC-containing glue and ink employed in this emissions unit, in percent by weight;
 - c. the tons of each VOC-containing glue and ink employed during the month in this emissions unit;
 - d. the total VOC emissions from all glues and inks employed during the month in this emissions unit, in ton(s); and
 - e. the total VOC emissions, averaged over a 12-month rolling period from all glues and inks employed in this emissions unit (i.e., the sum of the VOC emissions from the current month and the VOC emissions from the previous 11 months, divided by 12), in ton(s).

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the Central District Office.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA, Central District Office by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) The permittee shall identify in the annual PER the following information concerning the operations of the filter dust collector during the 12-month reporting period for this/these emissions unit(s):
 - a. each period of time (start time and date, and end time and date) when the pressure drop across the filter dust collector was outside of the range specified by the manufacturer;
 - 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 filter dust collector;

- c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in “a” or “b” 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” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and recordkeeping requirements of this permit.

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. Emissions Limitation

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9.

- b. Emissions Limitation

Particulate emissions shall not exceed 7.2 pounds per hour from each emissions unit, based upon Table I of OAC rule 3745-17-11.

Applicable Compliance Method

The hourly particulate emissions limitation is greater than the controlled potential to emit for this emissions unit, calculated based on information provided in the permit application as follows.

PE: (grain loading) (exhaust flowrate) / (7,000 gr/lb) = 0.33 lb/hr, where:

grain loading = 0.0022 gr/scf (manufacturer’s guarantee)

exhaust flowrate = 1,059,440 scf/hr

Compliance shall be determined based on maintaining the filter dust collector in accordance with the monitoring and/or recordkeeping requirements in d)(1) above.

If required, compliance with the particulate emissions limitation shall be determined through emissions testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emissions Limitations

PM₁₀ emissions shall not exceed 0.07 pounds per hour and 0.29 tons per year from each emissions unit.

PM_{2.5} emissions shall not exceed 0.03 pounds per hour and 0.14 tons per year from each emissions unit.

Applicable Compliance Method

The hourly emissions limitations were established to reflect the controlled potentials to emit based on information provided in the permit application, as follows.

PM₁₀: (grain loading) (exhaust flowrate) / (7,000 gr/lb) = 0.07 lb/hr, where:

grain loading = 0.0004 gr/scf (conservative outlet grain loading based on sampling data from a similar source)

exhaust flowrate = 1,059,440 scf/hr

PM_{2.5}: (PM₁₀) (PM_{2.5}/PM₁₀ ratio) = 0.03 lb/hr, where:

PM₁₀ = 0.07 lb/hr

PM_{2.5}/PM₁₀ ratio = 50% (conservative assumption based on the 45% PM_{2.5}/PM₁₀ ratio provided by U.S. EPA's PM Augmentation Tool for fabric filter, low temperature and baghouse under SCC 30701201)

The annual emissions limitations were established by multiplying the hourly emissions limitations by 8,760 hours per year and dividing by 2,000 pounds per ton. Therefore, compliance with the annual emissions limitations may be assumed provided the permittee complies with the hourly emissions limitations.

Compliance shall be determined based on maintaining the filter dust collector in accordance with the monitoring and/or recordkeeping requirements in d)(1) above.

If required, compliance shall be determined through emissions testing conducted in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Methods 201/201A and 202 of 40 CFR Part 51, Appendix M.

d. Emissions Limitation

VOC emissions shall not exceed 0.10 tons per month, averaged over a 12-month rolling period from each emissions unit.



Final Permit-to-Install and Operate
Sofidel America
Permit Number: P0120583
Facility ID: 0165010410
Effective Date: 8/23/2016

Applicable Compliance Method:

Compliance shall be determined based on the records maintained in accordance with the requirements specified in d)(2) above.

- g) Miscellaneous Requirements
 - (1) None.