

Facility ID: 1409010021 Issuance type: Title V Preliminary Proposed Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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## Part II - Specific Facility Terms and Conditions

### a State and Federally Enforceable Section

1. The following insignificant emissions units are located at this facility:

F001 plant roadways and parking areas;  
B008 infrared dryers;  
P003 material makedown 1;  
P004 material makedown 2;  
P005 maintenance welding;  
B009 emergency diesel fired sump pump;  
P006 core cutters;  
P007 sheeter/slitters; and  
T001 process storage tanks

Each insignificant emissions unit at this facility must comply with all applicable state and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

2. Air permit to install (PTI) 14-04175 as modified October 24, 2006 covers the Boiler Replacement Project at the Bluegrass Mills Holding Company facility which involves the replacement of coal fired boiler (Ohio EPA emissions units 1409010021 B003) with two new gas/Number 2 oil fired boilers (B005 and B006.)

The federally enforceable terms and conditions of this PTI have been included for the purpose of netting out of Non-Attainment New Source Review (NNSR) and corresponding Ohio Administrative Code (OAC) regulations for nitrogen oxides (NOx), and netting out of Prevention of Significant Deterioration (PSD) for nitrogen oxides (NOx), sulfur dioxide (SO<sub>2</sub>), and carbon monoxide (CO) emissions. In order to verify that the emissions of these pollutants do not exceed the allowable emission rates described in the netting table below, the permittee must comply with the limitations specified in each emission unit's respective terms and conditions. The other pollutants were considered in the context of the project's analysis, however they were not major for this project.

Following the NSR definitions in OAC rule 3745-31-01(III) and OAC rule 3745-31-01(O), the actual baseline emissions were based on the two years prior to the date of the original permit application for the Boiler Replacement Project, submitted May 29, 1996. The facility used the period of 1994 - 1995 as the baseline for emission calculations of the following pollutants: nitrogen oxides (NOx), sulfur dioxide (SO<sub>2</sub>), and carbon monoxide (CO) emissions.

The details of the netting calculations are specified in PTI 14-04175, Part II - FACILITY SPECIFIC TERMS AND CONDITIONS, Section A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions, Paragraph II Netting Demonstration.

The above reference table includes all actual emissions from the coal boiler (B003) at the facility that are being used in the baseline emission calculation and the two new gas/oil boilers in the potential emissions that demonstrates a significant emission increase and a significant net emission increase of PE, PM<sub>10</sub>, SO<sub>2</sub>, NOx, VOC, and CO does not occur as a result of the Boiler Replacement Project. Note that the net SO<sub>2</sub> and NOx emissions are actually an emission decrease.

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### b State Only Enforceable Section

1. None

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- [Go to Part III for Emissions Unit B005](#)
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- [Go to Part III for Emissions Unit P002](#)

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1409010021 Emissions Unit ID: B004 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B004 - 28 MMBtu/hr natural gas and No.2 oil-fired boiler	OAC rule 3745-31-05(A)(3) (PTI14-1440)	See sections A.I.2.a, A.I.2.b, A.I.2.c, A.II.1 and A.II.2.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B)(1), OAC rule 3745-18-15(E)(2), and OAC rule 3745-21-08(B). Visible particulate emissions (PE) from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)	0.020 lb of PE/MMBtu of actual heat input.
	OAC rule 3745-18-15(E)(2)	Sulfur Dioxide (SO2) emissions shall not exceed 0.31 lb/MMBtu of actual heat input when burning No. 2 fuel oil.
	OAC 3745-21-08(B)	See section A.I.2.d.

2. Additional Terms and Conditions

- a. When burning No.2 fuel oil, the following emission limitations shall not be exceeded:

- (a)
  - 1.0 lbs of Carbon Monoxide (CO)/hour;
  - 0.14 lb of Nitrogen Oxides (NOx)/MMBtu of actual heat input;
  - 0.020 lb of PE and Particulate Matter 10 microns and less in diameter (PM10)/MMBtu of actual heat input;
  - 0.31 lb of Sulfur Dioxide (SO2)/MMBtu of actual heat input; and
  - 0.04 lb of Volatile Organic Compound (VOC)/hour.

The lb/MMBtu and pound(s) per hour emission limitations for CO, VOC, PE/PM10, and NOx, respectively, are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

- b. When burning only natural gas, the following emission limitations shall not be exceeded:

- 2.4 lbs of Carbon Monoxide (CO)/hour;
- 0.1 lb of Nitrogen Oxides (NOx)/MMBtu of actual heat input;
- 0.020 lb of PE and Particulate Matter 10 microns and less in diameter (PM10)/MMBtu of actual heat input;
- 0.0006 lb of Sulfur Dioxide (SO2)/MMBtu of actual heat input; and
- 0.16 lb of Volatile Organic Compound (VOC)/hour.

The lb/MMBtu and pound(s) per hour emission limitations for CO, VOC, PE/PM10, and NOx, respectively, are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

- c. The following emission limitations shall not be exceeded:

10.51 of Tons per year (TPY) CO;  
 17.8 TPY of NO<sub>x</sub>;  
 38.0 TPY of SO<sub>2</sub>;  
 2.5 TPY of PE/PM<sub>10</sub>; and  
 0.70 TPY of VOC.

The TPY emission limitations are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

- d. The permittee shall satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. On June 24, 2003, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

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#### II. Operational Restrictions

1. The quality of the No.2 fuel oil burned in this emissions unit shall have a combination of sulfur content and heat content sufficient to comply with the allowable SO<sub>2</sub> emission limitation of 0.31 pound SO<sub>2</sub>/MMBtu actual heat input.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

2. The permittee shall burn only natural gas and and No.2 fuel oil in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

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#### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

##### Alternative 1:

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

##### Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

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

(Authority for term: OAC rule 3745-77-07(C)(1) OAC rule 3745-31-05(A)(3), and OAC rule 3745-18-04(E))

2. For each day during which the permittee burns a fuel other than natural gas and/or No.2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-1440, issued on August 27, 2004: A.III.1 - A.II.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and

record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

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**IV. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record which shows a deviation from the allowable sulfur dioxide emission limitation contained in this permit, based upon the sulfur dioxide emission rates calculated in accordance with the formula specified in OAC rule 3745-18-04(F). The notification shall include a copy of such record and shall be sent to the director (the appropriate District Office or local air agency) within 45 days after the deviation occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any fuel burned in this emissions unit other than natural gas or Number 2 fuel oil. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-1440, issued on August 27, 2004 : A.IV.1-A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

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**V. Testing Requirements**

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

0.020 lb of PE/PM10/MMBtu of actual heat input when burning No. 2 fuel oil or natural gas; and  
2.5 TPY of PM/PM10.

Applicable compliance method when burning only natural gas:

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (MM cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs of filterable PE/MM cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Applicable compliance method when burning No.2 fuel oil:

For the use of no. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs of filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Compliance with the TPY annual emission limitation shall be assumed as long as compliance with the lb/MMBtu limitation is maintained.

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation above pursuant to OAC rule 3745-17-03(B)(9).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-10(B))

b. Emission Limitations:

SO2 emissions shall not exceed 0.31 lb/MMBtu of actual heat input when burning No.2 fuel oil.

SO2 emissions shall not exceed 0.0006 lb/MMBtu of actual heat input when burning natural gas.

38 TPY of SO2.

Applicable compliance method when burning No.2 fuel oil:

Compliance with the allowable sulfur dioxide emission limitation shall be based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments of oil received during the calendar month.

Applicable compliance method when burning natural gas:

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

of the emissions unit (MMBtu/hr).

Compliance with the TPY annual emission limitation shall be assumed as long as compliance with the lb/MMBtu limitation is maintained.

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

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(F), and OAC 3745-31-05(C))

c. Emission Limitations:

NOx emissions shall not exceed 0.14 lb/MMBtu of actual heat input when burning only No.2 fuel oil.

NOx emissions shall not exceed 0.1 lb/MMBtu of actual heat input when burning only natural gas.

17.8 TPY of NOx.

Applicable compliance method when burning only natural gas:

For the use of natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (MM cu.ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emission factor of 100 lbs of NOx/MM cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Applicable compliance method when No.2 fuel oil:

For the use of No.2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 20 lbs of NOx/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/MMBtu limitation is maintained.

If required, the permittee shall demonstrate compliance with the lb/MMBtu limitations in accordance with Method 7, 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitations:

CO emissions shall not exceed 2.4 lbs/hour when burning only natural gas.

CO emissions shall not exceed 1.0 lbs/hour when burning No.2 fuel oil.

10.51 TPY of CO.

Applicable compliance method when burning only natural gas:

For the use of natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (MM cu.ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emission factor of 84 lbs of CO/MM cu. ft of natural gas.

Applicable compliance method when burning No.2 fuel oil:

For the use of No.2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 5 lbs of CO/1000 gallons of fuel oil.

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/MMBtu and pounds per hour limitations are maintained.

If required, the permittee shall demonstrate compliance with the lb/MMBtu and pounds per hour emission limitations in accordance with Method 10, 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

e. Emission Limitations:

VOC emissions shall not exceed 0.16 lb/hour when burning only natural gas.

VOC emissions shall not exceed 0.04 lb/hour when burning No.2 fuel oil.

0.7 TPY of VOC.

Applicable compliance method when burning natural gas:

For the use of natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (MM cu.ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emission factor of 5.5 lbs of VOC/MM cu. ft of natural gas.

Applicable compliance method when burning No.2 fuel oil:

For the use of No.2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 0.2 lb of VOC/1000 gallons of fuel oil.

Compliance with the annual emission limitation shall be assumed as long as compliance with the lb/MMBtu and pound per hour limitations are maintained.

If required, the permittee shall demonstrate compliance with the pound per hour limitations in accordance with Method 25, 40 CFR, Part 60, Appendix A.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- f. Emission Limitation:  
Visible particulate emissions (PE) from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:  
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- 2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-1440, issued on August 27, 2004: A.V.1.a. - A.V.1.f. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1409010021 Emissions Unit ID: B004 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B004 - 28 MMBtu/hr natural gas and No.2 oil-fired boiler		

2. **Additional Terms and Conditions**

None

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II. **Operational Restrictions**

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

- 1. None

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IV. **Reporting Requirements**

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V. **Testing Requirements**

None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1409010021 Emissions Unit ID: B005 Issuance type: Title V Preliminary Proposed Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B005 - 72 MMBtu/hr natural gas and No.2 oil-fired boiler	OAC rule 3745-31-05(A)(3) (PTI14-04175)	See sections A.I.2.a, A.I.2.b, A.I.2.c, A.II.1 and A.II.2.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart Dc and OAC rule 3745-21-08(B).
	OAC rule 3745-17-10(B)	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-18-06	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC 3745-21-08(B) 40 CFR Part 60, Subpart Dc	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See section A.I.2.d. Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

2. **Additional Terms and Conditions**

a. When burning No.2 fuel oil, the following emission limitations shall not be exceeded:

- (a)
- 0.16 lb of Carbon Monoxide (CO)/MMBtu of actual heat input;
  - 0.18 lb of Nitrogen Oxides (NOx)/MMBtu of actual heat input;
  - 0.02 lb of PE and Particulate Matter 10 microns and less in diameter (PM10)/MMBtu of actual heat input;
  - 0.31 lb of Sulfur Dioxide (SO2)/MMBtu of actual heat input; and
  - 0.025 lb of Volatile Organic Compound (VOC) /MMBtu of actual heat input.

The lb/MMBtu emission limitations for CO, VOC, PE/PM10, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

- b. When burning only natural gas, the following emission limitations shall not be exceeded:
- 0.16 lb of Carbon Monoxide (CO)/MMBtu of actual heat input;
  - 0.10 lb of Nitrogen Oxides (NOx)/MMBtu of actual heat input;
  - 0.01 lb of PE and Particulate Matter 10 microns and less in diameter (PM10)/MMBtu of actual heat input;
  - 0.001 lb of Sulfur Dioxide (SO2)/MMBtu of actual heat input; and
  - 0.016 lb of Volatile Organic Compound (VOC) /MMBtu of actual heat input.

The lb/MMBtu emission limitations for CO, VOC, PE/PM10, SO2, and NOx are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

- c. The following emission limitations shall not be exceeded:
- 50.5 TPY of CO;
  - 56.8 TPY of NOx;
  - 97.8 TPY of SO2;
  - 6.3 TPY of PE/PM10; and
  - 7.9 TPY of VOC.

The TPY emission limitations are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

- d. The permittee shall satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. On June 24, 2003, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

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#### II. Operational Restrictions

1. The quality of number 2 fuel oil received for burning in this emissions unit shall have a combination of sulfur content and heat content sufficient to comply with the allowable sulfur dioxide emission limitation of 0.31 lb/mmBtu of actual heat input and a sulfur content limit of less than or equal to 0.3 percent sulfur by weight.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

2. The permittee shall burn only natural gas and and No.2 fuel oil in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

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#### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

##### Alternative 1:

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

##### Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat

content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

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

(Authority for term: OAC rule 3745-77-07(C)(1) OAC rule 3745-31-05(A)(3), and OAC rule 3745-18-04(E))

2. For each day during which the permittee burns a fuel other than natural gas and/or No.2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-04175, issued on October 24, 2006: A.III.1 - A.II.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

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#### IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record which shows a deviation from the allowable sulfur dioxide emission limitation contained in this permit, based upon the sulfur dioxide emission rates calculated in accordance with the formula specified in OAC rule 3745-18-04(F). The notification shall include a copy of such record and shall be sent to the director (the appropriate District Office or local air agency) within 45 days after the deviation occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any fuel burned in this emissions unit other than natural gas or Number 2 fuel oil. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-04175, issued on October 24, 2006: A.IV.1-A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

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#### V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

0.02 lb of PE/PM10/MMBtu of actual heat input when burning No. 2 fuel oil;  
0.01 lb of PE/PM10/MMBtu of actual heat input when burning natural gas; and  
6.3 TPY of PM/PM10.

For the use of natural gas, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

For the use of number 2 fuel oil, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emissions data as provided in PTI application 14-04175 submitted on May 29, 1996.

Compliance with the 6.3 TPY annual emission limitation is demonstrated by multiplying the maximum short term emission limitation of 0.02 lb of PE/PM10 per MMBtu by the maximum design capacity of the emissions unit (72 MMBtu/hr) multiplied by 8760 hours per year and divided by 2000 lbs per ton.

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 4, and 5.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-10(B))

- b. Emission Limitations:  
SO<sub>2</sub> emissions shall not exceed 0.31 lb/MMBtu of actual heat input when burning No.2 fuel oil.  
SO<sub>2</sub> emissions shall not exceed 0.001 lb/MMBtu of actual heat input when burning natural gas.  
97.8 TPY of SO<sub>2</sub>.  
Applicable compliance method:  
For the use of natural gas, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.  
For the use of number 2 fuel oil, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.  
If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 6.  
Compliance with the 97.8 TPY annual emission limitation is demonstrated by multiplying the maximum short term emission limitation of 0.31 lb of SO<sub>2</sub> per MMBtu by the maximum design capacity of the emissions unit (72 MMBtu/hr) multiplied by 8760 hours per year and divided by 2000 lbs per ton.  
(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(F), and OAC 3745-31-05(C))
- c. Emission Limitations:  
NO<sub>x</sub> emissions shall not exceed 0.18 lb/MMBtu of actual heat input when burning only No.2 fuel oil.  
NO<sub>x</sub> emissions shall not exceed 0.1 lb/MMBtu of actual heat input when burning only natural gas.  
56.8 TPY of NO<sub>x</sub>.  
Applicable compliance method:  
For the use of natural gas, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.  
For the use of number 2 fuel oil, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.  
If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 7.  
Compliance with the 56.8 TPY annual emission limitation is demonstrated by multiplying the maximum short term emission limitation of 0.18 lb of NO<sub>x</sub> per MMBtu by the maximum design capacity of the emissions unit (72 MMBtu/hr) multiplied by 8760 hours per year and divided by 2000 lbs per ton.  
(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
- d. Emission Limitations:  
CO emissions shall not exceed 0.16 lb/MMBtu of actual heat input when burning only natural gas.  
CO emissions shall not exceed 0.16 lb/MMBtu of actual heat input when burning NO.2 fuel oil.  
50.5 TPY of CO.  
Applicable compliance methods:  
For the use of natural gas, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.  
For the use of number 2 fuel oil, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.  
If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 10.  
Compliance with the 50.5 TPY annual emission limitation is demonstrated by multiplying the maximum short term emission limitation of 0.16 lb of CO per MMBtu by the maximum design capacity of the emissions unit (72 MMBtu/hr) multiplied by 8760 hours per year and divided by 2000 lbs per ton.  
(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))
- e. Emission Limitations:  
VOC emissions shall not exceed 0.016 lb/MMBtu of actual heat input when burning only natural gas.  
VOC emissions shall not exceed 0.025 lb/MMBtu of actual heat input when burning NO.2 fuel oil.  
7.9 TPY of VOC.  
Applicable compliance method:

For the use of natural gas, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

For the use of number 2 fuel oil, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

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

Compliance with the 7.9 TPY annual emission limitation is demonstrated by multiplying the maximum short term emission limitation of 0.025 lb of VOC per MMBtu by the maximum design capacity of the emissions unit (72 MMBtu/hr) multiplied by 8760 hours per year and divided by 2000 lbs per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- f. Emission Limitation:  
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method:  
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- 2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-04175, issued on October 24, 2006: A.V.1.a. - A.V.1.f. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1409010021 Emissions Unit ID: B005 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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B005 - 72 MMBtu/hr natural gas and No.2 oil-fired boiler		
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- 2. **Additional Terms and Conditions**

None

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II. **Operational Restrictions**

None

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

1. None

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IV. **Reporting Requirements**

None

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V. **Testing Requirements**

None

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1409010021 Emissions Unit ID: B006 Issuance type: Title V Preliminary Proposed Permit**

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B006 - 72 MMBtu/hr natural gas and No.2 oil-fired boiler	OAC rule 3745-31-05(A)(3) (PTI14-04175)	See sections A.I.2.a, A.I.2.b, A.I.2.c, A.II.1 and A.II.2.
	OAC rule 3745-17-07(A)	The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart Dc and OAC rule 3745-21-08(B).
	OAC rule 3745-17-10(B)	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-18-06	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC 3745-21-08(B)	The emission limitation specified by this rule is the same as or less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See section A.I.2.d.

40 CFR Part 60, Subpart Dc

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

2. **Additional Terms and Conditions**

- a. When burning No.2 fuel oil, the following emission limitations shall not be exceeded:

(a)

0.16 lb of Carbon Monoxide (CO)/MMBtu of actual heat input;  
0.18 lb of Nitrogen Oxides (NO<sub>x</sub>)/MMBtu of actual heat input;  
0.02 lb of PE and Particulate Matter 10 microns and less in diameter (PM<sub>10</sub>)/MMBtu of actual heat input;  
0.31 lb of Sulfur Dioxide (SO<sub>2</sub>)/MMBtu of actual heat input; and  
0.025 lb of Volatile Organic Compound (VOC) /MMBtu of actual heat input.

The lb/MMBtu emission limitations for CO, VOC, PE/PM<sub>10</sub>, and NO<sub>x</sub> are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

- b. When burning only natural gas, the following emission limitations shall not be exceeded:

0.16 lb of Carbon Monoxide (CO)/MMBtu of actual heat input;  
0.10 lb of Nitrogen Oxides (NO<sub>x</sub>)/MMBtu of actual heat input;  
0.01 lb of PE and Particulate Matter 10 microns and less in diameter (PM<sub>10</sub>)/MMBtu of actual heat input;  
0.001 lb of Sulfur Dioxide (SO<sub>2</sub>)/MMBtu of actual heat input; and  
0.016 lb of Volatile Organic Compound (VOC) /MMBtu of actual heat input.

The lb/MMBtu emission limitations for CO, VOC, PE/PM<sub>10</sub>, SO<sub>2</sub>, and NO<sub>x</sub> are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

- c. The following emission limitations shall not be exceeded:

50.5 TPY of CO;  
56.8 TPY of NO<sub>x</sub>;  
97.8 TPY of SO<sub>2</sub>;  
6.3 TPY of PE/PM<sub>10</sub>; and  
7.9 TPY of VOC.

The TPY emission limitations are based on the emissions unit's potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

- d. The permittee shall satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. On June 24, 2003, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

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II. **Operational Restrictions**

1. The quality of number 2 fuel oil received for burning in this emissions unit shall have a combination of sulfur content and heat content sufficient to comply with the allowable sulfur dioxide emission limitation of 0.31 lb/mmBtu of actual heat input and a sulfur content limit of less than or equal to 0.3 percent sulfur by weight.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

2. The permittee shall burn only natural gas and and No.2 fuel oil in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

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

1. The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated

sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

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

(Authority for term: OAC rule 3745-77-07(C)(1) OAC rule 3745-31-05(A)(3), and OAC rule 3745-18-04(E))

2. For each day during which the permittee burns a fuel other than natural gas and/or No.2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-04175, issued on October 24, 2006: A.III.1 - A.II.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

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#### IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record which shows a deviation from the allowable sulfur dioxide emission limitation contained in this permit, based upon the sulfur dioxide emission rates calculated in accordance with the formula specified in OAC rule 3745-18-04(F). The notification shall include a copy of such record and shall be sent to the director (the appropriate District Office or local air agency) within 45 days after the deviation occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any fuel burned in this emissions unit other than natural gas or Number 2 fuel oil. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-04175, issued on October 24, 2006: A.IV.1-A.IV.2. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

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#### V. Testing Requirements

1. Compliance with the emission limitations in section A.1.1 of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitations:
    - 0.02 lb of PE/PM10/MMBtu of actual heat input when burning No. 2 fuel oil;
    - 0.01 lb of PE/PM10/MMBtu of actual heat input when burning natural gas; and
    - 6.3 TPY of PM/PM10.

For the use of natural gas, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

For the use of number 2 fuel oil, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

Compliance with the 6.3 TPY annual emission limitation is demonstrated by multiplying the maximum short term emission limitation of 0.02 lb of PE/PM10 per MMBtu by the maximum design capacity of the emissions unit (72 mmBtu/hr) multiplied by 8760 hours per year and divided by 2000 lbs per ton.

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 5.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-10(B))

b. Emission Limitations:

SO2 emissions shall not exceed 0.31 lb/MMBtu of actual heat input when burning No.2 fuel oil.

SO2 emissions shall not exceed 0.001 lb/MMBtu of actual heat input when burning natural gas.

97.8 TPY of SO2.

Applicable compliance method:

For the use of natural gas, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

For the use of number 2 fuel oil, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

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

Compliance with the 97.8 TPY annual emission limitation is demonstrated by multiplying the maximum short term emission limitation of 0.31 lb of SO2 per MMBtu by the maximum design capacity of the emissions unit (72 MMBtu/hr) multiplied by 8760 hours per year and divided by 2000 lbs per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(F), and OAC 3745-31-05(C))

c. Emission Limitations:

NOx emissions shall not exceed 0.18 lb/MMBtu of actual heat input when burning only No.2 fuel oil.

NOx emissions shall not exceed 0.1 lb/MMBtu of actual heat input when burning only natural gas.

56.8 TPY of NOx.

Applicable compliance method:

For the use of natural gas, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

For the use of number 2 fuel oil, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

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

Compliance with the 56.8 TPY annual emission limitation is demonstrated by multiplying the maximum short term emissions limitation of 0.18 lb of NOx per MMBtu by the maximum design capacity of the emissions unit (72 MMBtu/hr) multiplied by 8760 hours per year and divided by 2000 lbs per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

d. Emission Limitations:

CO emissions shall not exceed 0.16 lb/MMBtu of actual heat input when burning only natural gas.

CO emissions shall not exceed 0.16 lb/MMBtu of actual heat input when burning NO.2 fuel oil.

50.5 TPY of CO.

Applicable compliance methods:

For the use of natural gas, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

For the use of number 2 fuel oil, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

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

Compliance with the 50.5 TPY annual emission limitation is demonstrated by multiplying the maximum

short term emission limitation of 0.16 lb of CO per MMBtu by the maximum design capacity of the emissions unit (72 MMBtu/hr) multiplied by 8760 hours per year and divided by 2000 lbs per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

e. Emission Limitations:

VOC emissions shall not exceed 0.016 lb/MMBtu of actual heat input when burning only natural gas.

VOC emissions shall not exceed 0.025 lb/MMBtu of actual heat input when burning NO.2 fuel oil.

7.9 TPY of VOC.

Applicable compliance method:

For the use of natural gas, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

For the use of number 2 fuel oil, the short term emission limitation is based upon the emissions unit's potential to emit and the manufacturer's guaranteed emission data as provided in PTI application 14-04175 submitted on May 29, 1996.

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

Compliance with the 7.9 TPY annual emission limitation is demonstrated by multiplying the maximum short term emissions limitation of 0.025 lb of VOC per MMBtu by the maximum design capacity of the emissions unit (72 MMBtu/hr) multiplied by 8760 hours per year and divided by 2000 lbs per ton.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

f. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install 14-04175, issued on October 24, 2006: A.V.1.a. - A.V.1.f. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1409010021 Emissions Unit ID: B006 Issuance type: Title V Preliminary Proposed Permit

B. State Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or

control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B006 - 72 MMBtu/hr natural gas and No.2 oil-fired boiler		

2. **Additional Terms and Conditions**

None

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II. **Operational Restrictions**

None

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

1. None

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IV. **Reporting Requirements**

None

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V. **Testing Requirements**

None

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1409010021 Emissions Unit ID: P002 Issuance type: Title V Preliminary Proposed Permit

A. State and Federally Enforceable Section

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - No. 6 paper machine with paper coater	OAC rule 3745-31-05(C) (PTI 14-03951)	See terms A.I.2.a and A.II.1 and A.II.2 below.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).

OAC rule 3745-21-09(F)

The surface coatings employed at the paper-coating section shall not exceed 2.9 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents.

OAC rule 3745-21-07(G)(2)

8 lbs of organic compounds (OC)/hour and 40 lbs of OC/day on any days where photochemically reactive materials are used.

**2. Additional Terms and Conditions**

a. The OC emissions from this emissions unit shall not exceed the following for paper making and paper coating combined:

(a)

476.4 pounds per day\*; and  
38.74 tons per year (TPY), based upon a rolling, 12-month summation.

\*The daily OC emission limitation is based on the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with this limitation.

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**II. Operational Restrictions**

1. The percent by weight of organic compounds in the total annual material usage shall not exceed the following:

Paper-making (Wet End) 2.0  
Film Forming (Paper Coating) 0.054  
Primer Coating (Paper Coating) 0.215  
Top Coating (Paper Coating) 0.120

The percent by weight of organic compound limitations specified above may be exceeded as long as the emission limitations specified in A.I.2.a are not exceeded.

2. The total annual material usage in pounds, based on a rolling, 12-month summation, shall not exceed the following:

Paper-making (Wet End) 8,640,000  
Film Forming (Paper Coating) 25,200,000  
Primer Coating (Paper Coating) 11,400,000  
Top Coating (Paper Coating) 16,800,000

The annual usage limitations specified above may be exceeded as long as the emission limitations specified in A.I.2.a are not exceeded.

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

1. The permittee shall maintain monthly records which list the following information for each surface coating and chemical material employed in paper-making, film forming, primer coating and top coating:

- a. the company identification, and type (Paper-making, Film Forming, Paper Coating, or Top Coating) of each surface coating and chemical material;
- b. the amount of each coating and chemical material employed, in pounds;
- c. the OC content, in pounds of OC per gallon of coating, excluding water and exempt solvents, for each surface coating used for paper coating;
- d. the percent by weight of OC for each coating and/or chemical material employed;
- e. the total monthly usage of coatings and/or chemicals employed for each of the following operations: paper-making, film forming, primer coating and top coating;
- f. the monthly OC emissions calculated by taking the summation of (b) times (d) for the Film Forming, Primer Coating, and Top Coating operations. The OC emissions from the Paper Making Operation shall be calculated at an 11.1 % evaporation rate, ie  $((b) \times (d)) \times (1 - .111)$ .
- g. The updated rolling, 12-month usage summation of coatings and/or chemicals employed for each of the following operations: paper-making, film forming, primer coating and top coating (the summation of the usages in (e) for the current month and the preceding eleven months).
- h. The updated rolling, 12-month total OC emissions (the summation of the OC emissions in (f) for the current month and the preceding eleven months).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(C))

2. The permittee shall maintain daily records which list the following information for each surface coating and chemical material employed in paper-making, film formers, primer coating and top coating on any day when photochemically reactive materials are used:

- a. the company identification for each coating and photochemically reactive cleanup material employed;
- b. the number of gallons of each coating and photochemically reactive cleanup material employed;
- c. the organic compound content of each coating and photochemically reactive cleanup material, in pounds per gallon;
- d. for each day during which a photochemically reactive material is employed, the total organic compound

emission rate for all coatings and photochemically reactive cleanup materials, in pounds per day;

e. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and

f. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all coatings and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit. Also, the definitions of "photochemically reactive" and "nonphotochemically reactive" are based upon OAC rule 3745-21-01(C)(5).]

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(C))

3. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install 14-03961, issued on May 30, 1996: A.III.1 - A.III.2. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

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#### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports for any exceedance of the annual OC emission limitation specified in A.I.2.a.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(C))

2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(C))

3. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. for the days during which a photochemically reactive material was employed, an identification of each hour during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual organic compound emissions for each such hour; and

b. for the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(C))

4. The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(C))

5. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install 14-03951, issued on May 30, 1996: A.IV.1-A.IV.4 The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

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#### V. Testing Requirements

1. Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
  - 476.4 pounds OC/day\*; and
  - 38.74 TPY of OC based on a rolling 12-month summation.

Applicable Compliance Method:

The TPY of OC emission rate shall be determined by the information collected and recorded in A.III.1.h. The lbs of OC/day emission limitation is based on the emissions unit's potential to emit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(C))

- b. Emission Limitation:  
8 lbs OC per hour, 40 lbs OC per day on any day where photochemically reactive materials are used.  
  
Applicable Compliance Method:  
The hourly and daily OC emission rate shall be demonstrated by the information collected and recorded in A.III.2.  
  
(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(C))
  - c. Compliance with the OC content limitations in Term A.II.1 shall be demonstrated by the monitoring and record keeping in Term A.III.1.d  
  
(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(C))
  - d. Compliance with the usage limitations in Term A.II.2 shall be demonstrated by the monitoring and record keeping in Term A.III.1.g  
  
(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(C))
  - e. USEPA Methods 24 shall be used to determine the VOC content for coatings employed. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.  
  
(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-10(B), and OAC rule 3745-31-05(C))
2. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-03951, issued on May 30, 1996: A.V.1.a through A.V1.e. The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.  
  
(Authority for term: OAC rule 3745-77-07(A)(3)(a)(ii))

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VI. **Miscellaneous Requirements**

- 1. None

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Facility ID: 1409010021 Emissions Unit ID: P002 Issuance type: Title V Preliminary Proposed Permit

**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

- 1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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P002 - No. 6 paper machine with paper coater		
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- 2. **Additional Terms and Conditions**

1. None

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II. **Operational Restrictions**

1. None

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

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None