

Facility ID: 1409010043 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. None

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b State Only Enforceable Section

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

T010 (2) 3,000-gallon Wet Strength Resin Tanks (SORG);
 T011 2,000-gallon Wet Strength Resin (Melamine) Tank (SORG);
 T012 3,000-gallon Wet Strength Resin (Melamine) Tank (SORG);
 T013 1,500-gallon Dye Fixative Tank (SORG);
 T014 300-gallon Dye Fixative Make-up Tank (SORG);
 T015 300-gallon Retension Aid Tank (SORG);
 T016 500-gallon Retension Aid Tank (SORG);
 T017 5,000-gallon Size (Internal) Tank (SORG);
 T018 3,000-gallon Topsize Starch Tank (SORG);
 T019 900-gallon Size Tank (SORG);
 T020 (2) 600-gallon Size Tanks (SORG);
 T021 300-gallon Top Size Tank (SORG);
 T022 1,000-gallon Cleaner Tank (SORG);
 T023 5,000-gallon Wet Strength Resin (Melamine) Tank (SORG);
 T024 (2) 2,000-gallon Wet Strength Resin (Melamine) Tanks (SORG);
 T025 500-gallon Polymer Tank (SORG);
 T026 200-gallon Polymer Tank (SORG);
 T027 3,000-gallon Alum Tank (SORG);
 T028 300-gallon Gasoline Tank (SORG);
 T029 1,000-gallon Propane Tank (SORG);
 T030 300-gallon Kerosene Tank (SORG);
 T031 5,000-gallon Alum Tank (SORG);
 T032 3,000-gallon Dilute Alum Tank (SORG);
 T033 1,000-gallon Alum Tank (SORG);
 T034 Miscellaneous Mix Tanks (SORG);
 T036 3,000-gallon Beater Starch Tank (SORG);
 T037 5,500-gallon Dilute Alum Tank (SORG);
 T038 500-gallon Wet Strength Resin (Melamine) Tank (SORG);
 T039 900-gallon Size Tank (SORG);
 T040 300-gallon Wash-up Tank (SORG);
 Z010 Starch Tile Chest (SORG);
 Z017 Miscellaneous Portable Totes (SORG);
 Z019 (2) 30-gallon, and (1) 20-gallon Parts Washers (SORG);
 Z021 No. 1 Hydropulpers (SORG);
 Z022 No. 3 Hydropulpers (SORG);
 Z023 No. 4 Hydropulpers (SORG);
 Z024 Sorg WWTP (SORG);
 Z025 Gasoline Tank with Dispenser (SORG);
 Z026 Diesel Tank with Dispenser (SORG); and
 Z029 (3) Laboratory Hoods (SORG).

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.

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1409010043 Emissions Unit ID: F001 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>
Sorg paved roadways and parking areas (see Section A.I.2.a)	OAC rule 3745-17-07(B)(4)	There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed six minutes during any sixty-minute observation period. reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.I.2.c, and A.I.2.e through A.I.2.i)
	OAC rule 3745-17-08(B), (B)(8), (B)(9)	
Sorg unpaved roadways and parking areas (see Section A.I.2.b)	OAC rule 3745-17-07(B)(5)	There shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed thirteen minutes during any sixty-minute observation period. reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.I.2.d through A.I.2.i)
	OAC rule 3745-17-08(B), (B)(2)	

2. Additional Terms and Conditions

- a. The paved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

(a)

paved roadways:

Rear Dock Driveway
Mill 1 West Road

paved parking area:

Front Parking Lot

- b. The unpaved roadways and parking areas that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

unpaved roadways:

Sorg Alley Road
Lagoon Access Roadways

unpaved parking areas:

Mill 2 Stock Shed Area

- c. The permittee shall employ reasonably available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat all roadways and parking areas by sweeping 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.

- d. The permittee shall employ reasonably available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas by watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- e. 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 a paved or unpaved 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. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.
- f. Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure(s) specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- g. 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.
- h. 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.
- i. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

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II. Operational Restrictions

- 1. None

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III. Monitoring and/or Record Keeping Requirements

- 1. Except as otherwise provided in this section, the permittee shall perform inspections of the unpaved roadways and parking areas in accordance with the following frequencies:

Unpaved & Paved Roadways Minimum Inspection Frequency

Rear Dock Driveway daily, excluding weekends or holidays, for each day the roadway is used
 Sorg Alley Road daily, excluding weekends or holidays, for each day the roadway is used
 Mill 1 West Road daily, excluding weekends or holidays, for each day the roadway is used
 Lagoon Access Roadways daily, excluding weekends or holidays, for each day the roadway is used

Unpaved & Paved Parking Areas Minimum Inspection Frequency

Front Parking Lot daily, excluding weekends or holidays, for each day the parking lot is used
 Mill 2 Stock Shed Area daily, excluding weekends or holidays, for each day the parking lot is used

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.

The permittee may, upon receipt of written approval from the Hamilton County Department of Environmental Services, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.

- 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 may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
4. 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 where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.

The information required in 4.d. shall be kept separately for (i) the paved roadways and parking areas and (ii) the unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Compliance with the emission limitations for the unpaved and paved roadways and parking areas identified 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 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.

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1409010043 Emissions Unit ID: F001 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> |
|----|---|--------------------------------------|--|
| 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

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1409010043 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>
1.	Mikropul 16-8-220 car unload system - bulk starch handling with baghouse	OAC rule 3745-17-07(A) OAC rule 3745-17-11(B)(1) (Table I)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule. 25.2 lbs of particulate emissions (PE)/hr
2.	Additional Terms and Conditions		
(a)	None		

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II. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the range of 3 to 6 inches of water while the emissions unit is in operation.

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

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IV. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Emission Limitation:
25.2 lbs of PE/hr

Applicable Compliance Method:
Compliance with this emission limitation can be determined by multiplying the maximum capacity of the equipment (30,000 lbs/hr) by the emission factor of 0.27 lb PM-PM10/ton (from AP-42 Table 11.12-2, Pneumatic transfer of Portland Cement with fabric filter, 1/95) and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 5 and procedures specified in OAC rule 3745-17-03(B)(10).
2. Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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VI. Miscellaneous Requirements

1. None

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Facility ID: 1409010043 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>
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

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Facility ID: 1409010043 Emissions Unit ID: P003 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>
SEMCO DCT-70 silo unloader - starch slurry system with baghouse	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average,

OAC rule 3745-17-11(B)(1) except as specified by rule.
(Table I) 4.1 lbs of particulate emissions (PE)/hr

2. **Additional Terms and Conditions**

- (a) None

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II. **Operational Restrictions**

1. The pressure drop across the baghouse shall be maintained within the range of 3 to 6 inches of water while the emissions unit is in operation.

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

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.

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IV. **Reporting Requirements**

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

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V. **Testing Requirements**

1. Emission Limitation:
4.1 lbs of PE/hr
- Applicable Compliance Method:
Compliance with this emission limitation can be determined by multiplying the maximum capacity of the equipment (2,000 lbs/hr) by the emission factor of 2.2 lbs PM-PM10/ton (from AP-42 Table 11.17-4, Product Transfer and Conveying of Lime, 2/98) multiplying by a conservative 90% control efficiency for the baghouse (1-0.90) and dividing by 2000 lbs/ton.
- If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 5 and procedures specified in OAC rule 3745-17-03(B)(10).
2. Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as provided by rule.
- Applicable Compliance Method:
If required, compliance shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1409010043 Emissions Unit ID: P003 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>
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

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Facility ID: 1409010043 Issuance type: Title V Preliminary Proposed Permit

Part III - Terms and Conditions for Emissions Units

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Facility ID: 1409010043 Emissions Unit ID: P004 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>
Sorg paper machine No. 1	OAC rule 3745-31-05(A)(3) (PTI 14-4683)	See sections A.I.2.a through A.I.2.d.
	OAC rule 3745-21-07(G)	None. See section A.II.1.

2. **Additional Terms and Conditions**

- a. The organic compound (OC) emissions shall not exceed 521.1* pounds per day and 48 tons per year as a rolling, 12-month summation.
- (a) *This emission limitation is based on the emissions unit's potential to emit. Therefore, no additional record keeping, reporting, or compliance requirements are necessary to demonstrate compliance with this emission limitation.
- b. The formaldehyde content of the Formaldehyde Wet-Strength Resin (FWSR) shall not exceed 7 percent, by weight, on a wet basis.
- c. The methanol content of the FWSR shall not exceed 1.9 percent, by weight, on a wet basis.
- d. The total OC emitted from dyes shall not exceed 2.18 pounds per air-dried ton of finished product (ADTFP).

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II. **Operational Restrictions**

1. To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G)(2), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

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

1. The permittee shall collect and record the following information each calendar month for this emissions unit:
 - a. The total FWSR grade production, in ADTFP.
 - b. The total non-FWSR grade production, in ADTFP.
 - c. The weight percent formaldehyde of each FWSR, on a wet basis.
 - d. The weight percent methanol of each FWSR, on a wet basis.
 - e. The monthly OC emissions (excluding emissions from use of dyes) calculated according to the following equation:

Monthly OC emissions (excluding emissions from the use of dyes), in lbs/month

$$= A * B + C * D$$

where:

- A = total non-FWSR grade production (ADTFP/month)
- B = non-FWSR OC emission factor = 0.488 lb OC/ADTFP
- C = total FWSR grade production (ADTFP/month)
- D = FWSR OC emission factor = [2.9* + 0.488] lbs OC/ADTFP

*This portion of the emission factor for FWSR (2.9 lbs OC/ADTFP) is based on 7 percent, by weight, formaldehyde (wet basis) and 1.9 percent, by weight, methanol (wet basis) in the resin.

The emission factors above are based on information submitted in PTI application 14-4683.

- f. The amount of each dye used, in pounds.
- g. The weight percent OC content of each dye used.
- h. The OC emissions from the use of dyes, calculated as the sum of (f) multiplied by (g) for all dyes used during the calendar month, in pounds.
- i. The OC emissions from dyes, in pounds OC/ADTFP, calculated as (h) divided by (a) + (b) for the calendar month.

- j. The total monthly OC emissions, calculated as the sum of (e) and (h), in pounds.
 - k. The rolling, 12-month summation of OC emissions, calculated by adding the OC emissions of the current month to the OC emissions of the preceding 11 calendar months, in tons.
- 2. The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.

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IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. Any exceedance of the emission limitation of 48 tons OC per year as a rolling, 12-month summation.
 - b. Any exceedance of the formaldehyde content limitation of 7 percent, by weight, on a wet basis.
 - c. Any exceedance of the methanol content limitation of 1.9 percent, by weight, on a wet basis.
 - d. Any exceedance of the emission limitation of 2.18 pounds OC/ADTFP.
- 2. The permittee shall submit deviation (excursion) reports that identify all periods of time when a photochemically reactive material is employed in this emissions unit. These reports shall be submitted within 30 days after the occurrence.
- 3. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

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V. Testing Requirements

- 1. Compliance with the OC emission limitations and the FWSR formaldehyde and methanol content requirements specified in section A.I.2 shall be demonstrated based upon the records required pursuant to section A.III.1.
- 2. Formulation data shall be used to determine the OC content of the dyes employed in this emissions unit.

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VI. Miscellaneous Requirements

- 1. None

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Facility ID: 1409010043 Emissions Unit ID: P004 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>
Sorg paper machine No. 1		
2. Additional Terms and Conditions		
a.	For the purpose of establishing a historical facility-wide annual Formaldehyde Wet-Strength Resin (FWSR) usage limitation to demonstrate that the Ohio EPA's Air Toxic Policy does not apply to this emissions	

unit, the permittee agrees to limit its annual FWSR usage to 4,032,680 wet pounds per year as a rolling, 12-month summation for emissions units P004, P005 and P006 combined. The permittee has prior records to demonstrate compliance with the rolling, 12-month summation limitation.

- b. The permittee has agreed to limit emissions of diethylene glycol butyl ether, triethanolamine and diethanolamine to less than one ton per year each to avoid the air toxics policy. The permittee shall maintain annual records of the amount of diethylene glycol butyl ether, triethanolamine and diethanolamine emitted from the use of dyes.

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each calendar month:
- The total FWSR usage, in wet pounds, for emissions units P004, P005 and P006 combined.
 - The rolling, 12-month summation of the FWSR usage, calculated by adding the FWSR usage from the current month to the FWSR usage of the preceding 11 calendar months for emissions units P004, P005 and P006 combined.

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IV. Reporting Requirements

1. The permittee shall submit annual reports that specify the rolling, 12-month summation of the total FWSR usage for emissions units P004, P005 and P006 for each calendar month during the previous calendar year. These reports shall be submitted by January 31 of each year.

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V. Testing Requirements

1. None

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VI. Miscellaneous Requirements

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than one ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above one ton per year may require the permittee to apply for and obtain a new permit to install.

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Facility ID: 1409010043 Emissions Unit ID: P005 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>
paper machine No. 3 (SORG)	OAC rule 3745-21-07(G)(2)	See section A.I.2.
2. Additional Terms and Conditions		
a.	This emissions unit does not currently employ photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). This emissions unit is exempt from the emission limitations/control requirements specified in OAC rule 3745-21-07(G)(2) on any day during which only non-photochemically reactive materials are employed.	
b.	On any day during which photochemically reactive materials are employed in this emissions unit, the organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day.	

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II. Operational Restrictions

1. None

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III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day:
- the company identification of each organic material employed in this emissions unit;
 - a record for each organic material employed, indicating whether or not the organic material is a photochemically reactive material;
 - the number of gallons of each organic material employed;
 - the OC content of each organic material, in pounds per gallon;
 - for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all organic materials, in pounds per day;
 - for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
 - for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all organic materials, i.e., (e)/(f), in pounds per hour (average).

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IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
- for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly organic compound emissions for each such day.
 - 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 lbs/day, and the actual organic compound emissions for each such day.

The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

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V. Testing Requirements

1. Emission Limitations:
8 lbs of OC/hr and 40 lbs of OC/day
- Applicable Compliance Method:
Compliance with these emission limitations shall be determined based upon the records required pursuant to section A.III. If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.
2. The permittee shall use formulation data to determine the OC content of each organic material employed in

this emissions unit.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1409010043 Emissions Unit ID: P005 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>
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

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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.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
paper machine No. 4 (SORG)	OAC rule 3745-21-07(G)(2)	See section A.I.2.
2. Additional Terms and Conditions		
a. This emissions unit does not currently employ photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). This emissions unit is exempt from the emission limitations/control requirements specified in OAC rule 3745-21-07(G)(2) on any day during which only non-photochemically reactive materials are employed.		
b. On any day during which photochemically reactive materials are employed in this emissions unit, the organic compound (OC) emissions shall not exceed 8 lbs/hr and 40 lbs/day.		

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1. None

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1. The permittee shall collect and record the following information for each day:
 - a. the company identification of each organic material employed in this emissions unit;
 - b. a record for each organic material employed, indicating whether or not the organic material is a photochemically reactive material;
 - c. the number of gallons of each organic material employed;
 - d. the OC content of each organic material, in pounds per gallon;
 - e. for each day during which a photochemically reactive material is employed, the total organic compound emission rate for all organic materials, in pounds per day;
 - f. for each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation; and
 - g. for each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all organic materials, i.e., (e)/(f), in pounds per hour (average).

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1. The permittee shall submit quarterly deviation (excursion) reports which include the following information:
 - a. for the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions from the coatings and photochemically reactive cleanup materials exceeded 8 lbs/hr, and the actual average hourly organic compound emissions for each such day.
 - 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 lbs/day, and the actual organic compound emissions for each such day.

The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

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V. **Testing Requirements**

1. Emission Limitations:
8 lbs of OC/hr and 40 lbs of OC/day

Applicable Compliance Method:

Compliance with these emission limitations shall be determined based upon the records required pursuant to section A.III. If required, the permittee shall demonstrate compliance with the hourly OC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

2. The permittee shall use formulation data to determine the OC content of each organic material employed in this emissions unit.

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VI. **Miscellaneous Requirements**

1. None

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Facility ID: 1409010043 Emissions Unit ID: P006 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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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