

Facility ID: 1431490901 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:

P014 - Fiber/Waste Line  
P901 - Web coater No. 11  
P902 - Web coater No. 12

Each insignificant emissions unit at this facility shall 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.

- [Go to Part III for Emissions Unit B001](#)
- [Go to Part III for Emissions Unit B002](#)
- [Go to Part III for Emissions Unit B004](#)
- [Go to Part III for Emissions Unit P015](#)

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Part III - Terms and Conditions for Emissions Units

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Facility ID: 1431490901 Emissions Unit ID: B001 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>
42 MMBtu/hr Underfeed Stoker Coal-Fired Boiler (derated to 20 MMBtu/hr)	OAC rule 3745-17-07(A)	The visible emissions from any stack shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule. See A.I.2. 2.0 lbs SO2/MMBtu of actual heat input
	OAC rule 3745-17-10(C)	
	OAC rule 3745-18-37(JJ)	

2. Additional Terms and Conditions

- a. Pursuant to OAC rule 3745-17-10, the total heat input for B001 is derated from 42 MMBtu/hr to 20 MMBtu/hr. (The derated total heat input of 20 MMBtu/hr corresponds to a steam load of 13,500 pounds per hour.) Using the derated total heat input, the allowable particulate emissions rate for B001, from Figure I of OAC rule 3745-17-10, is 0.23 pound per MMBtu of actual heat input.

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II. Operational Restrictions

1. At no time shall the steam flow rate from B001 exceed 13,500 pounds per hour (as an average over any one-hour period).
2. The quality of the coal burned in this emissions unit shall have a combination of sulfur content and heat content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 2.0 pounds sulfur dioxide/MMBtu of actual heat input on an as received, wet basis.

Compliance with the above-mentioned specifications shall be determined by using a weighted, arithmetic average of the analytical results provided by the permittee or coal supplier for all shipments of coal during each calendar month.

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III. Monitoring and/or Record Keeping Requirements

1. Within 60 days of the effective date of this permit, the permittee shall install, operate and maintain a continuous opacity monitoring system to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13. The continuous emission monitoring system shall consist of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one-minute) basis, daily zero/span calibration checks, and manual calibration adjustments.

2. The permittee shall continuously monitor and record the steam flow rate from B001. Copies of all steam flow rate charts shall be maintained for a period of 5 years, and shall be made available to the Hamilton County

Department of Environmental Services upon verbal or written request.

3. The permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isothermal Bomb Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the Hamilton County Department of Environmental Services.

The permittee shall maintain monthly records of the total quantity of coal received, and the results of the analyses for ash content, sulfur content, and heat content.

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#### IV. Reporting Requirements

1. Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Hamilton County Department of Environmental Services documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitations.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Hamilton County Department of Environmental Services documenting any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

2. If for any reason the steam flow rate from B001 exceeds 13,500 pounds per hour, the following information shall be reported within 5 business days after the exceedance:
  - a. the date of the exceedance;
  - b. the time interval over which the exceedance occurred;
  - c. the value of the exceedance;
  - d. the cause(s) of the exceedance;
  - e. the corrective action which has been or will be taken to prevent similar exceedances in the future; and
  - f. a copy of the steam chart which shows the exceedance.
3. Quarterly reports shall be submitted concerning the quality and quantity of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
  - a. the total quantity of coal received (tons);
  - b. the average ash content (percent) of the coal received;
  - c. the average sulfur content (percent) of the coal received;
  - d. the average heat content (Btu/pound) of the coal received; and
  - e. the average sulfur dioxide emissions rate (pounds sulfur dioxide/MMBtu of actual heat input) from the coal received. This calculation shall be performed using equations and methods spelled out in OAC rule 3745-18-04.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the data obtained during the previous calendar quarters.

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#### V. Testing Requirements

1. Prior to the installation of the continuous opacity monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 1 for approval by the Ohio EPA, Central Office.

Within 60 days of the effective date of this permit, the permittee shall conduct certification tests on the continuous opacity monitoring system equipment pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 1. Personnel from the Hamilton County Department of

Environmental Services shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to the Hamilton County Department of Environmental Services pursuant to OAC rule 3745-15-04 within 30 days after the test is completed. Certification of the continuous opacity monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I), and 40 CFR Part 60, Appendix B, Performance Specification 1 including section 5.1.9 (mandatory).

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within six months of issuance of this permit, and on an annual basis thereafter.
  - b. The emission testing shall be conducted to demonstrate compliance with the particulate emission limitation of 0.23 lb/MMBtu of actual heat input.
  - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its derated maximum capacity, unless otherwise specified or approved by Hamilton County Department of Environmental Services.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services' refusal to accept the results of the emission test(s). Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

3. Compliance with the SO<sub>2</sub> emission limitation shall be determined by the recordkeeping requirements in A.III. and the reporting requirements in A.IV.
 

Should stack testing be required, Method 6 of 40 CFR Part 60, Appendix A shall be used.
4. Compliance with the visible emission limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(1).
5. Compliance with the particulate emission limitation shall be determined by the methods specified in OAC rule 3745-17-03(B)(9).

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#### VI. Miscellaneous Requirements

1. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

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Facility ID: 1431490901 Emissions Unit ID: B001 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>
42 MMBtu/hr Underfeed Stoker Coal-Fired Boiler (derated to 20 MMBtu/hr)		

**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: 1431490901 Emissions Unit ID: B002 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.

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>
42 MMBtu/hr Underfeed Stoker Coal-Fired Boiler (derated to 20 MMBtu/hr)	OAC rule 3745-17-07(A)  OAC rule 3745-17-10(C) OAC rule 3745-18-37(JJ)	The visible emissions from any stack shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule. See A.I.2. 2.0 lbs SO <sub>2</sub> /MMBtu of actual heat input
<b>2. Additional Terms and Conditions</b>		
a. Pursuant to OAC rule 3745-17-10, the total heat input for B002 is derated from 42 MMBtu/hr to 20 MMBtu/hr. (The derated total heat input of 20 MMBtu/hr corresponds to a steam load of 13,500 pounds per hour.) Using the derated total heat input, the allowable particulate emissions rate for B002, from Figure I of OAC rule 3745-17-10, is 0.23 pound per MMBtu of actual heat input.		

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#### II. Operational Restrictions

- At no time shall the steam flow rate from B002 exceed 13,500 pounds per hour (as an average over any one-hour period).
- The quality of the coal burned in this emissions unit shall have a combination of sulfur content and heat content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 2.0 pounds sulfur dioxide/MMBtu of actual heat input on an as received, wet basis.

Compliance with the above-mentioned specifications shall be determined by using a weighted, arithmetic average of the analytical results provided by the permittee or coal supplier for all shipments of coal during each calendar month.

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

- Within 60 days of the effective date of this permit, the permittee shall install, operate and maintain a continuous opacity monitoring system to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13. The continuous emission monitoring system shall consist of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one-minute) basis, daily zero/span calibration checks, and manual calibration adjustments.

- The permittee shall continuously monitor and record the steam flow rate from B002. Copies of all steam flow rate charts shall be maintained for a period of 5 years, and shall be made available to the Hamilton County Department of Environmental Services upon verbal or written request.
- The permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isothermal Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

The permittee shall maintain monthly records of the total quantity of coal received, and the results of the analyses for ash content, sulfur content, and heat content.

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#### IV. Reporting Requirements

- Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Hamilton County Department of Environmental Services documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitations.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Hamilton County Department of Environmental Services documenting any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

2. If for any reason the steam flow rate from B002 exceeds 13,500 pounds per hour, the following information shall be reported within 5 business days after the exceedance:
  - a. the date of the exceedance;
  - b. the time interval over which the exceedance occurred;
  - c. the value of the exceedance;
  - d. the cause(s) of the exceedance;
  - e. the corrective action which has been or will be taken to prevent similar exceedances in the future; and
  - f. a copy of the steam chart which shows the exceedance.
3. Quarterly reports shall be submitted concerning the quality and quantity of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
  - a. the total quantity of coal received (tons);
  - b. the average ash content (percent) of the coal received;
  - c. the average sulfur content (percent) of the coal received;
  - d. the average heat content (Btu/pound) of the coal received; and
  - e. the average sulfur dioxide emissions rate (pounds sulfur dioxide/MMBtu of actual heat input) from the coal received. This calculation shall be performed using equations and methods spelled out in OAC rule 3745-18-04.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the data obtained during the previous calendar quarters.

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#### V. Testing Requirements

1. Prior to the installation of the continuous opacity monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 1 for approval by the Ohio EPA, Central Office.

Within 60 days of the effective date of this permit, the permittee shall conduct certification tests on the continuous opacity monitoring system equipment pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 1. Personnel from the Hamilton County Department of Environmental Services shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to the Hamilton County Department of Environmental Services pursuant to OAC rule 3745-15-04 within 30 days after the test is completed. Certification of the continuous opacity monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I), and 40 CFR Part 60, Appendix B, Performance Specification 1 including section 5.1.9 (mandatory).

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted within six months of issuance of this permit, and on an annual basis thereafter.
  - b. The emission testing shall be conducted to demonstrate compliance with the particulate emission limitation of 0.23 lb/MMBtu of actual heat input.
  - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its derated maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services' refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

3. Compliance with the SO2 emission limitation shall be determined by the recordkeeping requirements in A.III. and the reporting requirements in A.IV.  
Should stack testing be required, Method 6 of 40 CFR Part 60, Appendix A shall be used.
4. Compliance with the visible emission limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(1).
5. Compliance with the particulate emission limitation shall be determined by the methods specified in OAC rule 3745-17-03(B)(9).

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VI. **Miscellaneous Requirements**

1. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

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**Facility ID: 1431490901 Emissions Unit ID: B002 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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42 MMBtu/hr Underfeed Stoker Coal-Fired Boiler (derated to 20 MMBtu/hr)		
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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

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Facility ID: 1431490901 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>
42 MMBtu/hr Underfeed Stoker Coal-Fired Boiler (derated to 20 MMBtu/hr)	OAC rule 3745-17-07(A)	The visible emissions from any stack shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule. See A.I.2. 2.0 lbs SO2/MMBtu of actual heat input
	OAC rule 3745-17-10(C)	
	OAC rule 3745-18-37(JJ)	

2. **Additional Terms and Conditions**

- a. Pursuant to OAC rule 3745-17-10, the total heat input for B004 is derated from 42 MMBtu/hr to 20 MMBtu/hr. (The derated total heat input of 20 MMBtu/hr corresponds to a steam load of 13,500 pounds per hour.) Using the derated total heat input, the allowable particulate emissions rate for B004, from Figure I of OAC rule 3745-17-10, is 0.23 pound per MMBtu of actual heat input.

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II. **Operational Restrictions**

- 1. At no time shall the steam flow rate from B004 exceed 13,500 pounds per hour (as an average over any one-hour period).
- 2. The quality of the coal burned in this emissions unit shall have a combination of sulfur content and heat content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 2.0 pounds sulfur dioxide/MMBtu of actual heat input on an as received, wet basis.

Compliance with the above-mentioned specifications shall be determined by using a weighted, arithmetic average of the analytical results provided by the permittee or coal supplier for all shipments of coal during

each calendar month.

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

1. Within 60 days of the effective date of this permit, the permittee shall install, operate and maintain a continuous opacity monitoring system to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13. The continuous emission monitoring system shall consist of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one-minute) basis, daily zero/span calibration checks, and manual calibration adjustments.

2. The permittee shall continuously monitor and record the steam flow rate from B004. Copies of all steam flow rate charts shall be maintained for a period of 5 years, and shall be made available to the Hamilton County Department of Environmental Services upon verbal or written request.
3. The permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isothermal Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

The permittee shall maintain monthly records of the total quantity of coal received, and the results of the analyses for ash content, sulfur content, and heat content.

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### IV. Reporting Requirements

1. Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Hamilton County Department of Environmental Services documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitations.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Hamilton County Department of Environmental Services documenting any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

2. If for any reason the steam flow rate from B004 exceeds 13,500 pounds per hour, the following information shall be reported within 5 business days after the exceedance:
  - a. the date of the exceedance;
  - b. the time interval over which the exceedance occurred;
  - c. the value of the exceedance;
  - d. the cause(s) of the exceedance;
  - e. the corrective action which has been or will be taken to prevent similar exceedances in the future; and
  - f. a copy of the steam chart which shows the exceedance.
3. Quarterly reports shall be submitted concerning the quality and quantity of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
  - a. the total quantity of coal received (tons);
  - b. the average ash content (percent) of the coal received;
  - c. the average sulfur content (percent) of the coal received;

- d. the average heat content (Btu/pound) of the coal received; and
- e. the average sulfur dioxide emissions rate (pounds sulfur dioxide/MMBtu of actual heat input) from the coal received. This calculation shall be performed using equations and methods spelled out in OAC rule 3745-18-04.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the data obtained during the previous calendar quarters.

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**V. Testing Requirements**

1. Prior to the installation of the continuous opacity monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 1 for approval by the Ohio EPA, Central Office.

Within 60 days of the effective date of this permit, the permittee shall conduct certification tests on the continuous opacity monitoring system equipment pursuant to ORC section 3704.03(l) and 40 CFR Part 60, Appendix B, Performance Specification 1. Personnel from the Hamilton County Department of Environmental Services shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to the Hamilton County Department of Environmental Services pursuant to OAC rule 3745-15-04 within 30 days after the test is completed. Certification of the continuous opacity monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(l), and 40 CFR Part 60, Appendix B, Performance Specification 1 including section 5.1.9 (mandatory).

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

- a. The emission testing shall be conducted within six months of issuance of this permit, and on an annual basis thereafter.
- b. The emission testing shall be conducted to demonstrate compliance with the particulate emission limitation of 0.23 lb/MMBtu of actual heat input.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: Method 5 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its derated maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services' refusal to accept the results of the emission test(s). Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

3. Compliance with the SO<sub>2</sub> emission limitation shall be determined by the recordkeeping requirements in A.III. and the reporting requirements in A.IV.

Should stack testing be required, Method 6 of 40 CFR Part 60, Appendix A shall be used.

4. Compliance with the visible emission limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(1).
5. Compliance with the particulate emission limitation shall be determined by the methods specified in OAC rule 3745-17-03(B)(9).

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**VI. Miscellaneous Requirements**

1. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance

Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

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Facility ID: 1431490901 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>
42 MMBtu/hr Underfeed Stoker Coal-Fired Boiler (derated to 20 MMBtu/hr)		

**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: 1431490901 Emissions Unit ID: P015 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>
Nonwoven Roll Goods Line with 13.5 MMBtu/hr Natural Gas-Fired Heater	40 CFR, Part 60, Subpart Dc	See A.III.1.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)	Particulate emissions from the combustion of natural gas in this emissions unit shall not exceed 0.020 lb per MMBtu of actual heat input.
	OAC rule 3745-21-07(G)	See A.II.2.

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The permittee shall burn only natural gas in this emissions unit.
2. The use of photochemically reactive materials as defined in Ohio Administrative Code rule 3745-21-01(C)(5) is prohibited.

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

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain documentation on whether or not each liquid organic material employed in this emissions unit is a photochemically reactive material as defined in Ohio Administrative Code (OAC) rule 3745-21-01(C)(5).

For each day during which the permittee employs a liquid photochemically reactive material, the permittee shall record the amount, in gallons, and organic compound (OC) content, in lbs of OC per gallon, of each material employed.

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**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day a photochemically reactive material was employed in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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**V. Testing Requirements**

1. Compliance with the visible emission limitation shall be determined by the method specified in OAC rule 3745-17-03(B)(1).
2. Compliance with the particulate emission limitation of 0.020 lb PE per MMBtu of actual heat input specified in OAC rule 3745-17-10(B)(1) may be determined by using the AP-42 (Table 1.4-2, Fifth Edition) emission factor for natural gas (1.9 lbs PE/million cubic feet).

Should stack testing be required, Method 5 of 40 CFR Part 60, Appendix A shall be used.

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VI. **Miscellaneous Requirements**

1. None

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**Facility ID: 1431490901 Emissions Unit ID: P015 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>
Nonwoven Roll Goods Line with 13.5 MMBtu/hr Natural Gas-Fired Heater	OAC rule 3745-31-05(A)(3) (PTI 14-4650)	See A.I.2.

2. **Additional Terms and Conditions**

- a. The following tons per year (TPY) emission limitations shall not be exceeded:

1.
  - Pollutant TPY
  - Ammonia\* 15.5
  - OC\*\* 5.77
  - PE/PM10\* 0.37
  - SO2\* 0.04
  - NOx\* 8.26
  - CO\* 2.07

\*The TPY emission limits for ammonia, SO2, NOx, PE, and CO are based on the maximum operating capacity of the line. Therefore, no daily record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits.

\*\*The TPY emission limitation for OC is based on a rolling, twelve-month summation.

- b. The following short term emission limitations\* shall not be exceeded:

Pollutant lbs/hr  
 Ammonia 3.5  
 OC 17.1

Pollutant lb/MMBtu  
 PE/PM10 0.0062  
 SO2 0.0006  
 NOx 0.14  
 CO 0.035  
 OC 0.0058

\*All of the lbs/hour and lb/MMBtu emission limitations are based on the maximum operating capacity of the line. Therefore, no hourly record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with these limits.

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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 month for this emissions unit:
  - a. the company identification for each organic material employed;
  - b. the number of pounds of each organic material employed;
  - c. the percent by weight of OC for each organic material, as applied;
  - d. the total monthly organic compound emission rate for all materials employed (the summation of line b X line c for each material employed); and
  - e. the updated rolling, 12-month summation for organic compound emissions (the OC emissions for the current calendar month in tons, added to the OC emissions for the previous eleven calendar months, in tons).
2. The permit to install for this emissions unit (P015) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Formaldehyde

TLV (mg/m3): 0.370

Maximum Hourly Emission Rate (lbs/hr): 0.68

Predicted 1-Hour Maximum Ground-Level

Concentration at the Fence Line (ug/m3): 4.8

MAGLC (ug/m3): 8.8

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).  
If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

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**IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which list any exceedance of the rolling, twelve-month organic compound emission limitation listed in B.1.2.

2. The permittee shall submit an annual report which specifies the total OC emissions from this emissions unit. This report shall be submitted by January 31 of each year and cover the previous calendar years operation.

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V. **Testing Requirements**

1. Compliance with the rolling, twelve-month summation for OC emissions listed in B.I.2. shall be determined by the record keeping required in B.III.1.
2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of the organic materials employed.

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VI. **Miscellaneous Requirements**

1. None