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Facility Name: **Bay West Towel & Tissue Mill**

Application Number: **14-4560**

Date: **July 15, 1998**

GENERAL PERMIT CONDITIONS

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code

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(OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

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| <u>Ohio EPA Source Number</u> | <u>Source Identification Number</u> | <u>BAT Determination</u> | <u>Applicable Federal & OAC Rules</u> | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> |
|-------------------------------|-------------------------------------|--------------------------|---|--|
|-------------------------------|-------------------------------------|--------------------------|---|--|

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Bay West Towel & Tissue Mill** located in **Butler** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

| <u>Ohio EPA Source Number</u> | <u>Source Identification</u> | <u>BAT Determination</u> |
|--------------------------------|--|---|
| P103 Mod- ifica- tion | Bay West Paper Machine No. 1 with 27 MMBTU/ hour dryer | Bay West Natural De-inking process Bay West Bleach De-inking process |
| P104 Mod- ifica- tion | | BAT is satisfied by use of non-photo- chemically reactive materials |
| P102 Modi- fica-ti on | Bay West Paper Machine No. 2 with 27 MMBTU/ hour dryer | BAT is satisfied by use of non-photo- chemically reactive materials |

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| <u>Ohio EPA Source Number</u> | <u>Source Identification Number</u> | <u>BAT Determination</u> | <u>Applicable Federal & OAC Rules</u> | <u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u> |
|---|--|--|---|---|
| | | | 3745-21-07 (G) | |
| | * The emission limitation established by this rule is less stringent than those established by | Applicable Federal & <u>OAC Rules</u> | 3745-15-07 3745-31-05 | Permit Allowable Mass Emissions and/or <u>Control/Usage Requirements</u> |
| BAT is satisfied by use of non-photochemically reactive materials | Ohio Administrative Code (OAC) 3745-31-05 (BAT) . | 3745-15-07 3745-31-05 3745-17-07 3745-17-10* 3745-21-07 (G) * | 3745-21-07 (G) | See Term and Condition F.2. See Term and Conditions A.1. and B.1. See Term and Condition A.2. Less stringent Less stringent |
| BAT is satisfied by use of non-photochemically reactive materials | | 3745-15-07 3745-31-05 3745-17-07 3745-17-10* 3745-21-07 (G) * | | See Term and Condition F.2. See Term and Conditions A.1. and B.1. See Term and Condition A.2. Less stringent Less stringent |
| | | 3745-15-07 3745-31-05 | | See Term and Condition F.2. See Term and Conditions A.3. |

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|---|----------------------|-----------------------|
| SUMMARY | | |
| TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS | | |
| <u>Pollutant</u> | Organic Compounds | NO _x CO |
| | PM | PM ₁₀ |
| | SO ₂ | |

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| <u>Allowable Tons Per Year</u> | Baseline Existing Emission Tons <u>Per Year</u> | <u>Net Increase Tons Per Year</u> |
|------------------------------------|--|---------------------------------------|
| 111.5 | 77.45 | 34.05 |
| 1.5 | | |
| 0.14 | | |
| 39.9 | | |
| 8.3 | | |
| 1.5 | | |

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Hamilton County Dept. of Env. Services, 1632 Central Parkway, Cincinnati, OH 45210.**

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

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In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Hamilton County Dept. of Env. Services, 1632 Central Parkway, Cincinnati, OH 45210.**

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

A. Applicable Emission Limitations and/or Control Requirements

1. The total combined emissions from emissions units P101 and P102 shall not exceed the following:
 - a. 1925 pounds organic compounds (OC) per week and 26 tons OC per year as a rolling, 12-month summation from off-line wire and felt cleaning operations;
 - b. 378.1 pounds OC per day and 69 tons OC per year from all operations associated with emissions units P101 and P102 except off-line wire and felt cleaning operations and OC emissions from the natural gas/LPG dryers;
 - c. 7.5 pounds OC per day and 1.4 tons OC per year from combustion emissions from natural gas/LPG fired dryers;
 - d. 8.5 pounds PM-PM₁₀ per day and 1.5 tons PM-PM₁₀ per year from combustion emissions from natural gas/LPG

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fired dryers;

- e. 269.1 pounds nitrogen oxides (NO_x) per day and 39.9 tons NO_x per year based upon a rolling, 12-month summation from combustion emissions from natural gas/LPG fired dryers;
 - f. 0.78 pound sulfur dioxide (SO₂) per day and 0.14 ton SO₂ per year from combustion emissions from natural gas/LPG fired dryers; and,
 - g. 45.4 pounds carbon monoxide (CO) per day and 8.3 tons CO per year from combustion emissions from natural gas/LPG fired dryers.
2. Visible particulate emissions from any stack associated with emissions unit P101 and P102 shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
 3. The OC emissions from emissions units P103 and P104 combined shall not exceed 82.6 pounds per day and 15.1 tons per year.
 4. The following is a summary of the OC emissions from emissions units P101, P102, P103 and P104

| Emissions unit | Pollutant | Baseline existing* emissions TPY | Allowable emissions TPY | Net Increase TPY |
|----------------|-----------|----------------------------------|-------------------------|------------------|
| | | | | |

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| | | | | |
|--|----|-------|-------|---------|
| P101 Paper machine operations | OC | 27.3 | 49.5 | + 22.2 |
| P102 Paper machine operations** | OC | 19.5 | 19.5 | 0 |
| P101 & P102 off-line wire & felt cleaning operations | OC | 19.15 | 26 | + 6.85 |
| P101 & P102 dryer emissions** | OC | 1.4 | 1.4 | 0 |
| P103 & P104 | OC | 10.1 | 15.1 | + 5.0 |
| Net emissions change | OC | 77.45 | 111.5 | + 34.05 |

* Actual average emissions for 1996 and 1997

** As these operations are not being modified in this PTI, the baseline existing is the same as the existing allowable emissions.

B. Operational Restrictions

1. The use of photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5) is prohibited in emissions units P101, P102, P103 and P104.

C. Monitoring and Recordkeeping Requirements

1. The permittee shall collect and record the following information each week for emissions units P101 and P102 combined:
 - a. the name and identification of each liquid organic material employed for off-line wire and felt cleaning;
 - b. the amount of each liquid organic material employed for off-line wire and felt cleaning;
 - c. the OC content of each liquid organic material employed for off-line wire and felt cleaning; and,
 - d. the total weekly OC emissions from off-line wire and felt cleaning operations in pounds per week

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calculated by taking the sum of (b) times (c) for each liquid organic material employed for off-line wire and felt cleaning.

2. The permittee shall collect and record the following information each month for OC emissions associated with emissions units P101 and P102 except off-line wire and felt cleaning operations and natural gas/LPG dryers:

- a. the amount of air dried tons of product (ADTP) produced in emissions unit P101;
- b. the amount of air dried tons of product (ADTP) produced in emissions unit P102;
- c. the total monthly OC emissions calculated by using the following equation:

Monthly OC emissions (in pounds)
= [ADTP/mo. in P101 * 0.1142 lb OC emissions/
ADTP]
+ [ADTP/mo. in P102 * 0.1082 lb OC emissions/
ADTP]
+ [Total ADTP/mo. in P101 and P102 * 0.821 lb OC
emissions/ADTP]; and,

3. The permittee shall collect and record the following information each month for emissions unit P101 and P102:

- a. the updated rolling, 12-month summation of OC emissions from emissions units P101 and P102 from off-line wire and felt cleaning operations, calculated by adding the current month's total OC emissions to the total OC emissions for the preceding eleven calendar months.

4. The permittee shall collect and record the following information each month for emissions units P101 and P102:

- a. the combined amount of LPG used in the dryers associated with emissions units P101 and P102, in gallons per month;

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- b. the combined amount of natural gas used in the dryers associated with emissions units P101 and P102, in cubic feet per month;
- c. the monthly combined NO_x emissions from the dryers associated with emissions units P101 and P102 using the following equation:

$$\begin{aligned} &\text{Monthly NO}_x \text{ emissions (in pounds)} \\ &= [\text{gallons/month LPG used (a)} * 0.019 \text{ lb} \\ &\text{NO}_x \text{/gallon}] \\ &+ [\text{cubic feet/month natural gas used (b)} * 0.00014 \\ &\text{lb NO}_x \text{/cubic feet}]; \text{ and,} \end{aligned}$$

- d. the updated rolling, 12-month summation of NO_x emissions from the dryers associated with emissions units P101 and P102, calculated by adding the current month's total NO_x emissions to the total NO_x emissions for the preceding eleven calendar months.
5. The permittee shall collect and record the following information each month for emissions unit P103 and P104:
- a. the amount of air dried tons of products (ADTP) produced; and,
 - b. the total monthly OC emissions calculated by using the following equation:

$$\begin{aligned} &\text{Monthly OC emissions} \\ &= [\text{ADTP/mo.} * 0.2232 \text{ lb OC emissions/ADTP}] \end{aligned}$$

6. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created, unless otherwise specified in this permit. Support information shall include, but not be limited to, all calibration and maintenance

records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of

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all reports required by this permit. Such records may be maintained in computerized form.

7. For purpose of this Permit to Install, the term "day" shall mean the 24-hour period beginning at 7:00 A.M.

D. Reporting Requirements

1. The permittee shall submit required reports in the following manner:
 - a. reports of any required monitoring and/or recordkeeping information shall be submitted to the Hamilton County Dept. of Env. Services; and,
 - b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Hamilton County Dept. of Env. Services. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly i.e., by January 30, April 30, July 30, and October 30 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).
2. The permittee shall submit annual reports which specify the total combined organic compounds emissions from emissions units P101, P102, P103 and P104 for the previous calendar year. These reports shall be submitted by January 31 of each year.
3. The permittee shall submit annual reports which specify

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the total combined nitrogen oxides emissions from emissions units P101 and P102 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Compliance Methods/Testing Requirements

1. Compliance with the emissions limits in Terms A.1.a, A.1.b and A.3 shall be demonstrated by the recordkeeping in Terms C.1, C.2 and C.4.
2. Compliance with the emissions limits in Terms A.1.c, A.1.d, A.1.f and A.1.g shall be demonstrated by multiplying the usage from Term C.3 with emissions factor for natural gas / LPG combustion from Compilation of Air Pollution Emissions Factors (AP-42), Chapters 1.4 and 1.5, Fourth Edition.
3. Compliance with the emissions limits in Term A.1.e shall be demonstrated by the recordkeeping in Term C.3.
4. Compliance with the visible emissions limitation in Term A.2 shall be demonstrated by Method 9, 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

1. If probable cause exist indicating the source is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3475-15-07, the owner or operator of these emissions unit shall be required to submit and implement a control program which will bring them into compliance.
2. The following terms and conditions shall supersede all the Air Pollution Control requirements for emissions units P101, P102, P103 and P104 contained in the permit

to install application number 14-4391 as issued on March 25, 1998:

A-F

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3. The daily emissions limitations in Terms A.1.b - A.1.g and Term A.3 are based upon the maximum hourly/application rate at 24 hours per day and therefore, no daily records are required.