

Bay West Paper Corporation
PTI 14-4628

Additional Terms and Conditions

A. Applicable Emission Limitations and/or Control Requirements

1. There shall be no visible particulate emissions from any paved roadway or parking area except for a period of time not to exceed one minute during any sixty-minute observation period.
2. There shall be no visible particulate emissions from any unpaved roadway or parking area except for a period of time not to exceed three minutes during any sixty-minute observation period.
3. All paved roadways and parking areas shall be flushed with water to minimize or eliminate, at all times, visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitation.
4. The permittee shall promptly remove, in such a manner as to minimize or prevent re-suspension, 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.
5. The unpaved shoulders of all paved roadways shall be treated with water and/or any other suitable dust suppression chemicals to minimize or eliminate, at all times, visible emissions of fugitive dust generated by vehicular traffic and to ensure compliance with the above-mentioned visible emission limitation.
6. 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 with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance with the visible emission limitation. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

7. 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 an unpaved or paved 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.
8. 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 using appropriate dust control measures 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 specified in OAC rule 3745-17-07(B) (4).
9. Open-bodied vehicles transporting materials likely to become airborne shall have such materials covered at all times if the control measure is necessary to minimize or eliminate visible emissions of fugitive dust.
10. 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.

B. Operational Restrictions

None

C. Monitoring and Recordkeeping 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:

<u>Unpaved and Paved Roadways</u>	<u>Minimum Inspection Frequency</u>
all	daily
<u>Unpaved and Paved Parking Areas</u>	<u>Minimum Inspection Frequency</u>
all	daily

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 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 (d) shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

3. 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. Support information shall include, but not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. Such records may be maintained in computerized form.

D. Reporting Requirements

1. The permittee shall submit 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 permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- 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 appropriate Ohio EPA District Office or local air agency. 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).

E. Compliance Methods/Testing Requirements

1. Compliance with the emission limitation 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.

PERMIT REVIEW NARRATIVE
PTI 14-4628

Bay West Paper Corporation
700 Columbia Avenue
Middletown, OH 45042

Premise Number: 1409010043

Mosinee Paper Corporation currently owns and operates three subsidiaries located on common property in Middletown, OH - Bay West Towel and Tissue Mill (Bay West), The Sorg Paper Company (Sorg) and Mosinee Holdings Inc (MHI). Ohio EPA has recently ruled that the three facilities should be considered a single facility for New Source Review and Title V purposes.

Bay West began operation during 1991 on property previously owned by Sorg. Bay West was issued a PTI by Ohio EPA (PTI # 14-4391) for all facility operations except for roadways and parking areas. The roadways and parking areas on Bay West property were included in the Permit to Operate Registration Status for Sorg. The purpose of this PTI is to separate the roadways and parking areas located on Bay West property.

The applicable regulations are OAC rules 3745-31-05, OAC 3745-15-07, OAC 3745-17-07(B) and OAC 3745-17-08(B).

The emissions are expected to be fugitive dust. The actual particulate matter (PM) emissions are expected to be 5.26 tons per year and the potential allowable PM emissions is 8.31 tons per year.

BAT is satisfied by visible emissions limitations and the use of Reasonably Available Control Measures (RACM) to minimize or eliminate visible emissions of fugitive dust.

A final PTI should be issued as the emissions unit will be in compliance with the applicable regulations.

The permit fee is: \$200.00 (based on minimum PWR)

Prepared by: Ajay Bahri
Date prepared: August 11, 1998