

1

Facility Name: **Scio Packaging Co., Inc.**

Application Number: **17-1619**

Date: **August 12, 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 SOURCES

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 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 (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

2

Facility Name: **Scio Packaging Co., Inc.**

Application Number: **17-1619**

Date: **August 12, 1998**

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 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 30 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.

3

Facility Name: **Scio Packaging Co., Inc.**

Application Number: **17-1619**

Date: **August 12, 1998**

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.

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 filed no later than thirty days after commencement of operation.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a 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 and regulations.

4

Facility Name: **Scio Packaging Co., Inc.**

Application Number: **17-1619**

Date: **August 12, 1998**

5

Facility Name: **Scio Packaging Co., Inc.**

Application Number: **17-1619**

Date: **August 12, 1998**

<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>
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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Scio Packaging Co., Inc.** located in **Harrison** 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 Description</u>
P905	150 tons/hr pneumatic biquet binder blending system with 4 storage silos, pneumatic truck & rail unloading & loadout stations and a hand station
P905 (Cont)	

P905 (Cont)

Facility Name: **Scio Packaging Co., Inc.**
Application Number: **17-1619**
Date: **August 12, 1998**

<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>
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Facility Name: **Scio Packaging Co., Inc.**

Application Number: **17-1619**

Date: **August 12, 1998**

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BAT
Determination

Fabric bin
vent filter,
extendable
loading spouts
with fabric
filter,
enclosed mixer
fabric filter
ventilated
hand add
station with
fabric filter,
enclosed pipes
& compliance
with terms &
conditions of
this permit.

Facility Name: **Scio Packaging Co., Inc.**

Application Number: **17-1619**

Date: **August 12, 1998**

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Facility Name: **Scio Packaging Co., Inc.**

Application Number: **17-1619**

Date: **August 12, 1998**

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				3745-15-07
		3745-31-05	3745-17-07 (B)	
	Applicable Federal & OAC Rules	3745-17-07 (A)	3745-15-06	
3745-31-05 3745-17-08 (B) (3)			3745-15-07	
		3745-17-11		
		3745-17-08 (B)	3745-31-05	
3745-17-07 (A)	3745-17-07 (A)			
3745-17-07 (B)	3745-31-05		3745-17-08 (B)	
3745-17-11			3745-17-07 (B)	
3745-15-06				
		3745-17-08 (B)	3745-15-06	
3745-15-07				

Facility Name: **Scio Packaging Co., Inc.**

Application Number: **17-1619**

Date: **August 12, 1998**

<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>
Permit Allowable Mass Emissions and/or Control/Usage Requirements	nal Special Terms and Conditions	Special Terms & Conditions	Special Terms and Conditions	
	Less restrictive than BAT	Less Restrictive Than BAT	<u>Rail Loadout Station</u> PM - 0.030 gr/DSCF or no visible particulate emission whichever is less restrictive and 1.66 T/YR.	
	Less restrictive than BAT	See Additional Special Terms and Conditions For minimizing or eliminating fugitive dust at hand add station		
<u>Silo Vents</u>	Less restrictive than BAT	Less restrictive than BAT		
<u>C-1,</u>	See		See Additional Special Terms and Conditions	
<u>C-2,</u>	Additional	<u>Truck Loadout</u>		
<u>C-3,</u>	Special Terms	PM = 0.030 gr/DSCF		
<u>C-4</u>	and	or no visible particulate emission whichever is less restrictive and 0.675 T/yr.	Less restrictive than Bat	
PM=0.030 gr/DSCF or no visible emission whichever is less restrictive and 0.675 T/yr	Conditions		See Additional Special Terms and Conditions	
	See Additional Special Terms and Conditions	See Additional Special Terms and Conditions		
	Additional Special Terms and Conditions	See Additional Special Terms and Conditions	See Additional Special Terms and Conditions	
	See Additional Special Terms and Conditions	See Additional Special Terms and Conditions	See Additional Special Terms and Conditions	
	Additional Special Terms and Conditions	See Additional Special Terms and Conditions	See Additional Special Terms and Conditions	
	Less Restrictive Than BAT, See Additional	See Additional Special Terms and Conditions	See Additional Special Terms and Conditions	
	Additional	See Additional		

Facility Name: **Scio Packaging Co., Inc.**

Application Number: **17-1619**

Date: **August 12, 1998**

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PM	5.295

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

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 **Southeast District Office, DAPC, 2195 Front Street, Logan, Ohio 43138.**

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

Facility Name: **Scio Packaging Co., Inc.**

Application Number: **17-1619**

Date: **August 12, 1998**

sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

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 (Also See Air Emission Summary)

1. The particulate emission from the silo bin vent fabric filters C-1 through C-4 shall not exceed 0.030 grain per dry standard cubic foot or there shall be no visible emission whichever is less restrictive. Annual particulate emission shall not exceed 0.675 ton per year;
2. The particulate emission from the blender fabric filter M3 shall not exceed 0.06 pound per hour. Visible particulate emission from the blender fabric filter shall not exceed 10 percent opacity as a six-minute average. Annual particulate emission from the blender fabric filter shall not exceed 0.26 t/yr.
3. The particulate emission from the truck loading fabric filter L-3 shall not exceed 0.030 grain per dry standard cubic foot or there shall be no visible particulate emission whichever is less restrictive. Annual particulate emission shall not exceed 0.675 t/yr.
4. The particulate emission from the rail loading fabric filter L-4 shall not exceed 0.030 grain per dry standard cubic foot or there shall be no visible particulate emission whichever is less restrictive. Annual particulate emission shall not exceed 1.66 t/yr.

Facility Name: **Scio Packaging Co., Inc.**

Application Number: **17-1619**

Date: **August 12, 1998**

5. The permittee shall maintain and employ the silo enclosure, weigh batcher enclosure and mixer enclosure, pneumatic conveying pipe air slides and the hand add station such that there are no visible particulate emission.
6. Annual and hourly particulate emission were estimated based on maximum hourly through put and 8760 hours of operation per year. Therefore no record keeping is required.
7. Additional Terms and Conditions
 - a. the permittee shall maintain and employ the pneumatic unloading system for the unloading of bulk material into storage silos such that all dust shall be vented through a fabric filter in order to minimize or eliminate visible emission of fugitive dust;
 - b. the permittee shall maintain and employ all pipes and fittings in a leak tight manner in order to minimize or eliminate visible emissions of fugitive dust;
 - c. the permittee shall ensure that the silos are adequately enclosed and vented to a fabric filter, the enclosure shall be sufficient to eliminate visible emissions of fugitive dust at the point of capture; and,
 - d. the permittee shall operate and maintain the extendable loading spout such that the spout will be positioned in such a manner to properly seal in a leak free condition at the tanker truck and rail tanker car openings in order to minimize or eliminate fugitive dust during loading activities.

B. OPERATIONAL RESTRICTIONS

1. The fabric filters serving emission activities P901 shall be regularly cleaned by setting the automatic timers to the frequency and duration recommended by the

Facility Name: **Scio Packaging Co., Inc.**

Application Number: **17-1619**

Date: **August 12, 1998**

manufacturer (or other values established during an approved compliance demonstration) at all times while the emissions unit is in operation.

C. MONITORING AND/OR RECORD KEEPING REQUIREMENTS

1. The permittee shall perform daily checks for any visible particulate emissions from the fabric filters exhaust, transfer point, air slides, pneumatic conveying pipes and enclosures while the emission unit is in operation. The presence of or absence of any visible particulate emission from the fabric filters exhaust, transfer point, air slides, pneumatic conveying pipes and enclosures shall be noted in an operations log. If any visible particulate emissions are observed, corrective action shall be taken to eliminate the visible particulate emissions and these actions shall also be noted in the operations log.

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;
 - b. each instance when a control measure, that was to be operating properly was not; and,
 - c. the permittee shall submit deviation (excursion) reports that identify all periods of time during which the cleaning cycle timer for the fabric filters did not comply with allowable frequency and duration specified above.
2. The deviation reports shall be submitted within 30 days of the end of the calendar quarter to the appropriate Ohio EPA District office or Local Air Agency.
3. The permittee shall submit an annual deviation (excursion) report which identify exceedances of 12-month production rate limitation by February 15.
4. The permittee shall submit required reports in the following manner:

Facility Name: **Scio Packaging Co., Inc.**

Application Number: **17-1619**

Date: **August 12, 1998**

- a. reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency; and,
- b. except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (1) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (2) the probable cause of such deviations, and (3) 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. TESTING REQUIREMENTS AND COMPLIANCE METHOD DETERMINATION

1. Compliance with the emission limitations in the Air Emission Summary and in the Terms and Conditions for emission unit P905 shall be determined in accordance with the following methods:
 - a. Emission Limitation - 10 percent opacity as a six-minute average from the blender fabric filter

Applicable Compliance Method: Visible particulate emission shall be determined in accordance with the procedures and methods provided in OAC rule 3745-17-03(B)(1) and 40 CFR Part 60 Appendix A Method 9.
 - b. Emission Limitation- PM: No visible particulate emission at any time from the silos fabric filter, truck and rail car loading fabric filter and weigh batcher and mixer enclosure, pneumatic conveying pipe and air slides and

Facility Name: **Scio Packaging Co., Inc.**

Application Number: **17-1619**

Date: **August 12, 1998**

hand add station.

Applicable Compliance Method: Compliance with the no visible emission limitations 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.

- c. Emission Limitation - PM: 0.030 grain PM/dry standard cubic foot from the silo and truck and rail loadout stations' fabric filters

Applicable Compliance Method: If required, USEPA, 40 CFR Part 60, Appendix A, Method 5. Otherwise multiply the NEDS Source Classification Codes and Emission Factor Listing dated December 1984 page 63 emission factors of 0.24 lb of PM per ton of material stored, 0.04 lb PM per ton loaded into trucks or rail car by the maximum report capacities as follows 50 tons material to silo, 150 ton per hour loaded into the trucks and rail cars. The PM is multiplied by the fabric filter control efficiency of (1-.99) and divided by the air flow of 600 ACFM for the silo fabric filters and truck

load out fabric filter and 1500 ACFM for the rail car load out fabric filter and 60 minutes per hour and 7000 grains per pound and compared to the allowable.

- d. Emission Limitation - PM: 0.675 ton PM/yr from each silo fabric filters and truck loading fabric filter

Applicable Compliance Method: Multiply the 0.030 grain per dry standard cubic foot by the 600 standard cubic feet per minute by 60 minutes per hour times 8760 hours per year and divide by 7000 grains per pound and divide by 2000 pounds per ton.

Facility Name: **Scio Packaging Co., Inc.**

Application Number: **17-1619**

Date: **August 12, 1998**

- e. Emission limitation- .06 lb PM/hr mixer fabric filter

Applicable Compliance Method: If required, USEPA, 40 CFR Part 60, Appendix A, Method 5. Otherwise multiply the NEDS Source Classification Codes and Emission Factor Listing dated December 1984 page 63, emission factor of 0.04 lb PM/ton by 150 t/hr maximum mixing rate and multiply this result by a control efficiency of (1-.99).

- f. Emission limitation- 0.26 t/yr PM from mixer fabric filter

Applicable Compliance Method: Multiply the hourly emission rate from above by 8760 hours per year and divide by 2000 pounds per tons.

- g. Emission Limitation - PM: 1.66 ton PM/yr from rail tanker car loading fabric filter

Applicable Compliance Method: Multiply the 0.030 grain per dry standard cubic foot by the 1500 standard cubic feet per minute by 60 minutes per hour times 8760 hours per year and divide by 7000 grains per pound and divide by 2000 pounds per ton.

F. MISCELLANEOUS REQUIREMENTS

none