



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
FAIRFIELD COUNTY**

CERTIFIED MAIL

Street Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:
Lazarus Gov.
Center

Application No: 01-08204

DATE: 7/13/00

Sonoco
Peggi Davis
Post Office Box 160
Heartsville, SC 29551

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

CDO



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

FINAL PERMIT TO INSTALL 01-08204

Application Number: 01-08204
APS Premise Number: 0123010150
Permit Fee: **\$400**
Name of Facility: Sonoco
Person to Contact: Peggi Davis
Address: Post Office Box 160
Heartsville, SC 29551

Location of proposed air contaminant source(s) [emissions unit(s)]:

831 South Memorial Dr
Lancaster, Ohio

Description of proposed emissions unit(s):

Cleaver Brooks Boiler #2.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Director

Part I - GENERAL TERMS AND CONDITIONS**A. State and Federally Enforceable Permit To Install General Terms and Conditions****1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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 be 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.11 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition

declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

B. State Only Enforceable Permit To Install General Terms and Conditions**1. Compliance Requirements**

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 state-only required 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 31, April 30, July 31, and October 31 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.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

6. Construction of New Sources(s)

The proposed emissions unit(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 emissions unit(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 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.

7. 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.

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

9. 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.

10. 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.

11. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	1.97
SO ₂	69.5
Nox	19.6
CO	11.77
VOC	0.77

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 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>
B002 - (Boiler # 2)- Natural gas and fuel oil fired 33.5 MMBTU/hr boiler with low Nox burners	OAC rule 3745-31-05(A)(3)	Particulate emissions shall not exceed 0.45 lb/hr. Sulfur dioxide emissions shall not exceed 15.87 lbs/hr. Nitrogen oxides emissions shall not exceed 4.47 lbs/hr. Carbon monoxide emissions shall not exceed 2.69 lbs/hr. Volatile organic compound emissions shall not exceed 0.2 lb/hr.
		See A.II.1 and 2 below.
	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input.
	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-18-06(D)	Sulfur dioxide emissions shall not exceed 1.6 lbs/mmBtu of actual heat input.
	40 CFR 60 Subpart Dc	See A.III.1 below.

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Sonoco

PTI A1

Issued: 7/13/00

Emissions Unit ID:B002

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

1. The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in Section A.I above.
2. Only natural gas or number two fuel oil with a sulfur content of no more than 0.5%, by weight, shall be burned in this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

1. Pursuant to 40 CFR Part 60, Subpart Dc, the permittee shall record and maintain records of the amount of natural gas combusted during each day.
2. 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.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) Also, if necessary, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of oil during a calendar month.

The permittee shall provide or require the supplier to provide documentation that the number two fuel oil, received for burning in this emissions unit, has been analyzed for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D396, for sulfur content; and ASTM method D4809 for heat content. Alternative, equivalent methods may be used upon written approval by the Ohio EPA, Central District Office.

IV. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Central District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon a volume-weighted average of the calculated sulfur dioxide emission rates from Section A.III above. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Central District Office) within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than number two fuel oil or natural gas was burned in this emissions unit. Each report shall be submitted

within 30 days after the deviation occurs.

3. The permittee shall notify the Director (Ohio EPA, Central District Office) in writing of any record required by Section A.III. which shows a deviation of the sulfur content limitation from Section A.II.2 above. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Central District Office) within 45 days after the deviation occurs.

4. The permittee shall submit deviation (excursion) reports that identify each day during which records are not maintained on the amount of natural gas combusted in this emissions unit. The notification shall be sent to the Ohio EPA, Central District Office as required in the General Terms and Conditions of this permit.

V. Testing Requirements

Compliance with the emission limitations in Section A.I of these terms and conditions shall be determined in accordance with the following methods:

1. Emission Limitation: Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

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

2. Emission Limitation: Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input, 0.45 lb/hr, and Nitrogen oxides emissions shall not exceed 4.47 lbs/hr.

Applicable Compliance Method: In order to demonstrate compliance for those instances where this emissions unit burns fuel oil, the permittee shall conduct, or have conducted, emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate(s) for Nox and PM in accordance with the following requirements:

- a. The emission testing shall be conducted within 90 days of start up of the emissions unit.
- b. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for Nox and PM: 40 CFR Part 60, Appendix A, Methods 1-4, 5(PM) and 7E (Nox).
- c. The test(s) shall be conducted while the emissions unit is operating at the maximum process weight rate and burning # 2 fuel oil.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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 Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

For those cases where this emissions unit burns natural gas, compliance with the allowable mass emission rate for particulate matter shall be determined by multiplying an emission factor of 7.6 lb of particulate matter per 1,000,000 standard cubic feet of natural gas combusted by the emissions unit's maximum hourly consumption rate (32,000 cubic feet/hr). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2(7/98).

Also, for those cases where this emissions unit burns natural gas, compliance with the allowable mass emission rate for NO_x shall be determined by multiplying an emission factor of 32 pounds of NO_x per 1,000,000 standard cubic feet of natural gas combusted by the emissions unit's maximum hourly consumption rate (32,000 cubic feet/hr). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1(7/98).

3. Emission Limitation: 2.69 lbs of carbon monoxide/hr

Applicable Compliance Method: In order to demonstrate compliance for those instances where this emissions unit burns natural gas, the permittee shall conduct, or have conducted, emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate(s) for CO in accordance with the following requirements:

- a. The emission testing shall be conducted within 90 days of start up of the emissions unit.
- b. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s) for CO: 40 CFR Part 60, Appendix A, Methods 1-4 and

10(CO).

- c. The test(s) shall be conducted while the emissions unit is operating at the maximum process weight rate and burning natural gas.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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 Ohio EPA, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

When burning fuel oil compliance with the allowable mass emission rate for carbon monoxide shall be determined by multiplying an emission factor of 5.0 lbs of carbon monoxide per 1000 gallons of oil combusted by the emissions unit's maximum hourly consumption rate (223.5 gal/hr). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-2(7/98).

4. Emission Limitation: 15.87 lbs of sulfur dioxide/hr

Applicable Compliance Method:

For those instances where this emissions unit burns fuel oil, compliance with the allowable mass emission rate for sulfur dioxide shall be determined by multiplying an emission factor of 71.0 lbs* of sulfur dioxide per 1000 gallons of oil combusted by the emissions unit's maximum hourly consumption rate (223.5 gal/hr). (* 71.0 is a result of $142 \times S$ where S = the % weight of sulfur in oil (0.5%)) This emission factor calculation is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-2. For those cases where this emissions unit burns natural gas, compliance with the allowable mass emission rate for sulfur dioxide shall be determined by multiplying an emission factor of 0.6 lb of sulfur dioxide per 1,000,000 standard cubic feet of natural gas combusted by the emissions unit's maximum hourly consumption rate (32,000 cubic feet/hr). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2(7/98). If required, the permittee shall demonstrate compliance with this

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emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 6.

5. Emission Limitation: 1.6 lbs of sulfur dioxide/mmBtu of actual heat input

Applicable Compliance Method:

Except as provided below, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

If the sulfur content of each shipment of oil received during a calendar month does not comply with the allowable emission limitation on an "as-received" basis, compliance with the allowable sulfur dioxide emission limitation shall be based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments of oil during the calendar month.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 6.

6. Emission Limitation: 0.2 lb of volatile organic compounds/hr

Applicable Compliance Method:

For those cases where this emissions unit burns natural gas, compliance with the allowable mass emission rate for volatile organic compounds shall be determined by multiplying an emission factor of 5.5 lb of volatile organic compounds per 1,000,000 standard cubic feet of natural gas combusted by the emissions unit's maximum hourly consumption rate (32,000 cubic feet/hr). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2(7/98). For those instances where this emissions unit burns fuel oil, compliance with the allowable mass emission rate for volatile organic compounds shall be determined by multiplying an emission factor of 0.556 lbs* of sulfur dioxide per 1000 gallons of oil combusted by the emissions unit's maximum hourly consumption rate (223.5 gal/hr). This emission factor calculation is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-2(7/98). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 25.

VI. Miscellaneous Requirements

This Air Permit To Install replaces PTI # 01- 6003 for emissions unit B002, as issued on November 15, 1995.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
B002 - Boiler # 2	OAC rule 3745-31-05	none

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Ohio EPA Permit to Install Information Form Please describe below any documentation which is being submitted with this recommendation (must be sent the same day). Electronic items should be submitted with the e-mail transmitting the PTI terms, and in software that CO can utilize. If mailing any hard copy, this section must be printed as a cover page. All items must be clearly labeled indicating the PTI name and number. Submit **hard copy items to Pam McGraner**, AQM&P, DAPC, Central Office, and electronic files to airpti@epa.state.oh.us

Please fill out the following. If the checkbox does not work, replace it with an 'X'

	<u>Electronic</u>	<u>Additional information File Name Convention (your PTI # plus this letter)</u>	<u>Hard Copy</u>	<u>None</u>
<u>Calculations (required)</u>	<input type="checkbox"/>	000000c.wpd	<input checked="" type="checkbox"/>	
<u>Modeling form/results</u>	<input type="checkbox"/>	000000s.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>PTI Application (complete or partial)*</u>	<input type="checkbox"/>	000000a.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>BAT Study</u>	<input type="checkbox"/>	000000b.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<u>Other/misc.</u>	<input type="checkbox"/>	000000t.wpd	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Mandatory for netting, PSD, nonattainment NSR, 112(g), 21-07(G)(9)(g) and 21-09(U)(2)(f) - 2 complete copies.

Please complete (see comment bubble to the left for additional instructions):

NSR Discussion

A. Source Description

Sonoco has submitted a PTI application for the proposed modification to Boiler # 2. This facility is a major facility(SO2) for PSD applicability purposes and is located in Fairfield County, which is attainment for all criteria pollutants. Currently this emissions unit burns only fuel oil. As a result of the proposed modification, this emissions unit will burn both natural gas and # 2 fuel Oil.

B. Facility Emissions and Attainment Status

The proposed emissions unit is subject to OAC rules 3745-17-07 and 3745-17-10 because it will emit particulate and is a boiler. As a result, both of these rules appear along with the corresponding emission limitations in the permit. OAC rule 3745-18-06(D) also applies. Due to the BAT restriction of natural gas and .5% sulfur content fuel oil, compliance with this rule should not be an issue. BAT for this emissions unit is the use of low Nox burners. The proposed hourly allowable emission limits reflect the use of low Nox burners. See the attached calculations.

This modification triggers the requirements of NSPS subpart Dc. As a result, this permit cites the NSPS subpart as an applicable rule . A review of the applicable NSPS standard indicates that the number of NSPS requirements is limited given the fact that this emissions unit will burn natural gas and # 2 fuel oil

w/ a sulfur content less than .5 %. However, the permit does contain a comprehensive set of parametric monitoring, recordkeeping and reporting terms and conditions so as to ensure compliance with the permitted emission limits.

C. Source Emissions

The proposed emission limits represent an increase (6.87 tons of CO per year and less than 1 ton of VOC per year) in the current allowable annual emissions. The potential emissions from the proposed modification are therefore below those levels which would trigger PSD requirements. Compliance with the proposed PM, Nox and CO emission limits will be verified through emissions testing. AP-42 emission factors and fuel sampling analysis will be used to verify compliance with the proposed SO2 and VOC emissions limits. Please call me if you have any questions(728-3813).

D. Conclusion

The proposed emission limits represent an increase in potential emissions less than those levels which would trigger federal PSD permitting requirements. Therefore , PSD does not apply. This source has a maximum heat input rating of 33.5 MMBTU per hour. Given the fact that this facility operates in SIC code 2631, the fee for this emissions unit is \$ 400. Therefore , the total fee for the PTI is \$ 400.

Please complete for these type permits (For PSD/NSR Permit, place mouse over this text):

Synthetic Minor Determination and/or Netting Determination
Permit To Install ENTER PTI NUMBER HERE

A. Source Description

B. Facility Emissions and Attainment Status

C. Source Emissions

D. Conclusion

PLEASE PROVIDE ADDITIONAL NOTES OR COMMENTS AS NECESSARY:

NONE

Please complete:

NEW SOURCE REVIEW FORM B

PTI Number: 01-08204 Facility ID: 0123010150

FACILITY NAME Sonoco

FACILITY DESCRIPTION Cleaver Brooks Boiler #2. CITY/TWP Lancaster

SIC CODE 2631 SCC CODE 1-02-006-02 EMISSIONS UNIT ID B002

EMISSIONS UNIT DESCRIPTION Boiler # 2

DATE INSTALLED Upon PTI issuance

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	.45	1.971	.45	1.971
PM ₁₀					
Sulfur Dioxide	attainment	15.87	69.5	15.87	69.5
Organic Compounds	attainment	.2	.77	.2	.77
Nitrogen Oxides	attainment	4.47	19.6	4.47	19.6
Carbon Monoxide	attainment	2.69	11.77	2.69	11.77
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? Subpart Dc

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Enter Determination Compliance with the permitted emission limits and applicable rules; Use of low Nox burners; OAC rule 3745-31-05

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ 43,000

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES x NO

IDENTIFY THE AIR CONTAMINANTS: _____