



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

5/5/2010

Pamela Blakley *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Smart Papers - Hamilton Mill
Facility ID: 1409040212
Permit Type: Renewal
Permit Number: P0105122

Dear Ms. Blakley:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.ohio.gov/dapc> in Microsoft Word and Adobe Acrobat format. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-3631 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Hamilton County Dept. of Environmental Services



PROPOSED

Division of Air Pollution Control Title V Permit for Smart Papers - Hamilton Mill

Facility ID: 1409040212
Permit Number: P0105122
Permit Type: Renewal
Issued: 5/5/2010
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Smart Papers - Hamilton Mill

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Proposed Title V Permit

Permit Number: P0105122

Facility ID: 1409040212

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1409040212

Facility Description: Paper mill for manufacturing high quality paper

Application Number(s): A0028632

Permit Number: P0105122

Permit Description: Title V Operating Permit Renewal for paper mill manufacturing high quality paper.

Permit Type: Renewal

Issue Date: 5/5/2010

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Superseded Permit Number: P0097000

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Smart Papers - Hamilton Mill
601 North 'B' Street
Hamilton, OH 45013-2909

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Hamilton County Dept. of Environmental Services. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Proposed Title V Permit

Permit Number: P0105122

Facility ID: 1409040212

Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions
 - (2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions
 - (3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting
 - (4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))
- 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 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))



c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or



local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

- (3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed



adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

- (4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))
- (5) Reports of any required monitoring and/or record keeping information shall be submitted to Hamilton County Dept. of Environmental Services.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))



5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. 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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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, in accordance with Standard Term and Condition A.11 below. 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.
- f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:
 - (1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in



OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

- (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
- (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.



- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.
(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. 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.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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:
 - (1) 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.
 - (2) 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 paragraph (E) of OAC rule 3745-77-03.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) 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.

- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
 - (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. An identification of each term or condition of this permit that is the basis of the certification.
 - b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - (3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

- a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.



- b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.
(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.
(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.



- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that



emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

- 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.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) 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, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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 (i.e., postmarked) quarterly, 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.)



25. Records Retention Requirements Under State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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 verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. 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 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. 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 emissions unit(s) that is (are) served by such control system(s).

28. 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.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.



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Effective Date: To be entered upon final issuance

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or
- b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c) where the company's responsible official has certified that an emissions unit has been permanently shut down.



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B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) 7.

2. Non-Applicability Determinations

Ohio EPA has determined that the requirements specified in the following list are not applicable as the facility existed on the date of issuance of this permit.

a) List of Negative Declarations - Federal Non-applicable Requirements

(1) 40 CFR Part 63, Subpart N;

(2) 40 CFR Part 63, Subpart Q;

(3) 40 CFR Part 68;

(4) 40 CFR Part 82, Subparts A through E, Subparts G and H; and

(5) 40 CFR Part 63, Subpart JJJJ (for emissions units K004, K005, K006, and K007 only, pursuant to November 19, 2003, Subpart JJJJ Applicability Determination letter, issued by Michael S. Alushin, Director, US EPA Assistant Administrator for Enforcement and Compliance Assurance, addressing size presses and on-machine coaters used by the papermaking industry as not subject to the requirements of Subpart JJJJ).

b) List of Negative Declarations - Emissions Unit(s) and Ohio Non-applicable Requirements

(1) F003, K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, and K026: OAC rule 3745-17-11.

(2) K001, K002, K003, K004, K005, K006, K007, K008, K009, K010, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, and K026: OAC rule 3745-21-07.

(Authority for term: OAC rule 3745-77-07(F)(2))

3. All asbestos renovation and demolition activities conducted at this facility shall be performed in accordance with the applicable requirements specified in 40 CFR Part 61, Subpart M, and OAC Chapter 3745-20.

(Authority for term: 40 CFR Part 61.145 and OAC rule 3745-20-02)

4. The permittee shall maintain, service, repair, or dispose of equipment containing any class I or class II substance used as refrigerant in such equipment pursuant to the applicable provisions of 40 CFR Part 82, Subpart F.

(Authority for term: 40 CFR Part 82.150)

5. MACT Requirements



The permittee may be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD. U.S. EPA initially promulgated these standards on September 13, 2004, with a compliance date of September 13, 2007. On July 30, 2007, these standards were vacated by mandate of the U.S. Court of Appeals for the District of Columbia Circuit. Until such time as a MACT determination is established for affected sources in this category, the permittee shall comply with the Ohio Air Toxics Policy, pursuant to ORC 3704.03 (F), and Compliance Assurance Monitoring (CAM) requirements, pursuant to 40 CFR Part 64, for applicable emissions units in this category, as specified in Section C. of this permit.

6. The following insignificant emissions units are located at this facility:

L001 - Parts washers;

P036 - Sand blaster; and

P037 - Grinders, sanders, lathes.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

(Authority for term: OAC rule 3745-77-07(A)(13))

7. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimus" criteria established in OAC rule 3745-15-05:

F001 - Paved Roadways and Parking Areas;

F013 - Coal Storage;

P021 - No. 2 & 3 Paper Machine Chemical Addition;

P022 - No. 9 & 10 Paper Machine Chemical Addition;

P024 - No. 2 & 3 Paper Machine Raw Materials;

P025 - No. 2 & 3 Paper Machine Fillers and Additives;

P027 - No. 9 & 10 Paper Machine Raw Materials;

P028 - No. 9 & 10 Paper Machine Fillers and Additives;

P029 - Super Calendar Complex Re-reeler and Winder;

P030 - No. 1 Mill Rewinders;

P031 - No. 1 Mill Balers;

P039 - Core Cutters;



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P040 - Converting Complex (includes Embossers, Cutters, Sheeters and Broke boxes);

P901 - Kady Mill Mixers;

T008 - 18,000-gallon Storage Tank; and

T012 - 1000-gallon Fuel Oil Storage Tank.

(Authority for term: OAC rule 3745-15-05)

8. The following emissions units contained in this permit are subject to 40 CFR Part 63, Subpart JJJJ, National Emission Standards for Hazardous Air Pollutants for Paper and Other Web Surface Coating Operations: K001, K002, K003, K008, K009, K010, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, and K026. The complete MACT requirements including the MACT General Provisions may be access via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District office or local air agency.

The permittee shall comply with all applicable requirements of 40 CFR Part 63, Subpart JJJJ. The permittee shall also comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 1 of 40 CFR Part 63, Subpart JJJJ. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart JJJJ, and Subpart A.

(Authority for term: 40 CFR Part 63, Subpart JJJJ)



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C. Emissions Unit Terms and Conditions



1. B010, No. 10 Boiler CH11002

Operations, Property and/or Equipment Description:

No. 10 Boiler, a 420 mmBtu/hour pulverized-dry bottom coal-fired boiler, with No. 2 fuel oil burners for ignition and supplemental firing, controlled by an electrostatic precipitator (ESP)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rules 3745-31-10 through 3745-31-20 (PTI 14-05962) Prevention of Significant Deterioration	See b)(2)a. and g)(1).
b.	OAC Chapter 3745-14 Nitrogen Oxides (NOx) Budget Trading Program	See b)(2)c. through b)(2)y.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
d.	OAC rule 3745-17-10(C)(1)	Particulate emissions (PE) shall not exceed 0.11 pound per mmBtu of actual heat input.
e.	OAC rule 3745-18-15(L)	Sulfur dioxide (SO2) emissions shall not exceed 1.7 pounds per mmBtu of actual heat input. See c)(1).
f.	OAC Chapter 3745-103 Acid Rain Permits and Compliance	Exempt. See b)(2)b. and d)(1).
g.	40 CFR Part 63, Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for	See Section B.5. of this permit.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	Industrial, Commercial, and Institutional Boilers and Process Heaters	
h.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See d)(5), d)(6), d)(9)-d)(13), e)(3), and e)(6).

(2) Additional Terms and Conditions

- a. The maximum allowable SO₂ emissions rate of this emissions unit will not cause or contribute to a violation of a National Ambient Air Quality Standard (NAAQS) and/or Prevention of Significant Deterioration (PSD) increment based upon the permittee's air dispersion modeling information submitted on September 26, 2007, to Ohio EPA.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rules 3745-31-10 through 3745-31-20)

- b. This emissions unit is exempt from the acid rain program requirements in OAC Chapter 3745-103 pursuant to the gross electric sales exemption threshold for a cogeneration facility specified in OAC rule 3745-103-02(B)(4)(b). The permittee shall maintain records as specified in d)(1) to demonstrate compliance with the following exemption threshold:

- i. average annual electric sales to the utility power distribution system shall not exceed more than one-third of potential electrical output capacity; or
- ii. actual electric output (on a gross basis) shall not exceed 219,000 MWe-hours.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-103-02(B)(4)(b))

- c. Office of Regulatory Information System Facility Code – 50247

This regulated non-electrical generating emissions unit is subject to the applicable requirements specified in OAC Chapter 3745-14 and the annual NO_x allowance allocation listed below:

Annual Allowance
for Calendar Years
2008 through 2012

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Pursuant to OAC rule 3745-14-05(B)(2), the annual NO_x allowance allocations for this emissions unit for calendar years 2013 through 2018 will be established in accordance with OAC rules 3745-14-05(C)(1) and 3745-14-05(C)(2).



- d. This emissions unit is identified as a NOx budget unit under OAC rule 3745-14-01(C)(1).

(Authority for term: OAC rule 3745-14-01(C)(1)(a)(i))
- e. The NOx authorized account representative shall submit a complete NOx budget permit application in accordance with the deadlines specified in paragraphs (B)(2) and (B)(3) of OAC rule 3745-14-03. The NOx authorized account representative shall also submit, in a timely manner, any supplemental information that the Director determines is necessary in order to review a NOx budget permit application and issue or deny a NOx budget permit.

(Authority for term: OAC rules 3745-14-01(E)(1)(a)(i), 3745-14-01(E)(1)(a)(ii), and 3745-14-03(B)(1))
- f. Beginning May 31, 2004, the owners and operators of each NOx budget source and each NOx budget unit at the source shall hold NOx allowances available for compliance deductions under paragraph (E) of OAC rule 3745-14-06, as of the NOx allowance transfer deadline, in the unit's compliance account and the source's overdraft account in an amount not less than the total NOx emissions for the control period from the unit, as determined in accordance with OAC rule 3745-14-08, plus any amount necessary to account for actual utilization under paragraph (C)(5) of OAC rule 3745-14-05 for the control period.

(Authority for term: OAC rules 3745-14-01(E)(3)(a) and 3745-14-01(E)(3)(c))
- g. NOx allowances shall be held in, deducted from, or transferred among NOx allowance tracking system accounts in accordance with OAC rules 3745-14-05, 3745-14-06, 3745-14-07, and 3745-14-09.

(Authority for term: OAC rule 3745-14-01(E)(3)(d))
- h. A NOx allowance shall not be deducted, in order to comply with the requirement under paragraph (E)(3)(a) of OAC rule 3745-14-01, for a control period in a year prior to the year for which the NOx allowance was allocated.

(Authority for term: OAC rule 3745-14-01(E)(3)(e))
- i. Each ton of NOx emitted in excess of the NOx budget emission limitation, as defined in OAC rule 3745-14-01(B)(2)(yy), shall constitute a separate violation of OAC Chapter 3745-14, the Clean Air Act, and applicable Ohio law. The owners and operators of a NOx budget unit that has excess emissions in any control period shall surrender the NOx allowances required for deduction under paragraph (E)(4)(a) of OAC rule 3745-14-06 and pay any fine, penalty, or assessment or comply with any other remedy imposed under paragraph (E)(4)(c) of OAC rule 3745-14-06.

(Authority for term: OAC rules 3745-14-01(E)(3)(b), 3745-14-01(E)(4)(a) and 3745-14-01(E)(4)(b))
- j. When recorded by the Administrator pursuant to OAC rules 3745-14-06 and 3745-14-07, every allocation, transfer, or deduction of a NOx allowance to or



from a NOx budget unit's compliance account or the overdraft account of the source where the unit is located is deemed to amend automatically, and become a part of, any NOx budget permit of the NOx budget unit by operation of law without any further review.

(Authority for term: OAC rule 3745-14-01(E)(3)(h))

- k. Except as provided below, the Director shall revise the NOx budget permit, as necessary, in accordance with OAC rule 3745-77-08.

Each NOx budget permit is deemed to incorporate automatically the definitions of terms under paragraph (B) of OAC rule 3745-14-01 and, when recorded by the Administrator, in accordance with OAC rules 3745-14-06 and 3745-14-07, every allocation, transfer, or deduction of a NOx allowance to or from the compliance accounts of the NOx budget units covered by the permit or the overdraft account of the NOx budget source covered by the permit.

(Authority for term: OAC rules 3745-14-03(D)(2) and 3745-14-03(E)(1))

- l. The owner or operator of a NOx budget unit shall comply with the prohibitions under OAC rule 3745-14-08(A)(5).

(Authority for term: OAC rule 3745-14-08(A)(5))

- m. The owners and operators of the NOx budget unit shall keep on site at the source each of the following documents for a period of five years from the date the document is created (this period may be extended for cause, at any time prior to the end of five years, in writing by the Director or Administrator):

- i. the account certificate of representation for the NOx authorized account representative for the NOx budget unit and all documents that demonstrate the truth of the statements in the account certificate of representation, in accordance with paragraph (D) of OAC rule 3745-14-02, provided that the certificate and documents shall be retained on site at the source beyond such five-year period until such documents are superseded because of the submission of a new account certificate or representation changing the NOx authorized account representative;
- ii. all emission monitoring information, in accordance with OAC rule 3745-14-08;
- iii. copies of all reports, compliance certifications, and other submissions and all records made or required under the NOx budget trading program; and
- iv. copies of all documents used to complete a NOx budget permit application and any other submission under the NOx budget trading program or to demonstrate compliance with the requirements of the NOx budget trading program.

(Authority for term: OAC rule 3745-14-01(E)(5)(a)(i) through (iv))



- n. The permittee shall operate and maintain equipment to continuously monitor and record nitrogen oxides emissions from these emissions units in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software. This includes all systems required to monitor the NOx emission rate, NOx concentration, heat input rate, and stack flow rate, in accordance with 40 CFR Parts 75.71 and 75.72.

The permittee shall comply with the initial and re-certification procedures of 40 CFR Part 75. The permittee shall maintain on-site documentation from the USEPA or the Ohio EPA that the continuous nitrogen oxides monitoring system has been certified in accordance with 40 CFR Part 75. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous nitrogen oxides monitoring system: emissions of nitrogen oxides in lb/mmBtu actual heat input on an hourly average basis, emissions of nitrogen oxides in lbs/hr, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

Whenever the monitoring system fails to meet the quality assurance or data validation requirements of 40 CFR Part 75, data shall be substituted using the applicable procedures in Subpart D, Appendix D, or Appendix E of 40 CFR Part 75.

(Authority for term: OAC rules 3745-14-01(E)(2)(a), 3745-14-01(E)(5)(a)(ii), 3745-14-08(A)(2)(a) through (A)(2)(d), 3745-14-08(B)(1), and 3745-14-08(C)(1))

- o. The permittee shall comply with the monitoring plan requirements of 40 CFR Part 75.62, except that the monitoring plan shall also include all of the information required by Subpart H of 40 CFR Part 75.

(Authority for term: OAC rule 3745-14-08(E)(2)(a))

- p. The NOx authorized account representative of the NOx budget unit shall submit the reports and compliance certifications required under the NOx budget trading program, including those under OAC rules 3745-14-04 and 3745-14-08, to the Director and Administrator.

(Authority for term: OAC rule 3745-14-01(E)(5)(b))

- q. Each submission under the NOx budget trading program shall be submitted, signed, and certified by the NOx authorized account representative for each NOx budget source on behalf of which the submission is made. Each such submission shall include the following certification statement by the NOx authorized account representative:



"I am authorized to make this submission on behalf of the owners and operators of the NOx budget sources or NOx budget units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

If the NOx authorized account representative for a NOx budget unit subject to an acid rain emission limitation who signed and certified any submission that is made under Subpart F or G of 40 CFR Part 75 and which includes data and information required under OAC rule 3745-14-08 or Subpart H of 40 CFR Part 75 is not the same person as the designated representative or the alternate designated representative for the unit under 40 CFR Part 72, then the submission shall also be signed by the designated representative or the alternate designated representative.

(Authority for term: OAC rules 3745-14-02(A)(5) and 3745-14-08(E)(1)(b))

- r. The NOx authorized account representative shall submit quarterly reports that include all of the data and information required in Subpart H of 40 CFR Part 75 for each NOx budget unit (or group of units using a common stack) and the data and information in Subpart G of 40 CFR Part 75. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30 and October 30 of each year and shall be submitted in the manner specified in Subpart H of 40 CFR Part 75 and 40 CFR Part 75.64.

(Authority for term: OAC rules 3745-14-08(E)(4)(a) and 3745-14-08(E)(4)(c)(i))

- s. The NOx authorized account representative shall submit to the Administrator a compliance certification in support of each quarterly report based on a reasonable inquiry of those persons with primary responsibility for ensuring that all of the unit's emissions are correctly and fully monitored. The compliance certification shall state that:
 - i. the monitoring data submitted were recorded in accordance with the applicable requirements of OAC rule 3745-14-08 and 40 CFR Part 75, including the quality assurance procedures and specifications; and
 - ii. for a unit with add-on NOx emission controls and for all hours where data are substituted in accordance with 40 CFR Part 75.34(a)(1), the add-on emission control were operating within the range of parameters listed in the quality assurance program under Appendix B of 40 CFR Part 75 and the substitute values do not systematically underestimate the NOx emissions.

(Authority for term: OAC rule 3745-14-08(E)(4)(d)(i) and (ii))



- t. The NOx authorized account representative for a NOx budget unit shall submit written notice of monitoring system certification and re-certification test dates to the Director and the Administrator in accordance with 40 CFR Part 75.61. The NOx authorized account representative shall submit a certification application to the Administrator, U.S. EPA, Region V Office, and the Director within forty-five days after completing all initial or re-certification tests required under paragraph (B) of OAC rule 3745-14-08, including the information required under Subpart H of 40 CFR Part 75.

(Authority for term: OAC rules 3745-14-08(D) and 3745-14-08(E)(3))

- u. For each control period in which one or more NOx budget units at a source are subject to the NOx budget emission limitation, the NOx authorized account representative of the source shall submit to the Director and the Administrator, by November 30 of that year, a compliance certification report for each source covering all such units.

The NOx authorized account representative shall include the following elements in the compliance certification report, in a format prescribed by the Administrator, concerning each unit at the source and subject to the NOx budget emission limitation for the control period covered by the report:

- i. identification of each NOx budget unit;
- ii. at the NOx authorized account representative's option, the serial numbers of the NOx allowances that are to be deducted from each unit's compliance account under paragraph (E) of OAC rule 3745-14-06 for the control period;
- iii. at the NOx authorized account representative's option, for units sharing a common stack and having NOx emissions that are not monitored separately or apportioned in accordance with OAC rule 3745-14-08, the percentage of allowances that is to be deducted from each unit's compliance account under paragraph (E)(5) of OAC rule 3745-14-06; and
- iv. the compliance certification under paragraph (A)(3) of OAC rule 3745-14-04.

(Authority for term: OAC rules 3745-14-04(A)(1) and 3745-14-04(A)(2))

- v. In the compliance certification report under b)(2)u. above, the NOx authorized account representative shall certify, based upon reasonable inquiry of those persons with the primary responsibility for operating the source and the NOx budget units at the source in compliance with the NOx budget trading program, whether each NOx budget unit for which the compliance certification is submitted was operated during the calendar year covered by the report in compliance with the requirements of the NOx budget trading program applicable to the unit, including all the following:

- i. whether the unit was operated in compliance with the NOx budget emission limitation;



- ii. whether the monitoring plan that governs the unit has been maintained to reflect the actual operation and monitoring of the unit, and contains all information necessary to attribute NO_x emissions to the unit, in accordance with OAC rule 3745-14-08;
- iii. whether all the NO_x emissions from the unit, or group of units (including the unit) using a common stack, were monitored or accounted for through the missing data procedures and reported in the quarterly monitoring reports, including whether conditional data were reported in the quarterly reports in accordance with OAC rule 3745-14-08, and if conditional data were reported, the permittee shall indicate whether the status of all conditional data has been resolved and all necessary quarterly report submissions have been made; and
- iv. whether the facts that form the basis for certification under OAC rule 3745-14-08 of each monitor at the unit or group of units (including the unit) using a common stack, or for using an excepted monitoring method or alternative monitoring method approved under OAC rule 3745-14-08, if any, have changed.

If a change is required to be reported under b)(2)v.iv. above, specify the nature of the change, the reason for the change, when the change occurred, and how the unit's compliance status was determined subsequent to the change, including what method was used to determine emissions when a change mandated the need for monitor re-certification.

(Authority for term: OAC rule 3745-14-04(A)(3))

- w. The emission measurements recorded and reported in accordance with OAC rule 3745-14-08 shall be used to determine compliance by the unit with the NO_x budget emission limitation under paragraph (E)(3) of OAC rule 3745-14-01.

(Authority for term: OAC rule 3745-14-01(E)(2)(b))

- x. The permittee shall develop and maintain a written quality assurance/quality control plan for each continuous NO_x monitoring system designed to ensure continuous valid and representative readings of NO_x emissions in units of the applicable standard. The plan shall follow the requirements of 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous NO_x monitoring system must be kept on-site and available for inspection during regular office hours.

(Authority for term: OAC rules 3745-14-08(A)(2)(c) and 3745-14-08(A)(2)(d))

- y. The NO_x authorized account representative shall submit a complete NO_x budget permit renewal application for the NO_x budget source covering the NO_x budget units at the source in accordance with paragraph (E) of OAC rule 3745-77-08.

(Authority for term: OAC rule 3745-14-03(B)(3)(a))

- z. Within 180 days of the effective date of this permit, the permittee shall develop and maintain a written quality assurance/quality control plan for the continuous



opacity monitoring system, designed to ensure continuous valid and representative readings of opacity and compliance with 40 CFR Part 60. The plan shall include, at a minimum, procedures for conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring accurate operation of the continuous opacity monitoring system on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-03(B)(1)(b), 40 CFR 60.13, and 40 CFR Part 60, Appendix F)

- aa. The continuous opacity monitoring system consists of all the equipment used to acquire data and record opacity.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-03(B)(1)(b), 40 CFR 60.2, and 40 CFR Part 60, Appendix B)

c) Operational Restrictions

- (1) The total combined daily average operating rate for emissions units B010 and B020 shall not exceed 603 mmBtu per hour.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-18-15(L))

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain annual records, on a calendar year basis, of the following information to demonstrate that this emissions unit is not an affected unit under the acid rain program:

- a. the potential electrical output capacity of emissions units B010 and B020;
- b. the average electric sales to the utility power distribution system;
- c. the percentage of average electric sales as compared to the potential electrical output capacity; and
- d. the total actual electric output (on a gross basis), in MWe-hours.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-103-02(B)(4)(b))

- (2) This permittee shall collect or require the coal supplier to collect a representative sample of coal for each shipment of coal which is received for burning in this emissions unit. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each month, the representative samples of coal from all shipments of coal which were received during that month shall be combined into one composite sample. This combination may be a physical composite or a weighted average of the test data for the individual shipments.



Each monthly composite sample of coal shall be analyzed for sulfur content (percent) and heat content (Btu/pound of coal). The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the most recent version of the following ASTM methods: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865, Gross Calorific Value of Coal and Coke. Alternative, equivalent methods may be used upon written approval from the Hamilton County Department of Environmental Services.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(D))

- (3) The permittee shall maintain monthly records of the total quantity of coal burned, the results of the analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in pounds per mmBtu), for all shipments of coal during each calendar month. The sulfur dioxide emission rate is based upon a volume-weighted average as calculated per the equation in OAC rule 3745-18-04(F)(1).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(D))

- (4) The permittee shall maintain daily records of the total combined heat input, total combined hours of operation (calculated by the sum of the operating hours for each unit), and the daily average operating rate, in mmBtu per hour, for emissions units B010 and B020. To determine the heat input, the permittee shall continuously monitor and record the steam flow rate from this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(I))

- (5) The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of particulate emissions from the common stack serving B010 and B020. The opacity of the visible particulate emissions from B010 and B020 shall be monitored in the combined stack for the two boilers and the visible particulate emission limitation specified in b)(1)c. applies to each individual boiler as monitored at the common stack. An exceedance of the visible emissions limitation in b)(1)c. as measured at the common stack does not necessarily constitute an exceedance of the emissions limitation for both boilers. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of data obtained by the continuous opacity monitoring system including, but not limited to:

- a. percent opacity on an instantaneous (one-minute or less) and 6-minute block average basis;
- b. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- c. hours of operation of the emissions unit, continuous opacity monitoring system, and control equipment;
- d. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous opacity monitoring system;



- e. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous opacity monitoring system; as well as, and
- f. the reason (if known) and the corrective actions taken (if any) for each such event in d. and e. above.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-03(B)(1)(b), 40 CFR Part 60.13, 40 CFR Part 60, Appendices B & F, and 40 CFR Part 64)

- (6) The permittee shall maintain on-site, the document of certification received from the U.S. EPA or the Ohio EPA's Central Office verifying that the continuous opacity monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter/document of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-03(B)(1)(b), 40 CFR Part 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 64)

- (7) To obtain an exemption pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain temperature monitors and recorders that measure and record the temperature of the boiler exhaust gases entering the ESPs during (a) all periods of start-up until the ESPs are operational or until the inlet temperatures of the ESPs achieve the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b) all periods of shutdown until the inlet temperatures of the ESPs drop below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i). An electronic or hardcopy record of the temperatures during periods of start-up and shutdown shall be maintained.

The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in units of degrees Fahrenheit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)(3))

- (8) The permittee shall maintain the following records for emissions units B010, B020, F003, P019, and all de minimus emissions units (i.e. cooling tower) associated with the Cogeneration Expansion Project, as described in the application for Permit to Install (PTI) #14-05962, submitted July 20, 2007, in order to demonstrate that the Cogeneration Expansion Project does not trigger major modification for PE, PM10/PM2.5, NOx, CO, and VOC:

- a. the projected actual annual emissions for PE, PM10/PM2.5, NOx, CO, and VOC, in tons per year, from the Cogeneration Expansion Project; and



- b. the total actual annual emissions of PE, PM10/PM2.5, NOx, CO, and VOC, in tons per year, from emission units B010, B020, F003, P019, and all de minimus emissions units (i.e. cooling tower) associated with the Cogeneration Expansion Project, combined, for the 5 calendar years after commencing operation of the Cogeneration Expansion Project.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-10(A))

- (9) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for particulate emissions, until the compliance date in 40 CFR Part 63, Subpart DDDDD, are the opacity of the visible particulate emissions from the electrostatic precipitator exhaust stack and the electrostatic precipitator power parameters (primary/secondary amperage and primary/secondary voltage) indicator ranges.

Stack opacity is measured and recorded by the certified continuous opacity monitoring (COM) system. The visible particulate emissions indicator range is each six-minute block average with an opacity value greater than 15%. When the opacity value is greater than 15% for two consecutive averaging periods, corrective action (including, but not limited to, an evaluation of the emissions unit and electrostatic precipitator) will be required.

The electrostatic precipitator may be evaluated by checking the power parameters (primary/secondary amperage and primary/secondary voltage) for the ESP's eight fields to ensure that they are operating within the indicator ranges below. The electrostatic precipitator power parameter indicator ranges for normal operation are:

<u>Parameter</u>	<u>Range</u>
Primary Current	5 - 61 amps
Primary Voltage	196 - 460 volts
Secondary Current	40 - 510 milli-amps
Secondary Voltage	9.4 - 36.7 kilovolts

The indicator range noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the ranges above based upon information obtained during future emission tests that demonstrate compliance with the emission limitations for this emissions unit. In addition, approved revisions to the ranges will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

- (10) When the opacity exceeds 15% for two consecutive six-minute averaging periods and one of the power parameters is outside of the indicator ranges above, corrective action focused on the ESP will be required. When opacity exceeds 15% for two consecutive six-minute averaging periods and the power parameters are within the indicator ranges above, corrective action focused on the emission unit will be required.



Upon detecting an excursion of the visible particulate emission value above 15% opacity for two consecutive six-minute averaging periods, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

- (11) Whenever the monitored values for the opacity and/or ESP parameters deviate from the indicator range specified in d)(9) in a manner as defined in d)(10), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began and ended;
 - b. the magnitude of the deviation;
 - c. the date(s) the investigation was conducted;
 - d. the names of the personnel who conducted the investigation; and
 - e. the findings and recommendations of the investigation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

- (12) In response to each required investigation required in d)(11) to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the indicator range specified in d)(9). The permittee shall maintain records of the following information for each corrective action taken:
- a. a description of the corrective action;
 - b. the date and time the corrective action was completed; and
 - c. the names of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

- (13) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.



(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

- (14) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-05962, issued on January 31, 2008: d)(1) through d)(13). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly reports on the quality and quantity of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
 - a. the total quantity of coal received (tons);
 - b. the average ash content (percent) of the coal received;
 - c. the average sulfur content (percent) of the coal received;
 - d. the average heat content (Btu/pound) of the coal received; and
 - e. the average sulfur dioxide emission rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received.

Compliance with the sulfur dioxide emission limit shall be determined each month by calculating the average monthly sulfur dioxide emission rate, using the results of the analyses of the monthly composite sample for sulfur content and heat content.

These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall cover the data obtained during the previous calendar quarters.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(D))

- (2) The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify each exceedance of the total combined operating rate limitation specified in c)(1).

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1))

- (3) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous opacity monitoring system:
 - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio



EPA District Office or local air agency, documenting all instances of opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, OAC rule 3745-17-07, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance.

- b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
- i. the facility name and address;
 - ii. the manufacturer and model number of the continuous opacity monitor;
 - iii. a description of any change in the equipment that comprises the continuous opacity monitoring system (COMS), including any change to the hardware, changes to the software that may affect COMS readings, and/or changes in the location of the COMS sample probe;
 - iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
 - v. the total operating time (hours) of the emissions unit;
 - vi. the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;
 - vii. the date, time, and duration of any/each malfunction** of the continuous opacity monitoring system, emissions unit, and/or control equipment;
 - viii. the date, time, and duration of any downtime** of the continuous opacity monitoring system and/or control equipment while the emissions unit was in operation; and
 - ix. the reason (if known) and the corrective actions taken (if any) for each event in vii. and viii. above.

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* where no exceedance of the opacity limit has occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the quarterly EER report

** each downtime and malfunction event shall be reported regardless if there is an exceedance of the opacity limit

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 60.7, and 40 CFR Part 64)



- (4) The permittee shall notify the Hamilton County Department of Environmental Services in writing if in any three calendar year period this unit sells to a utility power distribution system an annual average of more than one-third of its potential electrical output capacity and more than 219,000 MWe-hours actual electric output (on a gross basis). This notification shall identify the cause for the exceedance and the estimated gross sales in MWe-hours and as a percentage of potential electrical capacity. This notification shall be submitted to the Hamilton County Department of Environmental Services within 60 days after the end of such three calendar year period.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-103-02(B)(4)(b))

- (5) The permittee shall notify the Hamilton County Department of Environmental Services in writing if annual emissions from all emissions units in the Cogeneration Expansion Project, as specified in d)(8), result in a significant PE, PM10/PM2.5, NOx, CO, and/or VOC emissions increase and exceed the projected actual PE, PM10/PM2.5, NOx, CO, and VOC emissions contained in the application for PTI #14-05962, submitted July 20, 2007. This notification shall identify the cause for the significant emissions increase and the estimated PE, PM10/PM2.5, NOx, CO, or VOC emissions. This notification shall be submitted to the Hamilton County Department of Environmental Services within 60 days after the end of such year.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-10(A)(5))

- (6) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the ESP and visible emissions from this emissions unit(s):
- a. each period of time (start time and date, and end time and date) when the visible emissions and/or ESP operating parameters were outside of the range specified in d)(9) in a manner as defined in d)(10);
 - b. an identification of each incident of deviation described in e)(6)a. where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in e)(6)a. where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the ESP indicator ranges defined in d)(9) into an acceptable range, was determined to be necessary and was not taken; and
 - d. an identification of each incident of deviation described in e)(6)a. where proper records were not maintained for the investigation and/or the corrective action(s).

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

- (7) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to



Install #14-05962, issued on January 31, 2008: e)(1) through e)(6). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Visible Particulate Emission Limitation:

As specified in b)(1)c.

Applicable Compliance Method:

Ongoing compliance with the opacity limitation contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 60.13, and 40 CFR Part 60, Appendices B & F)

b. Particulate Emission Limitation:

As specified in b)(1)d.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the particulate emission testing required in f)(2) below.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(9))

c. Sulfur Dioxide Emission Limitation:

As specified in b)(1)e.

Applicable Compliance Method:

Compliance shall be determined by using the fuel analysis records required pursuant to d)(2) and d)(3) and the applicable equation in OAC rule 3745-18-04(F).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(D))



- d. Acid Rain Program exemption thresholds as defined in b)(2)b.

Compliance shall be determined by the information collected and recorded in d)(1).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-103-02(B)(4)(b))

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

- a. the emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit renewal;
- b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates;
- c. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9);
- d. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity;
- e. not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s);
- f. personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and
- g. a comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report. The request may be granted, where warranted, if submitted prior to testing and with prior approval from the Hamilton County Department of Environmental Services.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(9))

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05962, issued on January 31, 2008: f)(1) and f)(2). The testing requirements



contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) The Cogeneration Expansion Project approved under PTI #14-05962, issued January 31, 2008, resulted in debottlenecking and/or utilization increases of several existing emissions units at the facility. The projected SO₂ actual emissions increases from the existing coal-fired boilers, emissions units B010 and B020, as described in the application for PTI #14-05962, submitted on July 20, 2007, triggered the definition of significant increase and significant net emission increase as defined in OAC rule 3745-31-01(III); therefore, emissions units B010 and B020 were subject to PSD review under New Source Review (NSR) major modification requirements.

The permittee provided a PSD Assessment and Modeling Analysis for the existing coal-fired boilers with the application for PTI #14-05962, submitted on July 20, 2007, and revised on September 26, 2007. The SO₂ emission increases from the boilers did not exceed the existing allowable emission limitations which demonstrated compliance with the PSD requirements, OAC rules 3745-31-10 through 3745-31-20.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rules 3745-31-10 through 3745-31-20)



2. B020, No. 14 Boiler CH11003

Operations, Property and/or Equipment Description:

No. 14 Boiler, a 249 mmBtu/hour spreader stoker coal-fired boiler, controlled by an electrostatic precipitator (ESP)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) d)(14), d)(15), d)(16), d)(17), and e)(3).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-05962)	<p>Particulate emissions (PE) shall not exceed 118 tons per year.</p> <p>Particulate matter 10 microns and less in diameter (PM10) and particulate matter 2.5 microns and less in diameter (PM2.5) shall not exceed 0.072 pound per mmBtu of actual heat input* and 77.2 tons per year*.</p> <p>Sulfur dioxide (SO2) emissions shall not exceed 1854 tons per year.</p> <p>Nitrogen oxides (NOx) emissions shall not exceed 163.5 pounds per hour* and 716 tons per year*.</p> <p>Carbon monoxide (CO) emissions shall not exceed 51.0 pounds per hour* and 223 tons per year*.</p> <p>Non-methane Organic Compound (NMOC) emissions shall not exceed 1.12 pounds per hour* and 4.9 tons per year*.</p> <p>* The emission limitations outlined above are based on the emissions unit's potential to emit. Therefore, no records are required to demonstrate compliance with these limitations.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(C), and OAC rule 3745-18-15(L).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
c.	OAC rule 3745-17-10(C)(1)	Particulate emissions (PE) shall not exceed 0.11 pound per mmBtu of actual heat input.
d.	OAC rule 3745-18-15(L)	Sulfur dioxide (SO ₂) emissions shall not exceed 1.7 pounds per mmBtu of actual heat input. See c)(1).
e.	OAC rules 3745-31-10 through 3745-31-20 Prevention of Significant Deterioration	See b)(2)a. and g)(1).
f.	OAC Chapter 3745-103 Acid Rain Permits and Compliance	Exempt. See b)(2)b. and d)(1).
g.	40 CFR Part 63, Subpart DDDDD National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters	See Section B.5. of this permit.
h.	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	See d)(5), d)(6), d)(9)-d)(13), e)(4), and e)(7).

(2) Additional Terms and Conditions

- a. The maximum allowable SO₂ emissions rate of this emissions unit will not cause or contribute to a violation of a National Ambient Air Quality Standard (NAAQS) and/or Prevention of Significant Deterioration (PSD) increment based upon the permittee's air dispersion modeling information submitted on September 26, 2007, to Ohio EPA.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rules 3745-31-10 through 3745-31-20)



- b. This emissions unit is exempt from the acid rain program requirements in OAC Chapter 3745-103 pursuant to the gross electric sales exemption threshold for a cogeneration facility specified in OAC rule 3745-103-02(B)(4)(b). The permittee shall maintain records as specified in d)(1) to demonstrate compliance with the following exemption threshold:
 - i. average annual electric sales to the utility power distribution system shall not exceed more than one-third of potential electrical output capacity; or
 - ii. actual electric output (on a gross basis) shall not exceed 219,000 MWe-hours.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-103-02(B)(4)(b))

- c. Within 180 days of the effective date of this permit, the permittee shall develop and maintain a written quality assurance/quality control plan for the continuous opacity monitoring system, designed to ensure continuous valid and representative readings of opacity and compliance with 40 CFR Part 60. The plan shall include, at a minimum, procedures for conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring accurate operation of the continuous opacity monitoring system on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-03(B)(1)(b), 40 CFR 60.13, and 40 CFR Part 60, Appendix F)

- d. The continuous opacity monitoring system consists of all the equipment used to acquire data and record opacity.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-03(B)(1)(b), 40 CFR 60.2, and 40 CFR Part 60, Appendix B)

c) Operational Restrictions

- (1) The total combined daily average operating rate for emissions units B010 and B020 shall not exceed 603 mmBtu per hour.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-18-15(L))

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain annual records, on a calendar year basis, of the following information to demonstrate that this emissions unit is not an affected unit under the acid rain program:

- a. the potential electrical output capacity of emissions units B010 and B020;
- b. the average electric sales to the utility power distribution system;



- c. the percentage of average electric sales as compared to the potential electrical output capacity; and
- d. the total actual electric output (on a gross basis), in MWe-hours.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-103-02(B)(4)(b))

- (2) This permittee shall collect or require the coal supplier to collect a representative sample of coal for each shipment of coal which is received for burning in this emissions unit. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each month, the representative samples of coal from all shipments of coal which were received during that month shall be combined into one composite sample. This combination may be a physical composite or a weighted average of the test data for the individual shipments.

Each monthly composite sample of coal shall be analyzed for sulfur content (percent) and heat content (Btu/pound of coal). The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the most recent version of the following ASTM methods: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865, Gross Calorific Value of Coal and Coke. Alternative, equivalent methods may be used upon written approval from the Hamilton County Department of Environmental Services.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(D))

- (3) The permittee shall maintain monthly records of the total quantity of coal burned, the results of the analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in pounds per mmBtu), for all shipments of coal during each calendar month. The sulfur dioxide emission rate is based upon a volume-weighted average as calculated per the equation in OAC rule 3745-18-04(F)(1).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(D))

- (4) The permittee shall maintain daily records of the total combined heat input, total combined hours of operation (calculated by the sum of the operating hours for each unit), and the daily average operating rate, in mmBtu per hour, for emissions units B010 and B020. To determine the heat input, the permittee shall continuously monitor and record the steam flow rate from this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(I))

- (5) The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of particulate emissions from the common stack serving B010 and B020. The opacity of the visible particulate emissions from B010 and B020 shall be monitored in the combined stack for the two boilers and the visible particulate emission limitation specified in b)(1)b. applies to each individual boiler as monitored at the common stack. An exceedance of the visible emissions limitation in b)(1)b. as measured at the common stack does not necessarily constitute an exceedance of the emissions limitation for both boilers. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.



The permittee shall maintain records of data obtained by the continuous opacity monitoring system including, but not limited to:

- a. percent opacity on an instantaneous (one-minute or less) and 6-minute block average basis;
- b. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- c. hours of operation of the emissions unit, continuous opacity monitoring system, and control equipment;
- d. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous opacity monitoring system;
- e. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous opacity monitoring system; as well as,
- f. the reason (if known) and the corrective actions taken (if any) for each such event in d. and e. above.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-03(B)(1)(b), 40 CFR Part 60.13, 40 CFR Part 60, Appendices B & F, and 40 CFR Part 64)

- (6) The permittee shall maintain on-site, the document of certification received from the U.S. EPA or the Ohio EPA's Central Office verifying that the continuous opacity monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter/document of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-17-03(B)(1)(b), 40 CFR Part 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 64)

- (7) To obtain an exemption pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain temperature monitors and recorders that measure and record the temperature of the boiler exhaust gases entering the ESPs during (a) all periods of start-up until the ESPs are operational or until the inlet temperatures of the ESPs achieve the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b) all periods of shutdown until the inlet temperatures of the ESPs drop below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i). An electronic or hardcopy record of the temperatures during periods of start-up and shutdown shall be maintained.

The temperature monitors and recorders shall be installed, calibrated, operated, and maintained in accordance with manufacturer's recommendations, with any modifications



deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in units of degrees Fahrenheit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A)(3))

- (8) The permittee shall maintain the following records for emissions units B010, B020, F003, P019, and all de minimus emissions units (i.e. cooling tower) associated with the Cogeneration Expansion Project, as described in the application for Permit to Install (PTI) #14-05962, submitted July 20, 2007, in order to demonstrate that the Cogeneration Expansion Project does not trigger major modification for PE, PM10/PM2.5, NOx, CO, and VOC:
 - a. the projected actual annual emissions for PE, PM10/PM2.5, NOx, CO, and VOC, in tons per year, from the Cogeneration Expansion Project; and
 - b. the total actual annual emissions of PE, PM10/PM2.5, NOx, CO, and VOC, in tons per year, from emission units B010, B020, F003, P019, and all de minimus emissions units (i.e. cooling tower) associated with the Cogeneration Expansion Project, combined, for the 5 calendar years after commencing operation of the Cogeneration Expansion Project.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-10(A))

- (9) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for particulate emissions, until the compliance date in 40 CFR Part 63, Subpart DDDDD, are the opacity of the visible particulate emissions from the electrostatic precipitator exhaust stack and the electrostatic precipitator power parameters (primary amperage and primary voltage) indicator ranges.

Stack opacity is measured and recorded by the certified continuous opacity monitoring (COM) system. The visible particulate emissions indicator range is each six-minute block average with an opacity value greater than 15%. When the opacity value is greater than 15% for two consecutive averaging periods, corrective action (including, but not limited to, an evaluation of the emissions unit and electrostatic precipitator) will be required.

The electrostatic precipitator may be evaluated by checking the power parameters (primary amperage and primary voltage) for the ESP's three fields to ensure that they are operating within the indicator ranges below. The ESP does not have displays or indicators for secondary power parameters. The electrostatic precipitator power parameter indicator ranges for normal operation are:

<u>Parameter</u>	<u>Range</u>
Primary Current	28 - 130 amps
Primary Voltage	140 - 283 volts

The indicator range noted above is effective for the duration of this permit, unless revisions are requested by the permittee and approved by Ohio EPA. The permittee may request revisions to the ranges above based upon information obtained during future emission tests that demonstrate compliance with the emission limitations for this emissions unit. In addition, approved revisions to the ranges will not constitute a



relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

- (10) When the opacity exceeds 15% for two consecutive six-minute averaging periods and one of the power parameters is outside of the indicator ranges above, corrective action focused on the ESP will be required. When opacity exceeds 15% for two consecutive six-minute averaging periods and the power parameters are within the indicator ranges above, corrective action focused on the emission unit will be required.

Upon detecting an excursion of the visible particulate emission value above 15% opacity for two consecutive six-minute averaging periods, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as thorough response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

- (11) Whenever the monitored values for the opacity and/or ESP parameters deviate from the indicator range specified in d)(9) in a manner as defined in d)(10), the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
 - a. the date and time the deviation began and ended;
 - b. the magnitude of the deviation;
 - c. the date(s) the investigation was conducted;
 - d. the names of the personnel who conducted the investigation; and
 - e. the findings and recommendations of the investigation.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

- (12) In response to each required investigation required in d)(11) to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the indicator range specified in d)(9). The permittee shall maintain records of the following information for each corrective action taken:
 - a. a description of the corrective action;
 - b. the date and time the corrective action was completed; and
 - c. the names of the personnel who performed the work.



Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

- (13) If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64)

- (14) The permit to install application for this emissions unit, B020, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit, i.e., "24" hours per day and "7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):



$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: hydrogen chloride

TLV (ug/m3): 7458

Maximum Hourly Emission Rate (lbs/hr): 36.41

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 17.6

MAGLC (ug/m3): 178

The permittee has demonstrated that emissions of hydrogen chloride from emissions unit B020 is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

(Authority for term: OAC rule 3745-77-07(C)(1), ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, and Option A, Engineering Guide #70)

- (15) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration”, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
- c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final permit to install prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in



greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(Authority for term: OAC rule 3745-77-07(C)(1), ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, and Option A, Engineering Guide #70)

- (16) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(Authority for term: OAC rule 3745-77-07(C)(1), ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, and Option A, Engineering Guide #70)

- (17) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

(Authority for term: OAC rule 3745-77-07(C)(1), ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, and Option A, Engineering Guide #70)

- (18) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-05962, issued on January 31, 2008: d)(1) through d)(17). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.



e) Reporting Requirements

- (1) The permittee shall submit quarterly reports on the quality and quantity of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
 - a. the total quantity of coal received (tons);
 - b. the average ash content (percent) of the coal received;
 - c. the average sulfur content (percent) of the coal received;
 - d. the average heat content (Btu/pound) of the coal received; and
 - e. the average sulfur dioxide emission rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received.

Compliance with the sulfur dioxide emission limit shall be determined each month by calculating the average monthly sulfur dioxide emission rate, using the results of the analyses of the monthly composite sample for sulfur content and heat content.

These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall cover the data obtained during the previous calendar quarters.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(D))

- (2) The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify each exceedance of the total combined operating rate limitation specified in c)(1).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1))

- (3) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, and Option A, Engineering Guide #70))

- (4) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous opacity monitoring system:
 - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and



the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, OAC rule 3745-17-07, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance.

- b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous opacity monitor;
 - iii. a description of any change in the equipment that comprises the continuous opacity monitoring system (COMS), including any change to the hardware, changes to the software that may affect COMS readings, and/or changes in the location of the COMS sample probe;
 - iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
 - v. the total operating time (hours) of the emissions unit;
 - vi. the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;
 - vii. the date, time, and duration of any/each malfunction** of the continuous opacity monitoring system, emissions unit, and/or control equipment;
 - viii. the date, time, and duration of any downtime** of the continuous opacity monitoring system and/or control equipment while the emissions unit was in operation; and
 - ix. the reason (if known) and the corrective actions taken (if any) for each event in vii. and viii. above.

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* where no exceedance of the opacity limit has occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the quarterly EER report

** each downtime and malfunction event shall be reported regardless if there is an exceedance of the opacity limit

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 60.7, and 40 CFR Part 64)



- (5) The permittee shall notify the Hamilton County Department of Environmental Services in writing if in any three calendar year period this unit sells to a utility power distribution system an annual average of more than one-third of its potential electrical output capacity and more than 219,000 MWe-hours actual electric output (on a gross basis). This notification shall identify the cause for the exceedance and the estimated gross sales in MWe-hours and as a percentage of potential electrical capacity. This notification shall be submitted to the Hamilton County Department of Environmental Services within 60 days after the end of such three calendar year period.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-103-02(B)(4)(b))

- (6) The permittee shall notify the Hamilton County Department of Environmental Services in writing if annual emissions from all emissions units in the Cogeneration Expansion Project, as specified in d)(8), result in a significant PE, PM10/PM2.5, NOx, CO, and/or VOC emissions increase and exceed the projected actual PE, PM10/PM2.5, NOx, CO, and VOC emissions contained in the application for PTI #14-05962, submitted July 20, 2007. This notification shall identify the cause for the significant emissions increase and the estimated PE, PM10/PM2.5, NOx, CO, or VOC emissions. This notification shall be submitted to the Hamilton County Department of Environmental Services within 60 days after the end of such year.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-10(A)(5))

- (7) The permittee shall submit quarterly deviation (excursion) reports that identify the following information concerning the operation of the ESP and visible emissions from this emissions unit(s):
- each period of time (start time and date, and end time and date) when the visible emissions and/or ESP operating parameters were outside of the range specified in d)(9) in a manner as defined in d)(10);
 - an identification of each incident of deviation described in e)(7)a. where a prompt investigation was not conducted;
 - an identification of each incident of deviation described in e)(7)a. where prompt corrective action, that would bring the emissions unit(s) into compliance and/or the ESP indicator ranges defined in d)(9) into an acceptable range, was determined to be necessary and was not taken; and
 - an identification of each incident of deviation described in e)(6)a. where proper records were not maintained for the investigation and/or the corrective action(s).

If no deviations/excursions occurred during a calendar quarter, the report shall so state that no deviations occurred during the reporting period.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[Authority for term: 40 CFR Part 64 CAM, and 3745-77-07(C)(1)]

- (8) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to



Install #14-05962, issued on January 31, 2008: e)(1) through e)(7). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Visible Particulate Emission Limitation:

As specified in b)(1)b.

Applicable Compliance Method:

Ongoing compliance with the opacity limitation contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60.

(Authority for term: OAC rule 3745-77-07(C)(1), 40 CFR 60.13, and 40 CFR Part 60, Appendices B & F)

b. Particulate Emission Limitations:

As specified in b)(1)a. and b)(1)c.

Applicable Compliance Method:

Compliance with the mass allowable emissions limitation in pound per mmBtu and the annual emission rate shall be demonstrated through the particulate emission testing required in f)(2) below.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(9))

c. Sulfur Dioxide Emission Limitations:

As specified in b)(1)a. and b)(1)d.

Applicable Compliance Method:

Compliance with the mass allowable emission limitation in pound per mmBtu and the annual emissions rate shall be determined by using the fuel analysis records required pursuant to d)(2) and d)(3) and the applicable equation in OAC rule 3745-18-04(F).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.



(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-18-04(D))

- d. Particulate matter 10 microns and less in diameter (PM10) and particulate matter 2.5 microns and less in diameter (PM2.5) Emission Limitations:

As specified in b)(1)a.

Applicable Compliance Method:

The emission limitations specified above are based upon the emission unit's potential to emit. Compliance shall be determined by emission factors found in US EPA AP-42 Section 1.1 (dated 9/98) or the permittee's most recent emissions test data.

If required, the permittee shall demonstrate compliance with the PM10/PM2.5 emission limitation through emission tests performed in accordance with 40 CFR Part 51, Appendix M, Methods 1 through 4 and 201.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- e. Nitrogen Oxides (NOx) Emission Limitations:

As specified in b)(1)a.

Applicable Compliance Method:

The emission limitations specified above are based upon the emission unit's potential to emit. Compliance shall be determined by emission factors found in US EPA AP-42 Section 1.1 (dated 9/98) or the permittee's most recent emissions test data.

If required, the permittee shall demonstrate compliance with the NOx emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- f. Carbon Monoxide (CO) Emission Limitations:

As specified in b)(1)a.

Applicable Compliance Method:

The emission limitations specified above are based upon the emission unit's potential to emit. Compliance shall be determined by emission factors found in US EPA AP-42 Section 1.1 (dated 9/98) or the permittee's most recent emissions test data.

If required, the permittee shall demonstrate compliance with the CO emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))



g. Non-methane Organic Compound (NMOC) Emission Limitations:

As specified in b)(1)a.

Applicable Compliance Method:

The emission limitations specified above are based upon the emission unit's potential to emit. Compliance shall be determined by emission factors found in US EPA AP-42 Section 1.1 (dated 9/98) or the permittee's most recent emissions test data.

If required, the permittee shall demonstrate compliance with the non-methane organic compounds emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

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

- a. the emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit renewal;
- b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates;
- c. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9);
- d. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity;
- e. not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s);
- f. personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment; and
- g. a comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the



submission of the written report. The request may be granted, where warranted, if submitted prior to testing and with prior approval from the Hamilton County Department of Environmental Services.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(9))

- (3) Acid Rain Program exemption thresholds as defined in b)(2)b.

Compliance shall be determined by the information collected and recorded in d)(1).

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-103-02(B)(4)(b))

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-05962, issued on January 31, 2008: f)(1)-f)(3). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) The Cogeneration Expansion Project approved under PTI #14-05962, issued January 31, 2008, resulted in debottlenecking and/or utilization increases of several existing emissions units at the facility. The projected SO2 actual emissions increases from the existing coal-fired boilers, emissions units B010 and B020, as described in the application for PTI #14-05962, submitted on July 20, 2007, triggered the definition of significant increase and significant net emission increase as defined in OAC rule 3745-31-01(III); therefore, emissions units B010 and B020 were subject to PSD review under New Source Review (NSR) major modification requirements.

The permittee provided a PSD Assessment and Modeling Analysis for the existing coal-fired boilers with the application for PTI #14-05962, submitted on July 20, 2007, and revised on September 26, 2007. The SO2 emission increases from the boilers did not exceed the existing allowable emission limitations which demonstrated compliance with the PSD requirements, OAC rules 3745-31-10 through 3745-31-20.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rules 3745-31-10 through 3745-31-20)



3. F003, Coal and Ash Handling CH11001

Operations, Property and/or Equipment Description:

Coal and ash handling and unloading

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Coal unloading (railcar bottom dumping and truck dumping)		
a.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any fugitive dust emission point shall not exceed 20% opacity, as a 3-minute average.
b.	OAC rule 3745-17-08(B)	Dumping shall be accomplished at a slow rate and in a partially enclosed area to minimize or eliminate visible emissions of fugitive dust.
Ash loading and unloading		
c.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any fugitive dust emission point shall not exceed 20% opacity, as a 3-minute average.
d.	OAC rule 3745-17-08(B)	The permittee shall employ reasonable available control measures (RACM) to minimize or eliminate visible particulate emissions from the ash truck loading operations. Such measures may include, but are not limited to: conditioning the ash with water and/or other dust suppressant materials, application of dust collection and control equipment, or other appropriate control methods.
Coal and ash transfer and conveying		
e.	OAC rule 3745-17-07(B)(1)	Visible particulate emissions from any fugitive dust emission point shall not



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed 20% opacity, as a 3-minute average.
f.	OAC rule 3745-17-08(B)	The conveyors and transfer points shall be maintained under roof to minimize or eliminate visible emissions of fugitive dust.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the location and color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item d. above or continue the emissions check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions. Visible emissions are not necessarily an indication of an emissions violation.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(B)(1))



e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that identify:

- a. all days during which abnormal visible fugitive particulate emissions were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible fugitive particulate emissions.

These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(B)(1))

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Visible Particulate Emission Limitations:

As specified in b)(1)a., b)(1)c., and b)(1)e.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(3).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(B)(1))

g) Miscellaneous Requirements

(1) None.



4. K004, No. 2 Paper Machine Rod Coater CH12052

Operations, Property and/or Equipment Description:

No. 2 Paper Machine Coater System (EU K004 includes only the on-machine rod coater on the No. 2 Paper Machine. Other papermaking processes on the No. 2 Paper Machine are permitted separately under emissions unit P012.)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI 14-04176)	<p>Volatile organic compound (VOC) emissions shall not exceed 211 pounds per hour.*</p> <p>VOC emissions shall not exceed 16.25 tons per year (TPY) as a rolling 12-month summation of the monthly emissions.</p> <p>See c)(1).</p> <p>*The hourly emission limitation outlined above is based on the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(F).</p>
b.	OAC rule 3745-21-09(F)	The VOC content of the coatings employed shall not exceed 2.9 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.

(2) Additional Terms and Conditions

a. None.



c) Operational Restrictions

- (1) The maximum annual VOC input, as applied, of coatings employed in this emissions unit shall not exceed 16.25 tons per year as a rolling 12-month summation. The VOC input shall be determined by multiplying the number of gallons of coating employed per month by the VOC content of each coating in pounds per gallon, excluding water and exempt solvents [see record keeping requirements specified in d)(1) and d)(2)].

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, in pounds of VOC per gallon, excluding water and exempt solvents, as applied;
 - c. the water and exempt solvent content of each coating, as applied, in percent by weight;
 - d. the amount of each coating employed, in gallons, excluding water and exempt solvents;
 - e. the monthly VOC emissions/VOC Input (the summation of the VOC content recorded in d)(1)b multiplied by the usage recorded in d)(1)d. for each coating employed); and,
 - f. the updated rolling, 12-month VOC emission total/VOC Input, in tons(the current monthly VOC emission total recorded in d)(1)e. added to the previous 11-months VOC emission totals recorded in d)(1)e..

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(B)(3)(f), and OAC rule 3745-31-05(A)(3))

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-04176, issued on July 7, 2005: d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the following:
 - a. an identification of all exceedances of the rolling 12-month VOC input operational restriction as specified in c)(1); and



- b. an identification of all exceedances of the rolling 12-month emission limitation for VOC as specified in b)(1)a.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- (2) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings (i.e., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(g))

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-04176, issued on July 7, 2005: e)(1) and e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. VOC Hourly Emission Limitation:

As specified in b)(1)a.

Applicable Compliance Method:

The hourly emission limitation is based on the emissions unit's potential to emit and the operational parameters as provided in the PTI application 14-04176, submitted May 29, 1996. This emission limitation was established by multiplying the maximum coating application rate (72.74 gallons per hour) by 2.9 pounds of VOC per gallon.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- b. VOC Annual Emission Limitation:

As specified in b)(1)a.

Applicable Compliance Method:



Compliance with the VOC annual emission limitation shall be determined by the record keeping requirements specified in d)(1).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. VOC Content Limitation:

As specified in b)(1)b.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(F), and OAC rule 3745-21-10(B))

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-04176, issued on July 7, 2005: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

(Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(F)(3)(c) and F(4))



5. K005, No. 3 Paper Machine Rod Coater CH12053

Operations, Property and/or Equipment Description:

No. 3 Paper Machine Coater System (EU K005 includes only the on-machine rod coater on the No. 3 Paper Machine. Other papermaking processes on the No. 3 Paper Machine are permitted separately under emissions unit P013.)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Nonattainment New Source Review and the Emissions Offset Policy	VOC emissions shall not exceed 16.25 tons per year (TPY) as a rolling 12-month summation of the monthly emissions. See c)(1).
b.	OAC rule 3745-31-05(A)(3) (PTI 14-04409)	<p>Volatile organic compound (VOC) emissions shall not exceed 211 pounds per hour.*</p> <p>*The hourly emission limitation outlined above is based on the emissions unit's potential to emit. Therefore, no hourly records are required to demonstrate compliance with this limitation.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-09(F) and OAC rule 3745-31-05(D).</p>
c.	OAC rule 3745-21-09(F)	The VOC content of the coatings employed shall not exceed 2.9 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.

(2) Additional Terms and Conditions

a. None.



c) Operational Restrictions

- (1) The maximum annual VOC input, as applied, of coatings employed in this emissions unit shall not exceed 16.25 tons per year as a rolling 12-month summation. The VOC input shall be determined by multiplying the number of gallons of coating employed per month by the VOC content of each coating in pounds per gallon, excluding water and exempt solvents [see record keeping requirements specified in d)(1) and d)(2)].

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(D))

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification number of each coating, as applied;
 - b. the VOC content of each coating, in pounds of VOC per gallon, excluding water and exempt solvents, as applied;
 - c. the water and exempt solvent content of each coating, as applied, in percent by weight;
 - d. the amount of each coating employed, in gallons, excluding water and exempt solvents;
 - e. the monthly VOC emissions/VOC Input (the summation of the VOC content recorded in d)(1)b multiplied by the usage recorded in d)(1)d. for each coating employed); and,
 - f. the updated rolling, 12-month VOC emission total/VOC Input, in tons(the current monthly VOC emission total recorded in d)(1)e. added to the previous 11-months VOC emission totals recorded in d)(1)e..

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(B)(3)(f), OAC rule 3745-31-05(D), and OAC rule 3745-31-05(A)(3))

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-04409, issued on July 13, 2006: d)(1). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the following:
 - a. an identification of all exceedances of the rolling 12-month VOC input operational restriction as specified in c)(1); and



- b. an identification of all exceedances of the rolling 12-month emission limitation for VOC as specified in b)(1)c.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D))

- (2) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings (i.e., VOC contents). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(g))

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-04409, issued on July 13, 2006: e)(1) and e)(2). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. VOC Hourly Emission Limitation:

As specified in b)(1)a.

Applicable Compliance Method:

The hourly emission limitation is based on the emissions unit's potential to emit and the operational parameters as provided in the PTI application 14-04409, submitted May 24, 1996. This emission limitation was established by multiplying the maximum coating application rate (72.74 gallons per hour) by 2.9 pounds of VOC per gallon.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- b. VOC Annual Emission Limitation:

As specified in b)(1)c.

Applicable Compliance Method:



Compliance with the VOC annual emission limitation shall be determined by the record keeping requirements specified in d)(1).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D))

c. VOC Content Limitation:

As specified in b)(1)b.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(F), and OAC rule 3745-21-10(B))

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-04409, issued on July 13, 2006: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

(Authority for term: OAC rule 3745-77-07(C)(1) and ORC 3704.03(F)(3)(c) and F(4))



6. K006, No. 9 Paper Machine Coater CH12054

Operations, Property and/or Equipment Description:

No. 9 Paper Machine Coater System (EU K006 includes only the on-machine rod coater on the No. 9 Paper Machine. Other papermaking processes on the No. 9 Paper Machine are permitted separately under emissions unit P014.)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(F)	The VOC content of the coatings employed shall not exceed 2.9 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each coating, as applied; and

b. the VOC content of each coating (excluding water and exempt solvents), as applied.

The information above shall be collected and recorded as part of the common coating kitchen records for the facility.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new source and subject to a specific "gallons/year" limitation in a Permit to Install. In such cases, for each such new source only, the above-mentioned information



must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(f))

e) Reporting Requirements

- (1) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings as specified in OAC rule 3745-21-09(F). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(g))

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. VOC Content Limitation:

As specified in b)(1)a.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(F), and OAC rule 3745-21-10(B))

g) Miscellaneous Requirements

- (1) None.



7. K007, No. 10 Paper Machine Coater CH12055

Operations, Property and/or Equipment Description:

No. 10 Paper Machine Coater System (EU K007 includes only the on-machine rod coater on the No. 10 Paper Machine. Other papermaking processes on the No. 10 Paper Machine are permitted separately under emissions unit P015.)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(F)	The VOC content of the coatings employed shall not exceed 2.9 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information each month for this emissions unit:

a. the name and identification number of each coating, as applied; and

b. the VOC content of each coating (excluding water and exempt solvents), as applied.

The information above shall be collected and recorded as part of the common coating kitchen records for the facility.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new source and subject to a specific "gallons/year" limitation in a Permit to Install. In such cases, for each such new source only, the above-mentioned information



must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(f))

e) Reporting Requirements

- (1) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings as specified in OAC rule 3745-21-09(F). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(g))

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. VOC Content Limitation:

As specified in b)(1)a.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(1). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(F), and OAC rule 3745-21-10(B))

g) Miscellaneous Requirements

- (1) None.



8. P009, No. 2 Mill Tubsize Starch Mix and Cookers CH12013

Operations, Property and/or Equipment Description:

No. 2 Mill Tubsize Starch Mix Tank and Tubsize Starch Cookers, Controlled with a Wet Venturi Scrubber

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
b.	OAC rule 3745-17-11(B)(1) (Figure II)	Particulate emissions (PE) shall not exceed 5.18 pounds per hour.

(2) Additional Terms and Conditions

a. The emissions from this emissions unit shall be vented to a wet scrubber at all times the emissions unit is in operation.

(Authority for term: OAC rule 3745-77-07(C)(1))

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range or limit for the pressure drop across the scrubber and the scrubber liquid flow rate shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range for each parameter is established to demonstrate compliance.

(Authority for term: OAC rule 3745-77-07(C)(1))

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop across the scrubber (in pounds per square inch, gauge) and



the scrubber liquid flow rate (in gallons per minute) during operation of this emissions unit, including periods of startup and shutdown. The permittee shall record the pressure drop across the scrubber and the scrubber liquid's flow rate on a weekly basis.

The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable range or limit for the pressure drop across the scrubber and the scrubber liquid flow rate shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range for each parameter is established to demonstrate compliance.

- (3) Whenever the monitored value for any parameter deviates from the range(s) or minimum limit(s) established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:
- a. the date and time the deviation began;
 - b. the magnitude of the deviation at that time;
 - c. the date the investigation was conducted;
 - d. the name(s) of the personnel who conducted the investigation; and
 - e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the control equipment parameters within the acceptable range(s), or at or above the minimum limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date the corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the pressure drop and flow rate readings immediately after the corrective action was implemented; and
- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.



These range(s) and/or limit(s) for the pressure drop and liquid flow rate are effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted range or limit for the pressure drop or liquid flow rate based upon information obtained during future performance tests that demonstrate compliance with the allowable particulate emission rate for this/these emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

(Authority for term: OAC rule 3745-77-07(C)(1))

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the following:

- a. each period of time (start time and date, and end time and date) when the pressure drop across the scrubber and/or the liquid flow rate was outside of the appropriate range or limit specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;
- b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the scrubber;
- c. each incident of deviation described in “a” or “b” (above) where a prompt investigation was not conducted;
- d. each incident of deviation described in “a” or “b” where prompt corrective action, that would bring the pressure drop and/or liquid flow rate into compliance with the acceptable range, was determined to be necessary and was not taken; and
- e. each incident of deviation described in “a” or “b” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-15-03(B)(1)(a) and OAC rule 3745-15-03(C); and OAC rule 3745-77-07(C)(1))

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Visible Particulate Emission Limitation:

As specified in b)(1)a.

Applicable Compliance Method:



If required, compliance shall be determined through visible emission 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). The presence of water vapor in the scrubber plume does not constitute visible emissions.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A))

b. Particulate Emission Limitation:

As specified in b)(1)b.

Applicable Compliance Method:

Due to the configuration of the exhaust system and the short duration intermittent batch operation of this emissions unit, it is not technically feasible to perform stack testing on this emissions unit. Compliance with the emission limitation specified above may be demonstrated by multiplying the US EPA AP-42 Table 11.17-4 uncontrolled particulate emissions factor of 2.2 pounds of particulate emissions per ton of raw material (starch) by the maximum hourly starch mixture processing rate of 11.78 tons per hour, then multiplying the uncontrolled mass emission rate by (1.00 - 0.95), or 0.05, based on the scrubber manufacturer's estimated control efficiency of 95 percent.

(Authority for term: OAC rule 3745-77-07(C)(1))

g) Miscellaneous Requirements

(1) None.



9. P010, No. 1 Mill Trim System CH19025

Operations, Property and/or Equipment Description:

No. 1 Mill Trim System, comprised of trim handling equipment including the trim conveyance system, trim recovery units (cyclones, airscreens, and broke boxes), and emissions control equipment.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) Synthetic Minor to Avoid Major Modification New Source review	Particulate emissions (PE) and particulate matter 10 microns and less in diameter (PM10) shall not exceed 10.65 tons per year (TPY), as a rolling 12-month summation. See c)(1).
b.	OAC rule 3745-31-05(A)(3) (PTI 14-04395)	Particulate emissions (PE) and particulate matter 10 microns and less in diameter (PM10) shall not exceed 25.84 pounds per hour. See c)(2). The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-07(B), OAC rule 3745-17-08(B), and OAC rule 3745-31-05(D).
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a 6-minute average, except as specified by rule.
d.	OAC rule 3745-17-07(B)(1)	Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.
e.	OAC rule 3745-17-08(B)	See b)(2)a.
f.	OAC rule 3745-17-11(B)(1)	The emission limitation specified by this



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	(Table I)	rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The permittee shall employ reasonably available control methods, including use of a fabric filter on the airscreen and use of a recovery cyclone system, for the purpose of ensuring compliance with the above-mentioned applicable requirements. The fabric filter and trim cyclone systems shall be sufficient to minimize or eliminate visible emissions of fugitive dust.

(Authority for term: OAC rule 3745-17-08(B) and OAC rule 3745-31-05(A)(3))

c) Operational Restrictions

- (1) The maximum annual production rate of trim for this emissions unit shall not exceed 12,604 tons for the combined trim cyclones and air screen system (baghouse), based upon a rolling, 12-month summation of the production rates.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(D))

- (2) The maximum hourly amount of trim produced from the trim cyclones and air screen system (baghouse) shall not exceed 31,207 pounds (or 15.6 tons) of trim per hour.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for this emissions unit:

- a. the total amount of trim produced from the air screen (baghouse) and the cyclone system, in pounds or tons per day;
- b. the total number of hours the air screen unit was in operation; and
- c. the average hourly amount of trim produced from the air screen (baghouse) and the cyclone system, i.e., a./b., in pounds or tons per hour.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- (2) The permittee shall collect and record the following information on a monthly basis:

- a. the total combined amount of trim produced from the air screen (baghouse) system and the cyclone system, in pounds or tons; and
- b. the updated rolling 12-month summation of the amount of trim produced from the air screen (baghouse) system and the cyclone system combined, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.



(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D))

- (3) The permittee shall properly install, operate and maintain equipment to monitor the fabric filter for broken or leaking fabric while the emissions unit is in operation. The monitoring equipment shall be installed, calibrated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s).

The permittee shall record any monitoring instrument responses of seventy percent of the instrument span or greater and any observed fabric breaks and/or leaks in the fabric filter. The permittee shall record the date, time, reason and corrective action(s) taken for each time period of emission unit and control equipment malfunctions and/or monitoring instrument response greater than or equal to seventy percent of the instrument span. The total down time of the monitoring instrument while the airscreen unit was on line shall also be included in the recordkeeping.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

- (4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-04395, issued on February 8, 2001: d)(1) through d)(3). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the following:
 - a. the rolling, 12-month trim production limitation for the combined trim cyclones and air screen system;
 - b. the seventy percent instrument span limitation in d)(3) or any observed bag breaks or leaks; and
 - c. the hourly trim production limitation in c)(2).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3), and OAC rule 3745-31-05(D))

- (2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-04395, issued on February 8, 2001: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.



f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Visible Particulate Emission Limitations:

As specified in b)(1)c and b)(1)d.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission 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).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A))

b. PE and PM10 Hourly Emission Limitations:

As specified in b)(1)b.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly amount of trim produced, as recorded in d)(1), by the permittee-supplied emission factor of 1.69 lbs of PE/PM10 per ton of trim produced, and dividing by 1 ton/2000 lbs. This emission factor is based on worst case source testing conducted from February 23-27, 1998 as found in the PTI modification application 14-04395 received September 29, 1999 for this emissions unit.

Should additional testing be required to demonstrate compliance with the PE and PM10 emission limits, Method 5 of 40 CFR Part 60, Appendix A, shall be used for PE, and Method 201 or 201A for PM10 emissions.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

c. PE and PM10 Annual Emission Limitations:

As specified in b)(1)a.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the total 12-month summation of trim produced, as recorded in d)(2), by the emission factor of 1.69 lbs of PE/PM10 per ton of trim produced, and dividing by 1 ton/2000 lbs. This emission factor is based on worst case source testing conducted from February 23-27, 1998 as found in the PTI modification application 14-04395 received September 29, 1999 for this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(D))

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Proposed Title V Permit

Permit Number: P0105122

Facility ID: 1409040212

Effective Date: To be entered upon final issuance

#14-04395, issued on February 8, 2001: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.



10. P016, No. 2 Mill Trim System CH12014

Operations, Property and/or Equipment Description:

No. 2 Mill Trim System, comprised of trim handling equipment including the trim conveyance system, and trim recovery units (cyclones, airscreens, broke boxes)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
b.	OAC rule 3745-17-11(B)(1) (Table I)	<p>Particulate emissions (PE) shall not exceed 6.7 pounds per hour.*</p> <p>See c)(1).</p> <p>*The emission limitation outlined above is greater than the emissions unit's potential to emit. Therefore, no hourly record keeping is required to demonstrate compliance with this limitation.</p> <p>The uncontrolled mass rate of emissions is less than 10 pounds per hour; therefore, Figure II of OAC rule 3745-17-11(B)(1) is not applicable.</p>

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The particulate emission limitation established pursuant to OAC rule 3745-17-11(B)(1), Table I, is based on the emissions unit's maximum process weight rate of 2.08 tons of paper scrap per hour.



(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(B)(1))

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Visible Particulate Emission Limitation:

As specified in b)(1)a.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission 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).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A))

b. Particulate Emission Limitation:

As specified in b)(1)b.

Applicable Compliance Method:

The emission limitation specified above is greater than the emission unit's potential to emit. Compliance with the emissions limitation specified above may be demonstrated by multiplying the permittee-supplied particulate emissions factor of 1.69 pounds of particulate emissions per ton of paper trim by the maximum hourly paper trim processing rate of 2.08 tons per hour. The permittee-supplied emission factor is based on manufacturer test data from similar emissions unit P010 as found in PTI modification application 14-04395 received September 29, 1999.

If required, the permittee shall demonstrate with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

(Authority for term: OAC rule 3745-77-07(C)(1))

g) Miscellaneous Requirements

(1) None.



11. P017, Super Calender Complex Trim Air Separator CH19024

Operations, Property and/or Equipment Description:

Super Calender Complex Trim Air Separator, including trim conveyance system and trim recovery units (cyclone, aircscreens, broke boxes).

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
b.	OAC rule 3745-17-11(B)(1) (Table I)	<p>Particulate emissions (PE) shall not exceed 3.26 pounds per hour.*</p> <p>See c)(1).</p> <p>*The emission limitation outlined above is greater than the emissions unit's potential to emit (PTE). Therefore, no hourly record keeping is required to demonstrate compliance with this limitation.</p> <p>The uncontrolled mass rate of emissions is less than 10 pounds per hour; therefore, Figure II of OAC rule 3745-17-11(B)(1) is not applicable.</p>

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The particulate emission limitation established pursuant to OAC rule 3745-17-11(B)(1), Table I, is based on the emissions unit's maximum process weight rate of 0.71 tons of paper scrap per hour.



(Authority for term : OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(B)(1))

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Visible Particulate Emission Limitation:

As specified in b)(1)a.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission 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).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A))

b. Particulate Emission Limitation:

As specified in b)(1)b.

Applicable Compliance Method:

The emission limitation specified above is greater than the emissions unit's potential to emit. Compliance with the emissions limitation specified above may be demonstrated by multiplying the permittee-supplied particulate emission factor of 1.69 pounds of particulate emissions per ton of paper trim by the maximum hourly paper trim processing rate of 0.71 tons per hour. The permittee-supplied emission factor is based on manufacturer test data from similar emissions unit P010 (adjusted for single cyclone) as found in PTI modification application 14-04395 received September 29, 1999.

If required, the permittee shall demonstrate with this emissions limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

(Authority for term: OAC rule 3745-77-07(C)(1))

g) Miscellaneous Requirements

(1) None.



12. P018, Coating Preparation CH12017

Operations, Property and/or Equipment Description:

Coating Preparation

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-07(G)(2)	Exempt. See b)(2)a., b)(2)b., and c)(1).

(2) Additional Terms and Conditions

a. This emissions unit does not employ, apply, evaporate or dry any photochemically reactive material (PRM), or any substance containing such PRM. Therefore, there are no applicable emission limitations from OAC rule 3745-21-07(G)(2).

b. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: c)(1), d)(1), and e)(1).

c) Operational Restrictions

(1) The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

(1) For each day a photochemically reactive material is employed, the permittee shall maintain a record of the type and quantity of such materials employed in this emissions unit.



(Authority for term: OAC rule 3745-77-07(C)(1))

e) Reporting Requirements

- (1) The permittee shall submit deviation reports that identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Hamilton County Department of Environmental Services within 30 days of the deviation.

(Authority for term: OAC rule 3745-77-07(C)(1))

f) Testing Requirements

- (1) None.

g) Miscellaneous Requirements

- (1) None.



13. P019, Ash Silo CH11006

Operations, Property and/or Equipment Description:

Ash Silo, loading and unloading controlled by a fabric filter baghouse

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
b.	OAC rule 3745-17-11(B)(1) (Table I)	<p>Particulate emissions (PE) shall not exceed 6.76 pounds per hour.*</p> <p>See c)(1).</p> <p>*The emission limitation outlined above is greater than the emissions unit's potential to emit. Therefore, no hourly record keeping is required to demonstrate compliance with this limitation.</p> <p>The uncontrolled mass rate of emissions is less than 10 pounds per hour; therefore, Figure II of OAC rule 3745-17-11(B)(1) is not applicable.</p>

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The particulate emission limitation established pursuant to OAC rule 3745-17-11(B)(1), Table I, is based on the emissions unit's maximum process weight rate of 2.11 tons of ash per hour.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-17-11(B)(1))



d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Visible Particulate Emission Limitation:

As specified in b)(1)a.

Applicable Compliance Method:

If required, compliance shall be determined through visible emission 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).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-07(A))

b. Particulate Emission Limitation:

As specified in b)(1)b.

Applicable Compliance Method:

The emission limitation specified above is greater than the emissions unit's potential to emit. Compliance with the emission limitation specified above may be demonstrated by multiplying the US EPA AP-42 Table 11.17-4 uncontrolled particulate emissions factor of 2.2 pounds of particulate emissions per ton of material (ash) by the maximum hourly process rate of 2.11 tons ash per hour, then multiplying the uncontrolled mass emissions rate by (1.00 - 0.98), or 0.02, based on the baghouse manufacturer's estimated control efficiency of 98 percent.

If required, the permittee shall demonstrate with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

(Authority for term: OAC rule 3745-77-07(C)(1))

g) Miscellaneous Requirements

(1) None.



14. Emissions Unit Group - Cast Coaters: K001, K002, K003, K008, K009, K010, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, K026

EU ID	Operations, Property and/or Equipment Description
K001	No. 33 Cast Coater
K002	No. 44 Cast Coater
K003	No. 55 Cast Coater
K008	No.3 Cast Coater
K009	No. 4 Cast Coater
K010	No. 5 Cast Coater
K011	No. 6 Cast Coater
K012	No. 7 Cast Coater
K013	No. 8 Cast Coater
K014	No. 9 Cast Coater
K015	No. 10 Cast Coater
K016	No. 11 Cast Coater
K017	No. 12 Cast Coater
K018	No. 13 Cast Coater
K019	No. 14 Cast Coater
K020	No. 15 Cast Coater
K021	No. 22 Cast Coater
K022	No. 17 Cast Coater
K023	No. 77 Cast Coater
K024	No. 88 Cast Coater
K025	No. 99 Cast Coater
K026	No. 1 Cast Coater

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-09(F)	The VOC content of the coatings employed shall not exceed 2.9 pounds of VOC per gallon of coating, as applied, excluding water and exempt solvents.
b.	40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280 – 63.3420)	See b)(2)a.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[In accordance with 40 CFR 63.3300, these emission units are web coating lines at an existing papermaking facility that is a major source of HAP subject to the emissions limitations/control measures specified in this section.]	
c.	40 CFR 63.1-15	Table 2 to 40 CFR Part 63, Subpart JJJJ - Applicability of 40 CFR Part 63 General Provisions to Subpart JJJJ, shows which parts of the General Provisions in 40 CFR 63.1-15 apply.

(2) Additional Terms and Conditions

- a. The emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from the collection of all web coating lines at this facility, including emissions units K001 (No. 33 Cast Coater), K002 (No. 44 Cast Coater), K003 (No. 55 Cast Coater), K008 (No. 3 Cast Coater), K009 (No. 4 Cast Coater), K010 (No. 5 Cast Coater), K011 (No. 6 Cast Coater), K012 (No. 7 Cast Coater), K013 (No. 8 Cast Coater), K014 (No. 9 Cast Coater), K015 (No. 10 Cast Coater), K016 (No. 11 Cast Coater), K017 (No. 12 Cast Coater), K018 (No. 13 Cast Coater), K019 (No. 14 Cast Coater), K020 (No. 15 Cast Coater), K021 (No. 22 Cast Coater), K022 (No. 17 Cast Coater), K023 (No. 77 Cast Coater), K024 (No. 88 Cast Coater), K025 (No. 99 Cast Coater), and K026 (No. 1 Cast Coater), shall not exceed 0.2 kilogram organic HAP per kilogram coating solids as-applied on a monthly average basis.

(Authority for term: 40 CFR Part 63.3320(a), 40 CFR Part 63.3320(b)(3), 40 CFR Part 63.3370(a)(2)(iv))

c) Operational Restrictions

- (1) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 63, Subpart JJJJ, including the following: d)(3).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ)

- (2) The permittee shall collect and record the following information each month for this emissions unit:

- a. the name and identification number of each coating, as applied; and



- b. the VOC content of each coating (excluding water and exempt solvents), as applied.

The information above shall be collected and recorded as part of the common coating kitchen records for the facility.

(This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new source and subject to a specific "gallons/year" limitation in a Permit to Install. In such cases, for each such new source only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.)

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(f))

- (3) The permittee shall collect and record the following information each month for emissions units K001, K002, K003, K008, K009, K010, K011, K012, K013, K014, K015, K016, K017, K018, K019, K020, K021, K022, K023, K024, K025, and K026, combined:

- a. the organic HAP content of each coating as-applied determined pursuant to 40 CFR Part 63.3360(c), expressed as a mass fraction, kg/kg;
- b. the coating solids content of each coating as-applied determined pursuant to 40 CFR Part 63.3360(d), expressed as a mass fraction, kg/kg;
- c. the mass of each coating as-applied in a month, in kg; and,
- d. the calculated monthly average organic HAP content of all as-applied coating materials pursuant to Equation 5 of 40 CFR Part 63.3370(c)(4).

(Authority for term: 40 CFR Part 63.3410(a)(1) and 40 CFR Part 63.3370(c)(4))

e) Reporting Requirements

- (1) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 63, Subpart JJJJ, including the following: e)(3) and e)(4).

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ)

- (2) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings as specified in OAC rule 3745-21-09(F). The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-21-09(B)(3)(g))

- (3) The permittee shall submit a Notification of Compliance Status for 40 CFR Part 63, Subpart JJJJ, as specified in 40 CFR Part 63.9(h).

(Authority for term: 40 CFR Part 63.3400(e) and 40 CFR 63, Subpart A)

- (4) The permittee shall submit semi-annual compliance reports in accordance with 40 CFR Part 63.3400(c) by January 31 and July 31 of each year covering the previous six



calendar months of operation. The semi-annual compliance reports shall contain the following information as specified in 40 CFR Part 63.3400(c)(2):

- a. company name and address;
- b. statement by a responsible official with the official's name, title, and signature certifying the accuracy of the content of the report;
- c. the date of the report and beginning and ending dates of the reporting period;
- d. if there are no deviations from the organic HAP emission limitations as specified in b)(2)a., a statement that there were no deviations from the emissions limitations during the reporting period; and,
- e. if there were any deviations from the organic HAP emission limitations as specified in b)(2)a. during the reporting period, the report shall include the following information:
 - i. the total operating time of each affected source during the reporting period; and,
 - ii. information on the number, duration, and cause of the deviations (including unknown cause), if applicable, and the corrective action taken.

In addition to the above, the semi-annual compliance report shall include additional information if the following changes occur at the facility: 1) a change occurs at the facility or within the process that might affect its compliance status; 2) a change from what was reported in the Initial Notification of Compliance Status occurs at the facility or within the process; or 3) a change to another emission limitation option under 40 CFR Part 63, Subpart JJJJ.

(Authority for term: 40 CFR Part 63.3400(c) and 40 CFR Part 63, Subpart A)

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. VOC Content Limitation:

As specified in b)(1)a.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in d)(2). USEPA Methods 24 and 24A shall be used to determine the VOC contents for coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24 or 24A.



(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-21-09(F), and OAC rule 3745-21-10(B))

b. Organic HAP Emissions Limitation:

As specified in b)(2)a.

Applicable Compliance Method:

Compliance with the applicable organic HAP emission limitation shall be demonstrated by the record keeping requirements in d)(3).

(Authority for term: 40 CFR Part 63.3370(a)(2)(iv))

- (2) The permittee shall comply with the applicable compliance procedures and performance test methods as required under 40 CFR Part 63, Subpart JJJJ, including the above: f)(1)b.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 63, Subpart JJJJ)

g) Miscellaneous Requirements

- (1) None.



15. Emissions Unit Group - Paper Machines Stock Prep: P012, P013, P014, P015

EU ID	Operations, Property and/or Equipment Description
P012	No. 2 Paper Machine (EU P012 consists of the papermaking processes on the No. 2 Paper Machine, including stock preparation and wet end substrate formation. The on-machine rod coater on the No. 2 Paper Machine is permitted separately under emissions unit K004.)
P013	No. 3 Paper Machine (EU P013 consists of the papermaking processes on the No. 3 Paper Machine, including stock preparation and wet end substrate formation. The on-machine rod coater on the No. 3 Paper Machine is permitted separately under emissions unit K005.)
P014	No. 9 Paper Machine (EU P014 consists of the papermaking processes on the No. 9 Paper Machine, including stock preparation and wet end substrate formation. The on-machine rod coater on the No. 9 Paper Machine is permitted separately under emissions unit K006.)
P015	No. 10 Paper Machine (EU P015 consists of the papermaking processes on the No. 10 Paper Machine, including stock preparation and wet end substrate formation. The on-machine rod coater on the No. 10 Paper Machine is permitted separately under emissions unit K007.)

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-07(G)(2)	Exempt. See b)(2)a., b)(2)b., and c)(1).

(2) Additional Terms and Conditions

a. This emissions unit does not employ, apply, evaporate or dry any photochemically reactive material (PRM), or any substance containing such PRM. Therefore, there are no applicable emission limitations from OAC rule 3745-21-07(G)(2).

b. On February 18, 2008, OAC rule 3745-21-07 was revised in its entirety; therefore, the 21-07 rule that was in effect prior to this date is no longer part of the State regulations. On April 4, 2008, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-07, the requirement to comply with the previous 21-07 rule provisions still exists as part of the federally-approved SIP for Ohio. The following terms and conditions shall become void after U.S. EPA approves the rule revision: c)(1), d)(1), and e)(1).



c) Operational Restrictions

- (1) The permittee shall not employ any photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1))

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day a photochemically reactive material is employed, the permittee shall maintain a record of the type and quantity of such materials employed in this emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1))

e) Reporting Requirements

- (1) The permittee shall submit deviation reports that identify the days during which photochemically reactive materials were employed in this emissions unit. Each report shall identify the cause for the use of the photochemically reactive material(s), and the estimated total quantity of material(s) emitted during each such day, in pounds. Each report shall be submitted to the Hamilton County Department of Environmental Services within 30 days of the deviation.

(Authority for term: OAC rule 3745-77-07(C)(1))

f) Testing Requirements

- (1) None.

g) Miscellaneous Requirements

- (1) None.