



Environmental
Protection Agency

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

5/7/2010

Timothy Collette
HONEYWELL CPG FRAM OPERATIONS
851 JACKSON ST
GREENVILLE, OH 45331

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0819070018
Permit Number: P0091762
Permit Type: Renewal
County: Darke

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions, please contact Regional Air Pollution Control Agency at (937)225-4435 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: RAPCA



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
HONEYWELL CPG FRAM OPERATIONS**

Facility ID: 0819070018
Permit Number: P0091762
Permit Type: Renewal
Issued: 5/7/2010
Effective: 5/7/2010
Expiration: 5/7/2015



Division of Air Pollution Control
Permit-to-Install and Operate
for
HONEYWELL CPG FRAM OPERATIONS

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Authorization

Facility ID: 0819070018
Application Number(s): A0023160, A0023161
Permit Number: P0091762
Permit Description: Renewal FEPTIO for electric paper curing ovens.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 5/7/2010
Effective Date: 5/7/2010
Expiration Date: 5/7/2015
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

HONEYWELL CPG FRAM OPERATIONS
851 JACKSON ST
GREENVILLE, OH 45331

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

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

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0091762
Permit Description: Renewal FEPTIO for electric paper curing ovens.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Group Name: Electric Paper Curing Ovens

Emissions Unit ID:	P036
Company Equipment ID:	Paper curing oven
Superseded Permit Number:	08-2012
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P037
Company Equipment ID:	Paper curing oven
Superseded Permit Number:	08-2012
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Regional Air Pollution Control Agency in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit 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.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Electric Paper Curing Ovens: P036, P037

EU ID	Operations, Property and/or Equipment Description
P036	Two Electric Paper Curing Ovens
P037	Two Electric Paper Curing Ovens

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - a. None.
 - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - a. 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(A)(3)	The volatile organic compound (VOC) emissions from each oven shall not exceed 0.75 pound per hour (lb/hr), 15 pounds per day (lbs/day), and 2.70 tons per year (TPY). See b)(2)a.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions (PE) from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V	The phenol emissions from each oven shall not exceed 0.27 lb/hr, 6.52 lbs/day, and 1.19 TPY. The formaldehyde emissions from each oven shall not exceed 0.09 lb/hr, 2.28 lbs/day, and 0.42 TPY.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The methanol emissions from each oven shall not exceed 0.01 lb/hour, 0.33 lb/day, and 0.06 TPY. See b)(2)b, c)(1) and c)(2).
d.	OAC rule 3745-21-07(G)(1) effective 6/15/1999	The limits based on this rule are less stringent than the limits established above.

(2) Additional Terms and Conditions

- a. Emissions units P036 and P037 each consists of two electric paper curing ovens.
- b. The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.
- c. 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: b)(1)d.

c) Operational Restrictions

- (1) The maximum hourly paper production rate shall not exceed 271 pounds for each cure oven.
- (2) The maximum daily paper production rate shall not exceed 6,516 pounds for each cure oven.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each day for each cure oven:
 - a. The total pounds of paper cured.
 - b. The total volatile organic compound emission rate, in pounds (see f)(1)b for the calculation methodology).
 - c. The total phenol emission rate, in pounds (see f)(1)e for the calculation methodology).

- d. The total formaldehyde emission rate, in pounds (see f)(1)h for the calculation methodology).
 - e. The total methanol emission rate, in pounds (see f)(1)k for the calculation methodology).
 - f. The total number of hours of operation.
 - g. The average hourly volatile organic compound emission rate, i.e., [d)(1)b]/[d)(1)f], in pounds per hour.
 - h. The average hourly phenol emission rate, i.e., [d)(1)c]/[d)(1)f], in pounds per hour.
 - i. The average hourly formaldehyde emission rate, i.e., [d)(1)d]/[d)(1)f], in pounds per hour.
 - j. The average hourly methanol emission rate, i.e., [d)(1)e]/[d)(1)f], in pounds per hour.
- (2) The permittee shall collect and record the following information each month for each cure oven:
- a. The total phenol, formaldehyde, methanol, and total combined HAPs emission rates, in tons, for each oven.
 - b. The rolling, 12-month summation of the phenol, formaldehyde, methanol, and total combined HAPs emission rates for each oven.
- (3) The permittee shall collect and record the following information each month for the entire facility:
- a. The total individual Hazardous Air Pollutant (HAP)* emission rate, in tons per month, for each HAP employed at this facility.
 - b. The rolling, 12-month summation of the total individual HAP emissions from all emissions units at the facility, in tons.
 - c. The total combined HAP emission rate, in tons per month, for all of the HAPs employed at this facility.
 - d. The rolling, 12-month summation of the total combined HAP emissions from all emissions units at the facility, in tons.
- *A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.
- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack 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 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 daily 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.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the maximum hourly paper production rate 271 pounds of paper per hour for each cure oven.
 - ii. all exceedances of the maximum daily paper production rate of 6,516 pounds of paper per day for each cure oven.
 - iii. all exceedances of the rolling, 12-month individual HAP emission limitation; and
 - iv. all exceedances of the rolling, 12-month total combined HAP emission limitation.
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(4) above:
 - a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (4) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitation(s) in b)(1) of these terms and conditions shall be determined in accordance with the following method(s):
 - a. Emission Limitation
The VOC emissions from each paper curing oven shall not exceed 0.75 lb/hour.
Applicable Compliance Method
Compliance shall be based upon the record keeping as specified in d)(1). If required, compliance shall be based upon stack testing performed in accordance with USEPA Reference Method 18 or 25.
 - b. Emission Limitation
The VOC emissions from each paper curing oven shall not exceed 15 lbs/day.
Applicable Compliance Method
Compliance shall be based upon the record keeping as specified in d)(1) and shall be calculated using the following equation:
$$\text{lbs VOC/day} = (\text{lbs paper produced/day}) \times (0.0014 \text{ lb VOC/lb paper})$$

The 0.0014 lb VOC/lb paper value was obtained from the manufacturer's data. The VOC content emission factor is subject to revision, if necessary, based upon the results of any stack tests performed.

c. Emission Limitation

The VOC emissions from each paper curing oven shall not exceed 2.70 TPY.

Applicable Compliance Method

Compliance shall be based upon the record keeping as specified in d)(1) and shall be the sum of the daily volatile organic compound emission rates for the calendar year divided by 2,000 pounds per ton

d. Emission Limitation

The phenol emissions from each paper curing oven shall not exceed 0.27 lb/hour.

Applicable Compliance Method

Compliance shall be based upon the record keeping as specified in d)(1). If required, compliance shall be based upon stack testing performed in accordance with USEPA Reference Method 18.

e. Emission Limitation

The phenol emissions from each paper curing oven shall not exceed 6.52 lbs/day.

Applicable Compliance Method

Compliance shall be based upon the record keeping as specified in d)(1) and shall be calculated using the following equation:

$$\text{lbs phenol/day} = (\text{lbs paper produced/day}) \times (0.001 \text{ lb phenol/lb paper})$$

The 0.001 lb phenol/lb paper value was obtained from the manufacturer's data. The phenol content emission factor is subject to revision, if necessary, based upon the results of any stack tests performed.

f. Emission Limitation

The phenol emissions from each paper curing oven shall not exceed 1.19 TPY.

Applicable Compliance Method

Compliance shall be based on the record keeping as specified in d)(1) and shall be the sum of the daily phenol emission rates for the calendar year divided by 2,000 pounds per ton.

g. Emission Limitation

The formaldehyde emissions from each paper curing oven shall not exceed 0.09 lb/hour.

Applicable Compliance Method

Compliance shall be based upon the record keeping as specified in d)(1). If required, compliance shall be based upon stack testing performed in accordance with USEPA Reference Method 18.

h. Emission Limitation

The formaldehyde emissions from each paper curing oven shall not exceed 2.28 lbs/day.

Applicable Compliance Method

Compliance shall be based upon the record keeping as specified in d)(1) and shall be the calculated using the following equation:

$$\text{lbs formaldehyde/day} = (\text{lbs paper produced/day}) \times (0.00035 \text{ lb formaldehyde/lb paper})$$

The 0.00035 lb formaldehyde/lb paper value was obtained from the manufacturer's data. The formaldehyde content emission factor is subject to revision, if necessary, based upon the results of any stack tests performed.

i. Emission Limitation

The formaldehyde emissions from each paper curing oven shall not exceed 0.42 TPY.

Applicable Compliance Method

Compliance shall be based upon the record keeping as specified in d)(1) and shall be the sum of the daily formaldehyde emission rates for the calendar year divided by 2,000 pounds per ton.

j. Emission Limitation

The methanol emissions from each paper curing oven shall not exceed 0.01 lb/hour.

Applicable Compliance Method

Compliance shall be based upon the record keeping as specified in d)(1). If required, compliance shall be based upon stack testing performed in accordance with USEPA Reference Method 18.

k. Emission Limitation

The methanol emissions from each paper curing oven shall not exceed 0.33 lb/day.

Applicable Compliance Method

Compliance shall be based upon the record keeping as specified in d)(1) and shall be calculated using the following equation:

$$\text{lbs methanol/day} = (\text{lbs paper produced/day}) \times (0.00005 \text{ lb methanol/lb paper})$$

The 0.00005 lb methanol/lb paper value was obtained from the manufacturer's data. The methanol content emission factor is subject to revision, if necessary, based upon the results of any stack tests performed.

l. Emission Limitation

The methanol emissions from each paper curing oven shall not exceed 0.06 TPY.

Applicable Compliance Method

Compliance shall be based upon the record keeping as specified in d)(1) and shall be the sum of the daily methanol emission rates for the calendar year divided by 2,000 pounds per ton.

m. Emission Limitation

The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, per rolling, 12-month summation.

Applicable Compliance Method

Compliance shall be based upon the monthly record keeping as specified in d)(3) of this permit. The HAP content of each material employed shall be based upon formulation data.

n. Emission Limitation

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

- (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 within one year after issuance of the permit.
- b. The emission testing shall be conducted to demonstrate compliance with the VOC, phenol, formaldehyde and methanol in the appropriate averaging period(s).
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

OC Method 18 or 25 of 40 CFR Part 60, Appendix A

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. In order to determine the uncontrolled mass rate of condensable and filterable particulate emissions from the emissions unit, for purposes of establishing a particulate matter limit, Method 5E of 40 CFR Part 60, Appendix A shall be conducted.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- f. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- g. Personnel from the appropriate Ohio EPA District Office or local air agency 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.
- h. 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

- (1) Equivalent types of paper are permitted to be used, provided the organic and hazardous compound contents, and corresponding emission rates do not exceed that which is represented by this permit to install and operate and the data presented in the company's application. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) 30 days prior to any addition or substitution of a different type of paper.
- (2) This permit supersedes PTI 08-2012 issued June 24, 1994 and represents no increase in emissions.