



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

05/29/02

CERTIFIED MAIL

RE: Final Title V Chapter 3745-77 permit

14-09-00-0003
Crystal Tissue Company
Michael A. McKenna
3120 S. Verity Parkway
Middletown, OH 45044-7494

Dear Michael A. McKenna:

Enclosed is the Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully.

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

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Hamilton County Dept. of Environmental Services.

Very truly yours,

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

cc: Hamilton County Dept. of Environmental Services
File, DAPC PMU



State of Ohio Environmental Protection Agency

FINAL TITLE V PERMIT

Issue Date: 05/29/02	Effective Date: 05/29/02	Expiration Date: 05/29/07
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This document constitutes issuance of a Title V permit for Facility ID: 14-09-00-0003 to:

Crystal Tissue Company
3120 S. Verity Parkway
Middletown, OH 45044-7494

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B001 (No. 4 Boiler, with ESP)
122.5 MMBtu/hr Riley Pulverized Coal-Fired
Boiler (No. 4 Boiler),
with Cyclones and Electrostatic Precipitation

B002 (No. 3 Boiler)
75MMBtu/hr Oil-Fired Backup Boiler (No. 3
Boiler)

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. 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. 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, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. *State and Federally Enforceable Section*

1. **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, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
(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. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly

reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.6 below if no deviations occurred during the quarter.

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

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

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

- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

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

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset condition, of any emissions unit(s) or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upset conditions.

Except as provided in OAC rule 3745-15-06, 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).

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

3. Risk Management Plans

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

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

4. Title IV Provisions

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

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

5. Severability Clause

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

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 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.

(Authority for term: OAC rule 3745-77-07(A)(7))

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

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

8. 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))

9. 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 general terms and conditions shall apply to all operating scenarios authorized in this permit.

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

10. 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))

11. 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))

12. 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:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- 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:
 - i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. 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.
- iii. 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))

13. 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))

14. 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))

15. 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))

16. 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 emission 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; and
- 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.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

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

17. 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.)

18. Insignificant Activities

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

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

19. 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))

20. 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))

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

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 (a) 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, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

2. Records Retention Requirements

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.

3. 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.

4. 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).

5. 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.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

1. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

B. State Only Enforceable Section

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

F001 Plant Roadways and Parking Areas;
F002 Material Handling, Truck Hauling, Coal Unloading and Coal Conveying/Transfer;
F003 Coal Stockpiling;
P001 Paper Machine No. 4;
P002 Paper Machine No. 5;
P003 Paper Machine No. 6;
T001 15,000-Gallon No. 2 Fuel Oil Tank;
Z001 Secondary Fiber Hydrapulper System;
Z007 Safety Kleen Parts Washer;
Z008 10,000-Gallon Melamine Formaldehyde Wet Strength Resin Tank #1 (vapor pressure < 0.4 psia);
Z009 10,000-Gallon Melamine Formaldehyde Wet Strength Resin Tank #2 (vapor pressure < 0.4 psia); and
Z010 Wastewater Treatment System.

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 a permit to install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: No. 4 Boiler, with ESP (B001)
Activity Description: 122.5 MMBtu/hr Riley Pulverized Coal-Fired Boiler (No. 4 Boiler), with Cyclones and Electrostatic Precipitation

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
122.5 MMBtu/hr pulverized coal and No. 2 fuel oil-fired boiler controlled with cyclones and an electrostatic precipitator (ESP) - No. 4 Boiler	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)(1)	0.020 lb of PE/MMBtu of actual heat input when burning No. 2 fuel oil
	OAC rule 3745-17-10(C)(1)	0.19 lb of PE/MMBtu of actual heat input when burning coal
	OAC rule 3745-18-15(B)	1.6 lbs of sulfur dioxide (SO ₂)/MMBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The quality of the coal burned in this emissions unit shall meet the following specifications on an "as-received" wet basis:
 - a. a combination of ash content and heat content which is sufficient to comply with the allowable particulate emission limitation of 0.19 lb of PE/MMBtu of actual heat input after treatment by the cyclones and ESP; and
 - b. a combination of sulfur content and heat content which is sufficient to comply with the allowable SO₂ emission limitation of 1.6 lbs of SO₂/MMBtu of actual heat input.
2. The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable SO₂ emission limitation specified in section A.I.1 above.
3. When burning coal, the permittee shall operate the ESP during any operation of this emissions unit, except during periods of start-up and shutdown that are exempted pursuant to OAC rules 3745-17-07(A)(3)(a)(i) and 3745-17-07(A)(3)(b)(i), or during malfunctions that are exempted pursuant to OAC rule 3745-17-07(A)(3)(c).

II. Operational Restrictions (continued)

4. The average total combined power input (in kilowatts) to all fields of the ESP, for any 3-hour block of time when the emissions unit is in operation, shall be no less than 90 percent of the total combined power input, as a 3-hour average, during the most recent emission tests that demonstrated the emissions unit was in compliance with the particulate emission limitation. Based on the voltage and current data from the most recent emission tests that demonstrated that the emissions unit was in compliance, the minimum total combined power input is 2.3 kilowatts.

The operation of the control equipment below the minimum total combined power input level specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Hamilton County Department of Environmental Services, compliance with the mass emission limitation and visible emission limitations shall be determined by performing concurrent mass emission tests and visible emissions observations, using USEPA-approved methods and procedures. The results of any required emission tests and visible emission observations shall be used in determining whether or not the operation of the control equipment below the minimum total combined power input level specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitations.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; 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, respectively. Alternative, equivalent methods may be used upon written approval from the Hamilton County Department of Environmental Services.

2. The permittee shall maintain monthly records of the total quantity of coal received, the results of the analyses for ash content, sulfur content, and heat content, and the calculated average SO₂ emission rate for the month, in lbs/MMBtu of actual heat input.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO₂ emission rate (in lbs/MMBtu). (The SO₂ emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

III. Monitoring and/or Record Keeping Requirements (continued)

4. The permittee shall operate and maintain a temperature monitor and recorder that measures and records the temperature of the boiler exhaust gases entering the ESP during:
 - a. all periods of start-up until the ESP is operational or until the inlet temperature of the ESP achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i); and
 - b. all periods of shutdown until the inlet temperature of the ESP drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i).

The temperature monitor and recorder 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.

5. The permittee shall monitor and record the following on an hourly basis during any operation of the ESP:
 - a. the secondary voltage, in kilovolts (kV), and the secondary current in milliamps, for each transformer rectifier (TR) set in the ESP;
 - b. the power input (in kilowatts) of each TR set for each hour (calculated by multiplying the secondary voltage (in kilovolts) by the secondary current (in milliamps/1000) for each TR set); and
 - c. the total power input to the ESP for each hour (add together the power inputs for the TR sets operating during the hour).

Should a mechanical failure occur which prevents the secondary voltage and current data from being monitored and recorded, the primary voltage and current data shall be monitored and recorded in lieu of the secondary voltage and current data and shall be used to calculate the total power input to the ESP in accordance with sections A.III.5.a through A.III.5.c above. The permittee shall make all necessary repairs to correct any mechanical failure which prevents the secondary voltage from being monitored and recorded as soon as practical, but not to exceed 60 days after the occurrence.

IV. Reporting Requirements

1. Quarterly reports shall be submitted concerning the quantity and quality 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 calculated average SO₂ emission rate (lbs of SO₂/MMBtu of actual heat input) from the coal received.
2. The permittee shall notify the Director (the Hamilton County Department of Environmental Services) in writing of any record which shows a deviation of the allowable SO₂ emission limitation based upon the calculated SO₂ emission rates from section A.III above. The notification shall include a copy of such record and shall be sent to the Director (the Hamilton County Department of Environmental Services) within 45 days after the deviation occurs.

IV. Reporting Requirements (continued)

3. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during start-up and shutdown of the emissions unit when the ESP was not in operation, coal was being burned, and the temperature of the boiler exhaust gases exceeded the temperature levels specified in OAC rules 3745-17-07(A)(3)(a)(i) and (b)(i). The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii.
4. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average total combined power input to all fields of the ESP does not comply with the operational restriction specified in section A.II.4 of this permit. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii.

V. Testing Requirements

1. Emission Limitation-
Visible PE from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method-
If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).
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 expiration.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable particulate mass emission rate of 0.19 lb of PE/MMBtu of actual heat input, when burning coal.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable particulate mass emission rate:

Methods 1 through 5 of 40 CFR Part 60, Appendix A.
 - d. During the test, the primary and secondary voltage and current at each ESP TR set shall be recorded at least every 15 minutes.

The recorded primary and secondary voltage and current values shall be used to establish the minimum total power input value(s) that correspond to the proper operation of the ESP serving this emissions unit during the emission tests that demonstrate that the emissions unit is in compliance with the applicable emission limitations
 - e. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

V. Testing Requirements (continued)

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, and the person(s) who will be conducting the test. 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.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission tests 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, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

3. Emission Limitation-
0.020 lb of PE/MMBtu of actual heat input when burning No. 2 fuel oil

Applicable Compliance Method-

Compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (3000 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (122.5 MMBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation above in accordance with OAC rule 3745-17-03(B)(9).

4. Emission Limitation-
1.6 lbs of SO₂/MMBtu of actual heat input

Applicable Compliance Method-

Compliance with the SO₂ emission limitation may be demonstrated based upon the records required pursuant to sections A.III.1 through A.III.3 of this permit.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests (when firing coal) performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6C.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: No. 3 Boiler (B002)
Activity Description: 75MMBtu/hr Oil-Fired Backup Boiler (No. 3 Boiler)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
75 MMBtu/hr No. 2 oil-fired boiler - No. 3 Boiler	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)(1)	0.020 lb of PE/MMBtu of actual heat input
	OAC rule 3745-18-15(B)	1.6 lbs of sulfur dioxide (SO ₂)/MMBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable SO₂ emission limitation specified in section A.I.1 above.
- The permittee shall burn only No. 2 fuel oil in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

- For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO₂ emission rate (in lbs/MMBtu). (The SO₂ emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

III. Monitoring and/or Record Keeping Requirements (continued)

2. For each day during which the permittee burns a fuel other than No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall notify the Director (the Hamilton County Department of Environmental Services) in writing of any record which shows a deviation of the allowable SO₂ emission limitation based upon the calculated SO₂ emission rates from section A.III above. The notification shall include a copy of such record and shall be sent to the Director (the Hamilton County Department of Environmental Services) within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than No. 2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

1. Emission Limitation-
Visible PE from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method-

If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).

2. Emission Limitation-
0.020 lb of PE/MMBtu of actual heat input

Applicable Compliance Method-

Compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (2500 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (75 MMBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation through emission tests performed in accordance with OAC rule 3745-17-03(B)(9).

3. Emission Limitation-
1.6 lbs of SO₂/MMBtu of actual heat input

Applicable Compliance Method-

Compliance with the allowable SO₂ emission limitation may be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

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 6C.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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