



Environmental
Protection Agency

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

6/11/2010

Certified Mail

Denise Curry
Wausau Paper Towel & Tissue, LLC
700 Columbia Ave.
Middletown, OH 45042

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1409010043
Permit Number: P0105930
Permit Type: Administrative Modification
County: Butler

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
Yes	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Journal News. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777.

Sincerely,


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

Cc: U.S. EPA Region 5 - *Via E-Mail Notification*
HCDOES; Indiana; Kentucky



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Wausau Paper is a recycler and manufacturer of paper towels and tissues.

3. Facility Emissions and Attainment Status:

Wausau is in Butler County, which is nonattainment for ozone and PM2.5. This Permit Action is an Administrative Modification of PTI 14-05967 issued 11/20/2007 as a modification made to allow for plant expansion. The permittee provided an analysis demonstrating that the expansion project was not a major modification when the permit was modified in 2007, as a netting and synthetic minor permit.

In late 2009 stack testing required by the 2007 modified permit revealed that the emissions factors used for the 2007 permit were not accurate for VOC emissions from the paper machines, de-inking systems and the broke system. In most cases the correct emissions factors showed the maximum potential to emit (PTE) VOC emissions to be considerably less than originally calculated. In the case of the de-inking, however, there was a modest increase in the PTE. This application requests that the emissions calculations and permit limits be revised to reflect the more accurate factors from the recent compliance testing. The increase will not affect the synthetic minor status.

4. Source Emissions:

Particulate, SO2, NOx, CO and lead emissions from the sources are unchanged. The PTE VOC emissions from the paper machines were first calculated to be 68.07 tpy but are now calculated to be 21.98 tpy. The max potential VOC emissions from deinking were first calculated to be 4.67 tpy and are now calculated to be 5.88 tpy. Permit limits will be set at 15% higher to allow for testing variability.

5. Conclusion:

Wausau should be issued an Administrative Modification reflecting the more recent, more accurate emissions factors.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	28.74

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Wausau Paper Towel & Tissue, LLC

Issue Date: 6/11/2010
Permit Number: P0105930
Permit Type: Administrative Modification
Permit Description: Administrative Modification of PTI to change emissions limitations based on emissions factors developed during stack testing
Facility ID: 1409010043
Facility Location: Wausau Paper Towel & Tissue, LLC
700 Columbia Ave.,
Middletown, OH 45042
Facility Description: Paper (except Newsprint) Mills

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Paul Tedtman at Hamilton County Dept. of Environmental Services, 250 William Howard Taft Pkwy., Cincinnati, OH 45219-2660 or (513)946-7777. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc

Ohio

**Environmental
Protection Agency**

DRAFT

**Division of Air Pollution Control
Permit-to-Install
for
Wausau Paper Towel & Tissue, LLC**

Facility ID: 1409010043
Permit Number: P0105930
Permit Type: Administrative Modification
Issued: 6/11/2010
Effective: To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Wausau Paper Towel & Tissue, LLC

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Authorization

Facility ID: 1409010043
Facility Description: Paper products.
Application Number(s): M0000697, M0000785
Permit Number: P0105930
Permit Description: Administrative Modification of PTI to change emissions limitations based on emissions factors developed during stack testing
Permit Type: Administrative Modification
Permit Fee: \$2,500.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 6/11/2010
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Wausau Paper Towel & Tissue, LLC
700 Columbia Ave.
Middletown, OH 45042

of a Permit-to-Install 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:

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 Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0105930
Permit Description: Administrative Modification of PTI to change emissions limitations based on emissions factors developed during stack testing

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

- Emissions Unit ID:** P101
Company Equipment ID: Paper Machine No.1 (BWP)
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID:** P102
Company Equipment ID: Paper Machine No. 2 (BWP)
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID:** P103
Company Equipment ID: Natural De-Inking Plant (BWP)
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID:** P104
Company Equipment ID: Bleach De-Inking Plant (BWP)
Superseded Permit Number:
General Permit Category and Type: Not Applicable
- Emissions Unit ID:** P107
Company Equipment ID: Broke System (BWP)
Superseded Permit Number:
General Permit Category and Type: Not Applicable

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.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.

- 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, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying 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.

4. 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:
 - (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.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Hamilton County Dept. of Environmental Services.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Hamilton County Dept. of Environmental Services. The written 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. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Hamilton County Dept. of Environmental Services every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. 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.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- c) 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:



Effective Date: To be entered upon final issuance

- (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 ORC section 3704.08.
 - (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.
- d) The permittee shall submit progress reports to the Hamilton County Dept. of Environmental Services 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Hamilton County Dept. of Environmental Services.

- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Hamilton County Dept. of Environmental Services. 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.)

10. Applicability

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

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.



- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

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

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. 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.

19. 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.

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:

None.

C. Emissions Unit Terms and Conditions



1. P101, Paper Machine No.1 (BWP)

Operations, Property and/or Equipment Description:

Paper Machine No. 1 - Modification

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(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 3.57 pounds per hour*, excluding off-line wire & felt cleaning and drying hoods.</p> <p>The drying hoods on this emissions unit shall not exceed the following emission limitations:</p> <p>When burning natural gas, 2.88 pounds of carbon monoxide (CO) per hour*, 3.43 pounds of nitrogen oxides (NOx) per hour*, and 0.19 pound of VOC per hour*.</p> <p>When burning LPG (propane), 1.22 pounds of CO per hour*, 7.27 pounds of nitrogen oxides (NOx) per hour*, and 0.11 pound of VOC per hour*.</p> <p>When burning any combination of natural gas or LPG, 12.62 tons per year (TPY) of CO emissions*.</p> <p>*The hourly and annual emission limitations outlined above are based on the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with these limitations.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)a.i. The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G) and OAC rule 3745-31-05(C).
b.	OAC rule 3745-31-05(C) Voluntary Restriction to Avoid Non-Attainment New Source Review and Prevention of Significant Deterioration	See b)(2)a.ii., b)(2)b., b)(2)c., c)(3), and c)(4).
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack associated with this emissions unit shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-21-07(G)	Exempt. See c)(1).
e.	OAC rule 3745-18-06(E)(2)	Sulfur dioxide (SO ₂) emissions shall not exceed 194.7 pounds per hour.
f.	ORC rule 3704.03(T)(4)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The maximum total emissions from emissions units P101 and P102, combined, shall not exceed the following emission limitations from off-line wire and felt cleaning operations:
 - i. 325 pounds of VOC per hour*; and
 - ii. 39 TPY of VOC, based upon a rolling, 12-month summation.

*The hourly emission limitation outlined above is based on the potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limitation.
- b. The maximum total emissions from emissions units P101 and P102, combined, excluding drying hoods and off-line wire/felt cleaning, shall not exceed the following emission limitation based upon a rolling, 12-month summation:

21.98 TPY of VOC.
- c. The maximum total annual emissions from the drying hoods on emissions units P101 and P102, combined, when burning any combination of natural gas or LPG, shall not exceed the following emission limitations based upon a rolling, 12-month summation:



1.07 TPY of PE;

2.59 TPY of particulate matter 10 microns and less in diameter (PM10);

39.9 TPY of NOx; and

1.47 TPY of VOC.

- d. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO₂, PE and PM₁₀ emissions associated with this air contaminant source since the uncontrolled potential to emit for SO₂, PE and PM₁₀ is less than 10 TPY.
- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations, the use of natural gas and/or propane, and the use of non-photochemically reactive materials.

c) Operational Restrictions

- (1) This emissions unit currently does not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).
- (2) The permittee shall burn only natural gas or LPG (propane) in this emissions unit.
- (3) The maximum annual VOC input, as applied, of liquid organic materials employed by the off-line wire and felt cleaning operations in emissions units P101 and P102, combined, shall not exceed 39 tons per year as a rolling 12-month summation. The VOC input shall be determined by multiplying the gallons of liquid organic materials employed per month by the VOC content of each liquid organic material (see record keeping requirements in d)(3)).

The permittee has existing records to demonstrate compliance upon issuance of this permit, therefore first year VOC input amounts are not necessary.

- (4) The maximum annual processing rate for emissions units P101 and P102, combined, shall not exceed 145,845 TPY, based upon a rolling, 12-month summation of machine dried tons of paper (MDTP).

The permittee has existing records to demonstrate compliance upon issuance of this permit, therefore first year MDTP amounts are not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.

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- (3) The permittee shall collect and record the following information each month for emissions units P101 and P102, combined, from the off-line wire and felt cleaning operations:
- the name and identification of each solvent employed;
 - the VOC content of each solvent employed, in pounds per gallon;
 - the number of gallons of each solvent employed;
 - the monthly VOC input (the summation of the results of the value from line b. multiplied by the value from line c. for each liquid organic material employed);
 - the updated rolling, 12-month summation total, in tons, of VOC input (the total amount of VOC input for the current month recorded in line d. plus the total amount of VOC input for the previous eleven calendar months); and
 - the updated rolling, 12-month summation total, in tons, of VOC emissions (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months), assuming 100 percent of VOC input value from line e. is emitted to the air.
- (4) The permittee shall collect and record the following information each month for emissions units P101 and P102, combined, excluding off-line wire and felt cleaning and the drying hoods:
- the total amount of machine dried tons of paper (MDTP), in tons per month;
 - the updated rolling, 12-month summation of MDTP, in tons (the total amount of tons for the current month plus the total amount of tons for the previous eleven calendar months);
 - the total emissions, in tons, of VOC calculated by the following equation:
$$E = [(MDTP/month \text{ for emissions unit P101} \times 0.2188 \text{ lb of VOC/MDTP}^*) + (MDTP/month \text{ for emissions unit P102} \times 0.5069 \text{ lb of VOC/MDTP}^*)]/2000,$$
where E = Emission Rate (tons per month).

*the emission factors established during the most recent emission test for these emissions units (October 23-23, 2009).
 - the updated rolling, 12-month summation emissions total, in tons, of VOC (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).
- (5) The permittee shall collect and record the following information each month for emissions units P101 and P102:
- the combined amount of LPG used in the drying hoods associated with emissions units P101 and P102, in gallons per month;

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- b. the combined amount of natural gas used in the drying hoods associated with emissions units P101 and P102, in cubic feet per month;
 - c. the monthly combined PE, PM10, NO_x, and VOC emissions from the drying hoods associated with emissions units P101 and P102; and
 - d. the updated, rolling, 12-month summation of PE, PM10, VOC and NO_x emissions from the drying hoods associated with emissions units P101 and P102 combined (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).
- e) Reporting Requirements
- (1) The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
 - (2) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any fuel burned in this emissions unit other than natural gas or LPG (propane). The notification shall include a copy of such record and shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the deviation occurs.
 - (3) The permittee shall submit annual reports that specify the total VOC and NO_x emissions from this emissions unit for the calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit the annual Fee Emission Report.
 - (4) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. an identification of all exceedances of the rolling, 12-month VOC input operational restriction for the off-line wire and felt cleaning operations on emissions units P101 and P102, combined, as specified in c)(3);
 - b. an identification of all exceedances of the rolling, 12-month emissions limitation for VOC from the off-line wire and felt cleaning operations on emissions units P101 and P102, combined, as specified in b)(2)a.ii.;
 - c. an identification of all exceedances of the rolling, 12-month MDTP operational restriction for emissions units P101 and P102, combined, as specified in c)(4);
 - d. an identification of all exceedances of the rolling, 12-month emissions limitation for VOC for emissions units P101 and P102, combined, (excluding drying hoods and off-line wire/felt cleaning operations), as specified in b)(2)b; and

- e. an identification of all exceedances of the rolling, 12-month emission limitations for PE, PM10, VOC, and NOx from the drying hoods on emissions units P101 and P102, combined, when burning any combination of natural gas or LPG, as specified in b)(2)c.
- (5) The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit unless otherwise specified.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

VOC emissions shall not exceed 3.57 pounds per hour, excluding off-line wire & felt cleaning and drying hoods.

Applicable Compliance Method:

The hourly VOC emission rate is based on this emissions unit's uncontrolled potential to emit, excluding off-line wire & felt cleaning and drying hoods. The hourly VOC emission rate was calculated by the following equation using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007 and emission test data from testing October 23-23, 2009:

$$E = \text{the maximum machine dried tons paper (MDTP) capacity of 16.3 tons/hour} \times 0.2188 \text{ lb of VOC/MDTP per permittee-supplied 2009 emission test data from paper making operations;}$$

where E = Emission Rate (pounds per hour).
 - b. Emission Limitations:

The drying hoods on this emissions unit shall not exceed the following emission limitations:

 - 2.88 lbs of CO/hour when burning natural gas;
 - 3.43 lbs of NOx/hour when burning natural gas;
 - 0.19 lb of VOC/hour when burning natural gas;
 - 1.22 lbs of CO/hur when burning LPG;
 - 7.27 lbs of NOx/hour when burning LPG; and
 - 0.11 lb of VOC/hour when burning LPG.

Applicable Compliance Method:

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The hourly CO, VOC, and NO_x emission rates listed above are based on this emissions unit's uncontrolled potential to emit from the drying hoods. The hourly emission rates were calculated by the following equations using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

For natural gas combustion:

E_{CO} = heat input capacity of 35 mmBtu/hour x 0.0823 lb of CO/mmBtu per AP-42 Table 1.4-1 for natural gas combustion;

E_{NOx} = heat input capacity of 35 mmBtu/hour x 0.098 lb of NO_x/mmBtu per AP-42 Table 1.4-1 for natural gas combustion;

E_{VOC} = heat input capacity of 35 mmBtu/hour x 0.00539 lb of VOC/mmBtu per AP-42 Table 1.4-2 for natural gas combustion; and

For LPG (propane) combustion:

E_{CO} = heat input capacity of 35 mmBtu/hour x 0.0349 lb of CO/mmBtu per AP-42 Table 1.5-1 for LPG combustion;

E_{NOx} = heat input capacity of 35 mmBtu/hour x 0.2076 lb of NO_x/mmBtu per AP-42 Table 1.5-1 for LPG combustion;

E_{VOC} = heat input capacity of 35 mmBtu/hour x 0.00328 lb of VOC/mmBtu per AP-42 Table 1.5-1 for LPG combustion

where E = Emission Rate_(Pollutant) (pounds per hour).

c. Emission Limitation:

CO emissions from the drying hoods shall not exceed 12.62 TPY when burning any combination of natural gas or LPG.

Applicable Compliance Method:

The annual CO emission rate is based on this emissions unit's uncontrolled potential to emit from the drying hoods when burning natural gas as worst case fuel. The annual CO emission rate was calculated by the following equations using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

For natural gas combustion:

E = heat input capacity of 35 mmBtu/hour x 0.0823 lb of CO/mmBtu per AP-42 Table 1.4-1 for natural gas combustion x 8760 hours/(2000)]; and

For LPG (propane) combustion:



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$E = \text{heat input capacity of } 35 \text{ mmBtu/hour} \times 0.0349 \text{ lb of CO/mmBtu per AP-42 Table 1.5-1 for LPG combustion} \times 8760 \text{ hours}/(2000)$];

where $E = \text{Emission Rate (tons per year)}$.

d. Emission Limitation:

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

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).

e. Emission Limitations:

325 pounds per hour of VOC, from off-line wire and felt cleaning on emissions units P101 and P102, combined; and

39 TPY of VOC, from off-line wire and felt cleaning on emissions units P101 and P102, combined.

Applicable Compliance Method:

The hourly VOC emission rate is based on the combined emissions units' uncontrolled potential to emit for off-line wire and felt cleaning operations. The hourly VOC emission rate was calculated by the following equation using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

$E = \text{maximum solvent usage rate of } 50 \text{ gallons per hour} \times 6.5 \text{ lbs of VOC per gallon of solvent}$;

where $E = \text{Emission Rate (pounds per hour)}$.

Compliance with the annual VOC emission limitation shall be determined by compliance with the VOC input restriction specified in c)(3) and the record keeping requirements specified in d)(3).

f. Emission Limitation:

21.98 TPY of VOC from emissions units P101 and P102, combined, excluding drying hoods and off-line wire/felt cleaning.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by compliance with the MDTP operational restriction specified in c)(4), record

keeping requirements specified in d)(4), and the emission testing as specified in f)(2).

g. Emission Limitations:

The drying hoods on emissions units P101 and P102, combined, when burning any combination of natural gas or LPG, shall not exceed the following emission limitations based upon a rolling, 12-month summation:

1.07 TPY of PE;

2.59 TPY of PM₁₀;

39.9 TPY of NO_x: and

1.47 TPY of VOC.

Applicable Compliance Method:

Compliance with the PE, PM₁₀, VOC, and NO_x emission limitations specified above shall be determined by the record keeping requirements specified in d)(5).

h. Emission Limitation:

The uncontrolled potential to emit from the drying hoods on this emissions unit is less than 10.0 TPY for SO₂, PE and PM₁₀.

Applicable Compliance Method:

The annual PE, PM₁₀, SO₂ emission rates are based on this emissions unit's uncontrolled potential to emit from the drying hoods. The annual PE, PM₁₀, SO₂ emission rates were calculated by the following equations using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

For natural gas combustion:

$E_{PE} = \text{heat input capacity of } 35 \text{ mmBtu/hour} \times 0.0019 \text{ lb of PE/mmBtu per AP-42 Table 1.4-2 for natural gas combustion} \times 8760 \text{ hours}/(2000)];$

$E_{PM_{10}} = \text{heat input capacity of } 35 \text{ mmBtu/hour} \times 0.0075 \text{ lb of PM}_{10}/\text{mmBtu per AP-42 Table 1.4-2 for natural gas combustion} \times 8760 \text{ hours}/(2000)];$

$E_{SO_2} = \text{heat input capacity of } 35 \text{ mmBtu/hour} \times 0.00058 \text{ lb of SO}_2/\text{mmBtu per AP-42 Table 1.4-2 for natural gas combustion} \times 8760 \text{ hours}/(2000)];$ and

For LPG (propane) combustion:

$E_{PE} = \text{heat input capacity of } 35 \text{ mmBtu/hour} \times 0.00656 \text{ lb of PE/mmBtu per AP-42 Table 1.5-1 for LPG combustion} \times 8760 \text{ hours}/(2000)];$

E_{PM10} = heat input capacity of 35 mmBtu/hour x 0.0121lb of PM10/mmBtu per AP-42 Table 1.5-1 for natural gas combustion x 8760 hours/(2000)];

E_{SO2} = heat input capacity of 35 mmBtu/hour x 0.00019 lb of SO2/mmBtu per AP-42 Table 1.5-1 for LPG combustion, using a sulfur content of 0.18 gr/100ft³ x 8760 hours/(2000)];

where E = Emission Rate_(Pollutant) (tons per year).

i. Emission Limitation:

SO2 emissions shall not exceed 194.7 pounds per hour.

Applicable Compliance Method:

The hourly SO2 emissions rate is based on the equation in OAC rule 3745-18-06(E)(2) using a process weight rate of 16.3 MDTP per hour.

To determine the actual SO2 emission rate from this emissions unit, the following equations shall be used:

For natural gas combustion:

E = heat input capacity of 35 mmBtu/hour x 0.00058 lb of SO2/mmBtu per AP-42 Table 1.4-2 for natural gas combustion; and

For LPG (propane) combustion:

E = heat input capacity of 35 mmBtu/hour x 0.00019 lb of SO2/mmBtu per AP-42 Table 1.5-1 for LPG combustion, using a sulfur content of 0.18 gr/100ft³;

where E = Emission Rate (pounds per hour).

(2) Emission Testing Requirements:

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 3 months after startup of new emissions unit P107, or within 3 months after modification of existing emissions units P101 and P102, whichever is latest, as identified in this permit to install.
- b. The emission testing shall be conducted to confirm the emission factor of 0.2188 lb of VOC per machine dried tons paper (MDTP) provided by the permittee following stack testing conducted October 23-23, 2009, which is used to demonstrate compliance with the mass allowable VOC emission limitation for this emissions unit and the allowable annual VOC emission limitation contained in this permit to install for emissions units P101 and P102, combined.
- c. The following test method(s) shall be employed to demonstrate compliance with the VOC emission rate(s):

40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 25 or 25A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.

- d. The test shall be conducted while the emissions unit is operating at worst case emission rate conditions, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - 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). The test notification shall include a description of the process parameters identified as being worst case for the proposed emissions 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(s).
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall conduct an onsite pre-test meeting with personnel from the Hamilton County Department of Environmental Services to review the proposed test plan and emission unit operations.
 - g. 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.
 - 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 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) Compliance with the rolling 12-month VOC input restriction for off-line wire and felt cleaning operations specified in c)(3) shall be determined by the record keeping requirements specified in d)(3).
 - (4) Compliance with the rolling 12-month MDTP processing rate restriction specified in c)(4) shall be determined by the record keeping requirements specified in d)(4).
- g) Miscellaneous Requirements
- (1) The terms and conditions in this permit to install shall supercede the terms and conditions for emissions unit P101 contained in permit to install No. 14-05967, issued November 20, 2007.



This source is located in an area that was designated as non-attainment for Particulate Matter less than 2.5 microns (PM2.5) under the National Ambient Air Quality Standards (NAAQS) effective April 5, 2005. Regulations have not yet been promulgated to implement non-attainment new source review for PM2.5. In the absence of implementation regulations, the USEPA issued interim guidance on April 5, 2005, regarding how to address PM2.5 during new source review. For the purpose of this permit to install, pursuant to this USEPA guidance, PM10 was considered a surrogate for PM2.5. Since the PM10 emissions are less than the major modification threshold, the non-attainment new source review requirements do not apply for PM10 and PM2.5.



2. P102, Paper Machine No. 2 (BWP)

Operations, Property and/or Equipment Description:

Paper Machine No. 2 - Modification

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(A)(3)	<p>Volatile organic compound (VOC) emissions shall not exceed 3.09 pounds per hour*, excluding off-line wire & felt cleaning and drying hoods.</p> <p>The drying hoods on this emissions unit shall not exceed the following emission limitations:</p> <p>When burning natural gas, 2.88 pounds of carbon monoxide (CO) per hour*, 3.43 pounds of nitrogen oxides (NOx) per hour*, and 0.19 pound of VOC per hour*.</p> <p>When burning LPG (propane), 1.22 pounds of CO per hour*, 7.27 pounds of nitrogen oxides (NOx) per hour*, and 0.11 pound of VOC per hour*.</p> <p>When burning any combination of natural gas or LPG, 12.62 tons per year (TPY) of CO emissions*.</p> <p>*The hourly and annual emission limitations outlined above are based on the emission unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with these limitations.</p>



Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Rows include references to OAC rules 3745-31-05(C), 3745-17-07(A)(1), 3745-21-07(G), 3745-18-06(E)(2), and ORC rule 3704.03(T)(4).

(2) Additional Terms and Conditions

- a. The maximum total emissions from emissions units P101 and P102, combined, shall not exceed the following emission limitations from off-line wire and felt cleaning operations:
i. 325 pounds VOC per hour*; and
ii. 39 TPY VOC, based upon a rolling, 12-month summation.
*The hourly emission limitation outlined above is based on the potential to emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limitation.
b. The maximum total emissions from emissions units P101 and P102, combined, excluding drying hoods and off-line wire/felt cleaning, shall not exceed the following emission limitation based upon a rolling, 12-month summation:
21.98 TPY of VOC.
c. The maximum total annual emissions from the drying hoods on emissions units P101 and P102, combined, when burning any combination of natural gas or LPG, shall not exceed the following emission limitations based upon a rolling, 12-month summation:



1.07 TPY of PE;

2.59 TPY of particulate matter 10 microns and less in diameter (PM10);

39.9 TPY of NOx; and

1.47 TPY of VOC.

- d. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO₂, PE and PM₁₀ emissions associated with this air contaminant source since the uncontrolled potential to emit for SO₂, PE and PM₁₀ is less than 10 TPY.
- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations, the use of natural gas and/or propane, and the use of non-photochemically reactive materials.

c) Operational Restrictions

- (1) This emissions unit currently does not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).
- (2) The permittee shall burn only natural gas or LPG (propane) in this emissions unit.
- (3) The maximum annual VOC input, as applied, of liquid organic materials employed by the off-line wire and felt cleaning operations in emissions units P101 and P102, combined, shall not exceed 39 tons per year as a rolling 12-month summation. The VOC input shall be determined by multiplying the gallons of liquid organic materials employed per month by the VOC content of each liquid organic material (see record keeping requirements in term d)(3)).

The permittee has existing records to demonstrate compliance upon issuance of this permit, therefore first year VOC input amounts are not necessary.

- (4) The maximum annual processing rate for emissions units P101 and P102, combined, shall not exceed 145,845 TPY, based upon a rolling, 12-month summation of machine dried tons of paper (MDTP).

The permittee has existing records to demonstrate compliance upon issuance of this permit, therefore first year MDTP amounts are not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas or LPG, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain records for each material employed in this emissions unit that indicate whether or not the material is a photochemically reactive material.

- (3) The permittee shall collect and record the following information each month for emissions units P101 and P102, combined, from the off-line wire and felt cleaning operations:
- the name and identification of each solvent employed;
 - the VOC content of each solvent employed, in pounds per gallon;
 - the number of gallons of each solvent employed;
 - the monthly VOC input (the summation of the results of the value from line b. multiplied by the value from line c. for each liquid organic material employed);
 - the updated rolling, 12-month summation total, in tons, of VOC input (the total amount of VOC input for the current month recorded in line d. plus the total amount of VOC input for the previous eleven calendar months); and
 - the updated rolling, 12-month summation total, in tons, of VOC emissions (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months), assuming 100 percent of VOC input value from line e. is emitted to the air.
- (4) The permittee shall collect and record the following information each month for emissions units P101 and P102, combined, excluding off-line wire and felt cleaning and the drying hoods:
- the total amount of machine dried tons of paper (MDTP), in tons per month;
 - the updated rolling, 12-month summation of MDTP, in tons (the total amount of tons for the current month plus the total amount of tons for the previous eleven calendar months);
 - the total emissions, in tons, of VOC calculated by the following equation:
$$E = [(MDTP/month \text{ for emissions unit P101} \times 0.2188 \text{ lb of VOC/MDTP}^*) + (MDTP/month \text{ for emissions unit P102} \times 0.5069 \text{ lb of VOC/MDTP}^*)]/2000,$$
where E = Emission Rate (tons per month).

*the emission factors established during the most recent emission test for these emissions units (October 23-23, 2009).
 - the updated rolling, 12-month summation emissions total, in tons, of VOC (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).
- (5) The permittee shall collect and record the following information each month for emissions units P101 and P102:
- the combined amount of LPG used in the drying hoods associated with emissions units P101 and P102, in gallons per month;

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- b. the combined amount of natural gas used in the drying hoods associated with emissions units P101 and P102, in cubic feet per month;
 - c. the monthly combined PE, PM10, NO_x, and VOC emissions from the drying hoods associated with emissions units P101 and P102; and
 - d. the updated, rolling, 12-month summation of PE, PM10, VOC and NO_x emissions from the drying hoods associated with emissions units P101 and P102 combined (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).
- e) Reporting Requirements
- (1) The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
 - (2) The permittee shall notify the Hamilton County Department of Environmental Services in writing of any fuel burned in this emissions unit other than natural gas or LPG (propane). The notification shall include a copy of such record and shall be submitted to the Hamilton County Department of Environmental Services within 30 days after the deviation occurs.
 - (3) The permittee shall submit annual reports that specify the total VOC and NO_x emissions from this emissions unit for the calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit the annual Fee Emission Report.
 - (4) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. an identification of all exceedances of the rolling, 12-month VOC input operational restriction for the off-line wire and felt cleaning operations on emissions units P101 and P102, combined, as specified in c)(3);
 - b. an identification of all exceedances of the rolling, 12-month emissions limitation for VOC from the off-line wire and felt cleaning operations on emissions units P101 and P102, combined, as specified in b)(2)a.ii.;
 - c. an identification of all exceedances of the rolling, 12-month MDTP operational restriction for emissions units P101 and P102, combined, as specified in c)(4);
 - d. an identification of all exceedances of the rolling, 12-month emissions limitation for VOC for emissions units P101 and P102, combined, (excluding drying hoods and off-line wire/felt cleaning operations), as specified in b)(2)b.;

- e. an identification of all exceedances of the rolling, 12-month emission limitations for PE, PM10, VOC, and NOx from the drying hoods on emissions units P101 and P102, combined, when burning any combination of natural gas or LPG, as specified in b)(2)c.
- (5) The deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit unless otherwise specified.
- f) Testing Requirements
 - (1) Compliance with the emission limitations in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

VOC emissions shall not exceed 3.09 pounds per hour, excluding off-line wire & felt cleaning and drying hoods.

Applicable Compliance Method:

The hourly VOC emission rate is based on this emissions unit's uncontrolled potential to emit, excluding off-line wire & felt cleaning and drying hoods. The hourly VOC emission rate was calculated by the following equation using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007 and emission test data from testing October 23-23, 2009:

$$E = \text{the maximum machine dried tons paper (MDTP) capacity of 6.1 tons/hour} \times 0.5069 \text{ lb of VOC/MDTP per permittee-supplied 2009 emission test data from paper making operations;}$$

where E = Emission Rate (pounds per hour).
 - b. Emission Limitations:

The drying hoods on this emissions unit shall not exceed the following emission limitations:

 - 2.88 lbs of CO/hour when burning natural gas;
 - 3.43 lbs of NOx/hour when burning natural gas;
 - 0.19 lb of VOC/hour when burning natural gas;
 - 1.22 lbs of CO/hur when burning LPG;
 - 7.27 lbs of NOx/hour when burning LPG; and
 - 0.11 lb of VOC/hour when burning LPG.

Applicable Compliance Method:

The hourly CO, VOC, and NO_x emission rates listed above are based on this emissions unit's uncontrolled potential to emit from the drying hoods. The hourly emission rates were calculated by the following equations using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

For natural gas combustion:

E_{CO} = heat input capacity of 35 mmBtu/hour x 0.0823 lb of CO/mmBtu per AP-42 Table 1.4-1 for natural gas combustion;

E_{NOx} = heat input capacity of 35 mmBtu/hour x 0.098 lb of NO_x/mmBtu per AP-42 Table 1.4-1 for natural gas combustion;

E_{VOC} = heat input capacity of 35 mmBtu/hour x 0.00539 lb of VOC/mmBtu per AP-42 Table 1.4-2 for natural gas combustion; and

For LPG (propane) combustion:

E_{CO} = heat input capacity of 35 mmBtu/hour x 0.0349 lb of CO/mmBtu per AP-42 Table 1.5-1 for LPG combustion;

E_{NOx} = heat input capacity of 35 mmBtu/hour x 0.2076 lb of NO_x/mmBtu per AP-42 Table 1.5-1 for LPG combustion;

E_{VOC} = heat input capacity of 35 mmBtu/hour x 0.00328 lb of VOC/mmBtu per AP-42 Table 1.5-1 for LPG combustion

where E = Emission Rate_(Pollutant) (pounds per hour).

c. Emission Limitation:

CO emissions from the drying hoods shall not exceed 12.62 TPY when burning any combination of natural gas or LPG.

Applicable Compliance Method:

The annual CO emission rate is based on this emissions unit's uncontrolled potential to emit from the drying hoods when burning natural gas as worst case fuel. The annual CO emission rate was calculated by the following equations using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

For natural gas combustion:

E = heat input capacity of 35 mmBtu/hour x 0.0823 lb of CO/mmBtu per AP-42 Table 1.4-1 for natural gas combustion x 8760 hours/(2000)]; and

For LPG (propane) combustion:

$E = \text{heat input capacity of } 35 \text{ mmBtu/hour} \times 0.0349 \text{ lb of CO/mmBtu per AP-42 Table 1.5-1 for LPG combustion} \times 8760 \text{ hours}/(2000)$];

where $E = \text{Emission Rate (tons per year)}$.

d. Emission Limitation:

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

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).

e. Emission Limitations:

325 pounds per hour of VOC, from off-line wire and felt cleaning on emissions units P101 and P102, combined; and

39 TPY of VOC, from off-line wire and felt cleaning on emissions units P101 and P102, combined.

Applicable Compliance Method:

The hourly VOC emission rate is based on the combined emissions units' uncontrolled potential to emit for off-line wire and felt cleaning operations. The hourly VOC emission rate was calculated by the following equation using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

$E = \text{maximum solvent usage rate of } 50 \text{ gallons per hour} \times 6.5 \text{ lbs of VOC per gallon of solvent}$;

where $E = \text{Emission Rate (pounds per hour)}$.

Compliance with the annual VOC emissions limitation shall be determined by compliance with the VOC input restriction specified in c)(3) and the record keeping requirements specified in d)(3).

f. Emission Limitation:

21.98 TPY of VOC from emissions units P101 and P102, combined, excluding drying hoods and off-line wire/felt cleaning.

Applicable Compliance Method:

Compliance with the annual VOC emission limitation shall be determined by compliance with the MDTP operational restriction specified in c)(4), record

keeping requirements specified in d)(4), and the emission testing as specified in f)(2).

g. Emission Limitations:

The drying hoods on emissions units P101 and P102, combined, when burning any combination of natural gas or LPG, shall not exceed the following emission limitations based upon a rolling, 12-month summation:

1.07 TPY of PE;

2.59 TPY of PM10;

39.9 TPY of NOx; and

1.47 TPY of VOC.

Applicable Compliance Method:

Compliance with the PE, PM10, VOC, and NOx emission limitations specified above shall be determined by the record keeping requirements specified in d)(5).

h. Emission Limitation:

The uncontrolled potential to emit from the drying hoods on this emissions unit is less than 10.0 TPY for SO₂, PE and PM10.

Applicable Compliance Method:

The annual PE, PM10, SO₂ emission rates are based on this emissions unit's uncontrolled potential to emit from the drying hoods. The annual PE, PM10, SO₂ emission rates were calculated by the following equations using the information submitted by the permittee in PTI Application 14-05967, submitted on July 27, 2007:

For natural gas combustion:

$E_{PE} = \text{heat input capacity of } 35 \text{ mmBtu/hour} \times 0.0019 \text{ lb of PE/mmBtu per AP-42 Table 1.4-2 for natural gas combustion} \times 8760 \text{ hours}/(2000)];$

$E_{PM10} = \text{heat input capacity of } 35 \text{ mmBtu/hour} \times 0.0075 \text{ lb of PM10/mmBtu per AP-42 Table 1.4-2 for natural gas combustion} \times 8760 \text{ hours}/(2000)];$

$E_{SO2} = \text{heat input capacity of } 35 \text{ mmBtu/hour} \times 0.00058 \text{ lb of SO}_2\text{/mmBtu per AP-42 Table 1.4-2 for natural gas combustion} \times 8760 \text{ hours}/(2000)];$ and

For LPG (propane) combustion:

$E_{PE} = \text{heat input capacity of } 35 \text{ mmBtu/hour} \times 0.00656 \text{ lb of PE/mmBtu per AP-42 Table 1.5-1 for LPG combustion} \times 8760 \text{ hours}/(2000)];$

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E_{PM10} = heat input capacity of 35 mmBtu/hour x 0.0121lb of PM10/mmBtu per AP-42 Table 1.5-1 for natural gas combustion x 8760 hours/(2000)];

E_{SO2} = heat input capacity of 35 mmBtu/hour x 0.00019 lb of SO2/mmBtu per AP-42 Table 1.5-1 for LPG combustion, using a sulfur content of 0.18 gr/100ft³ x 8760 hours/(2000)];

where E = Emission Rate_(Pollutant) (tons per year).

i. Emission Limitation:

SO2 emissions shall not exceed 194.7 pounds per hour.

Applicable Compliance Method:

The hourly SO2 emissions rate is based on the equation in OAC rule 3745-18-06(E)(2) using a process weight rate of 16.3 MDTP per hour.

To determine the actual SO2 emission rate from this emissions unit, the following equations shall be used:

For natural gas combustion:

E = heat input capacity of 35 mmBtu/hour x 0.00058 lb of SO2/mmBtu per AP-42 Table 1.4-2 for natural gas combustion; and

For LPG (propane) combustion:

E = heat input capacity of 35 mmBtu/hour x 0.00019 lb of SO2/mmBtu per AP-42 Table 1.5-1 for LPG combustion, using a sulfur content of 0.18 gr/100ft³;

where E = Emission Rate (pounds per hour).

(2) Emission Testing Requirements:

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 3 months after startup of new emissions unit P107, or within 3 months after modification of existing emissions units P101 and P102, whichever is latest, as identified in this permit to install.
- b. The emission testing shall be conducted to confirm the emission factor of 0.2188 lb of VOC per machine dried tons paper (MDTP) provided by the permittee following stack testing conducted October 23-23, 2009, which is used to demonstrate compliance with the mass allowable VOC emission limitation for this emissions unit and the allowable annual VOC emission limitation contained in this permit to install for emissions units P101 and P102, combined.
- c. The following test method(s) shall be employed to demonstrate compliance with the VOC emission rate(s):



40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 25 or 25A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.

- d. The test shall be conducted while the emissions unit is operating at worst case emission rate conditions, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - 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). The test notification shall include a description of the process parameters identified as being worst case for the proposed emissions 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(s).
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall conduct an onsite pre-test meeting with personnel from the Hamilton County Department of Environmental Services to review the proposed test plan and emission unit operations.
 - g. 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.
 - 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 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) Compliance with the rolling 12-month VOC input restriction for off-line wire and felt cleaning operations specified in c)(3) shall be determined by the record keeping requirements specified in d)(3).

Compliance with the rolling 12-month MDTP processing rate restriction specified in c)(4) shall be determined by the record keeping requirements specified in d)(4).

g) Miscellaneous Requirements

- (1) The terms and conditions in this permit to install shall supercede the terms and conditions for emissions unit P101 contained in permit to install No. 14-05967, issued November 20, 2007.



This source is located in an area that was designated as non-attainment for Particulate Matter less than 2.5 microns (PM2.5) under the National Ambient Air Quality Standards (NAAQS) effective April 5, 2005. Regulations have not yet been promulgated to implement non-attainment new source review for PM2.5. In the absence of implementation regulations, the USEPA issued interim guidance on April 5, 2005, regarding how to address PM2.5 during new source review. For the purpose of this permit to install, pursuant to this USEPA guidance, PM10 was considered a surrogate for PM2.5. Since the PM10 emissions are less than the major modification threshold, the non-attainment new source review requirements do not apply for PM10 and PM2.5.



3. P103, Natural De-Inking Plant (BWP)

Operations, Property and/or Equipment Description:

Natural De-Inking - Modification

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(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 0.5 pound per hour from emissions unit P103 and 6.76 tons per year from emissions units P103, P104 and P107 combined. See b)(2)a and b)(2)b.
b.	OAC rule 3745-31-05(D) Voluntary Restriction to Avoid Non-Attainment New Source Review	See b)(2)c and c)(2).
c.	OAC rule 3745-21-07(G)	Exempt. See b)(2)d. and c)(1).

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations and usage limitations.

b. The short-term emission limitation outlined above is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with these limitations.

c. The maximum total annual emissions from emissions units P103, P104 and P107, combined, shall not exceed the following emission limitation based upon a rolling, 12-month summation:

6.76 TPY of VOC.

- d. 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).

c) Operational Restrictions

- (1) This emissions unit currently does not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).
- (2) The maximum annual processing rate for emissions units P103, P104, and P107, combined, shall not exceed 300,000 tons per year of waste paper (does not include virgin pulp), based upon a rolling, 12-month summation of machine dried tons input(MDTI).

The permittee has existing records to demonstrate compliance upon issuance of this permit, therefore first year MDTI amounts are not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P103, P104, and P107, combined:
- a. the total amount of machine dried tons of input (MDTI), in tons per month;
- b. the updated rolling, 12-month summation of MDTI, in tons (the total amount of tons for the current month plus the total amount of tons for the previous eleven calendar months);
- c. the total emissions, in tons, of VOC calculated by taking the monthly MDTI value from term d)(1)a. above and multiplying by the emissions factor of 0.035 lb of VOC/MDTI, established during the most recent emissions test for these emissions units, then dividing by 2000; and
- d. the updated rolling, 12-month summation emissions total, in tons, of VOC (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).

e) Reporting Requirements

- (1) The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s)

and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

- (2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
- a. an identification of all exceedances of the rolling, 12-month MDTI operational restriction for emissions units P103, P104, and P107, combined, as specified in c)(2); and
 - b. an identification of all exceedances of the rolling, 12-month emissions limitation for VOC for emissions units P103, P104, and P107, combined, as specified in b)(2)c.

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

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) and b)(2)c. of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 0.5 pound per hour from emissions unit P103.

Applicable Compliance Method:

The hourly VOC emissions rate is based on this emissions unit's uncontrolled potential to emit. The hourly VOC emissions rate was calculated by the following equation using the information and emission test data submitted by the permittee following a stack test conducted 10/20/2009:

$$E = \text{machine dried recycled input rate of 12.3 tons/hour} \times 0.035 \text{ lb of VOC/MDTI per 2009 emission test data from de-inking operations} \times 1.15 \text{ (15\% above tested VOC/MDTI rate to allow for testing variables);}$$

where E = Emission Rate (pound per hour).
 - b. Emission Limitation:

6.76 TPY of VOC, for emissions units P103, P104, and P107, combined, based upon a rolling, 12-month summation.



Applicable Compliance Method:

Compliance with the VOC emission limitation specified above shall be determined by the record keeping requirements specified in d)(1) and the emission testing conducted 10/20/2009.

Emission Testing Requirements

If required the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The following test method(s) shall be employed to demonstrate compliance with the VOC emission rate(s):

40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 25 or 25A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.

The test shall be conducted while the emissions unit is operating at worst case emission rate conditions, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

- (2) Compliance with the rolling 12-month MDTI processing rate restriction specified in c)(2) shall be determined by the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions in this permit to install shall supersede the terms and conditions for emissions unit P103 contained in permit to install No. 14-05967, issued November 20, 2007.



4. P104, Bleach De-Inking Plant (BWP)

Operations, Property and/or Equipment Description:

Bleach De-Inking - Modification

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(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 0.99 pound per hour from emissions unit P103 and 6.76 tons per year from emissions units P103, P104 and P107 combined. See b)(2)a and b)(2)b.
b.	OAC rule 3745-31-05(D) Voluntary Restriction to Avoid Non-Attainment New Source Review	See b)(2)c and c)(2).
c.	OAC rule 3745-21-07(G)	Exempt. See b)(2)d. and c)(1).

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations and usage limitations.

b. The short-term emission limitation outlined above is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with these limitations.

c. The maximum total annual emissions from emissions units P103, P104 and P107, combined, shall not exceed the following emission limitation based upon a rolling, 12-month summation:

6.76 TPY of VOC.

- d. 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).

c) Operational Restrictions

- (1) This emissions unit currently does not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).
- (2) The maximum annual processing rate for emissions units P103, P104, and P107, combined, shall not exceed 300,000 tons per year of waste paper (does not include virgin pulp), based upon a rolling, 12-month summation of machine dried tons input(MDTI).

The permittee has existing records to demonstrate compliance upon issuance of this permit, therefore first year MDTI amounts are not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P103, P104, and P107, combined:
- a. the total amount of machine dried tons of input (MDTI), in tons per month;
- b. the updated rolling, 12-month summation of MDTI, in tons (the total amount of tons for the current month plus the total amount of tons for the previous eleven calendar months);
- c. the total emissions, in tons, of VOC calculated by taking the monthly MDTI value from term d)(1)a. above and multiplying by the emissions factor of 0.035 lb of VOC/MDTI, established during the most recent emissions test for these emissions units, then dividing by 2000; and
- d. the updated rolling, 12-month summation emissions total, in tons, of VOC (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).

e) Reporting Requirements

- (1) The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the

estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

- (2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. an identification of all exceedances of the rolling, 12-month MDTI operational restriction for emissions units P103, P104, and P107, combined, as specified in c)(2); and
 - b. an identification of all exceedances of the rolling, 12-month emissions limitation for VOC for emissions units P103, P104, and P107, combined, as specified in b)(2)c.

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

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) and b)(2)c. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 0.99 pound per hour from emissions unit P104.

Applicable Compliance Method:

The hourly VOC emissions rate is based on this emissions unit's uncontrolled potential to emit. The hourly VOC emissions rate was calculated by the following equation using the information and emission test data submitted by the permittee following a stack test conducted 10/20/2009:

$E = \text{machine dried recycled input rate of } 24.7 \text{ tons/hour} \times 0.035 \text{ lb of VOC/MDTI per } 2009 \text{ emission test data from de-inking operations} \times 1.15 \text{ (} 15\% \text{ above tested VOC/MDTI rate to allow for testing variables)}$;

where E = Emission Rate (pound per hour).
 - b. Emission Limitation:

6.76 TPY of VOC, for emissions units P103, P104, and P107, combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the VOC emission limitation specified above shall be determined by the record keeping requirements specified in d)(1) and the emission testing conducted 10/20/2009.

If required the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The following test method(s) shall be employed to demonstrate compliance with the VOC emission rate(s):

40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 25 or 25A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.

The test shall be conducted while the emissions unit is operating at worst case emission rate conditions, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

- (2) Compliance with the rolling 12-month MDTI processing rate restriction specified in c)(2) shall be determined by the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions in this permit to install shall supersede the terms and conditions for emissions unit P104 contained in permit to install No. 14-05967, issued November 20, 2007.



5. P107, Broke System (BWP)

Operations, Property and/or Equipment Description:

Broke System

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(A)(3)	Volatile organic compound (VOC) emissions shall not exceed 0.03 pound per hour from emissions unit P107 and 6.76 tons per year from emissions units P103, P104 and P107 combined. See b)(2)a and b)(2)b.
b.	OAC rule 3745-31-05(D) Voluntary Restriction to Avoid Non-Attainment New Source Review	See b)(2)c and c)(2).
c.	OAC rule 3745-21-07(G)	Exempt. See b)(2)d. and c)(1).

(2) Additional Terms and Conditions

a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by compliance with the emission limitations and usage limitations.

b. The short-term emission limitation outlined above is based upon the emissions unit's Potential to Emit (PTE). Therefore, no daily records are required to demonstrate compliance with these limitations.

c. The maximum total annual emissions from emissions units P103, P104 and P107, combined, shall not exceed the following emission limitation based upon a rolling, 12-month summation:

6.76 TPY of VOC.

Effective Date: To be entered upon final issuance

- d. 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).

c) Operational Restrictions

- (1) This emissions unit currently does not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).
- (2) The maximum annual processing rate for emissions units P103, P104, and P107, combined, shall not exceed 300,000 tons per year of waste paper (does not include virgin pulp), based upon a rolling, 12-month summation of machine dried tons input(MDTI).

The permittee has existing records to demonstrate compliance upon issuance of this permit, therefore first year MDTI amounts are not necessary.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall collect and record the following information each month for emissions units P103, P104, and P107, combined:
- a. the total amount of machine dried tons of input (MDTI), in tons per month;
- b. the updated rolling, 12-month summation of MDTI, in tons (the total amount of tons for the current month plus the total amount of tons for the previous eleven calendar months);
- c. the total emissions, in tons, of VOC calculated by taking the monthly MDTI value from term d)(1)a. above and multiplying by the emissions factor of 0.0042 lb of VOC/MDTI, established during the most recent emissions test for these emissions units, then dividing by 2000; and
- d. the updated rolling, 12-month summation emissions total, in tons, of VOC (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).

e) Reporting Requirements

- (1) The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material [as defined in OAC rule 3745-21-01(C)(5)] was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the

estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.

- (2) The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:
 - a. an identification of all exceedances of the rolling, 12-month MDTI operational restriction for emissions units P103, P104, and P107, combined, as specified in c)(2); and
 - b. an identification of all exceedances of the rolling, 12-month emission limitation for VOC for emissions units P103, P104, and P107, combined, as specified in b)(2)c.

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

f) Testing Requirements

- (1) Compliance with the emission limitations in b)(1) and b)(2)c. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Volatile organic compound (VOC) emissions shall not exceed 0.03 pound per hour from emissions unit P107.

Applicable Compliance Method:

The hourly VOC emission rate is based on this emissions unit's uncontrolled potential to emit. The hourly VOC emission rate was calculated by the following equation using the information and emission test data submitted by the permittee following a stack test conducted 10/20/2009:

$E = \text{machine dried recycled input rate of } 6.8 \text{ tons/hour} \times 0.0042 \text{ lb of VOC/MDTI per } 2009 \text{ emission test data from de-inking operations} \times 1.15 \text{ (} 15\% \text{ above tested VOC/MDTI rate to allow for testing variables);}$

where E = Emission Rate (pound per hour).
 - b. Emission Limitation:

6.76 TPY of VOC, for emissions units P103, P104, and P107, combined, based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the VOC emission limitation specified above shall be determined by the record keeping requirements specified in d)(1) and the emission testing conducted 10/20/2009.

If required the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The following test method(s) shall be employed to demonstrate compliance with the VOC emission rate(s):

40 CFR Part 60, Appendix A, Methods 1 through 4, and Method 25 or 25A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services.

The test shall be conducted while the emissions unit is operating at worst case emission rate conditions, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

- (2) Compliance with the rolling 12-month MDTI processing rate restriction specified in c)(2) shall be determined by the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

- (1) The terms and conditions in this permit to install shall supersede the terms and conditions for emissions unit P107 contained in permit to install No. 14-05967, issued November 20, 2007.