



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

01/09/02

**CERTIFIED MAIL**

**RE: Final Title V Chapter 3745-77 permit**

14-09-01-0021  
Jefferson Smurfit Corporation (U.S.) - Boxboard Divisio  
Todd W. Butt  
407 Charles Street  
Middletown, OH 45042

Dear Todd W. Butt:

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

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

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

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

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

Very truly yours,

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

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



State of Ohio Environmental Protection Agency

**FINAL TITLE V PERMIT**

Issue Date: <b>01/09/02</b>	Effective Date: <b>01/09/02</b>	Expiration Date: <b>01/09/07</b>
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This document constitutes issuance of a Title V permit for Facility ID: 14-09-01-0021 to:  
 Jefferson Smurfit Corporation (U.S.) - Boxboard Divisio  
 407 Charles Street  
 Middletown, OH 45042

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

B003 (Boiler 205) Boiler #205, Rated heat input capacity 170 MMBtu/hr, capable of firing either coal or No. 2 fuel oil	B005 (Boiler - B005) Boiler B005, Rated heat input capacity 72 MMBtu/hr, capable of firing either natural gas or No. 2 fuel oil	P002 (Paper Machine) Paper machine for the production of paperboard
B004 (Boiler 315) Boiler #315, Rated heat input capacity 28 MMBtu/hr, capable of firing either No. 2 fuel oil or natural gas	B006 (Boiler B006) Boiler B006, Rated heat input capacity 72 MMBtu/hr, capable of firing either natural gas or No. 2 fuel oil	

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

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

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones  
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Section

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
  - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to

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

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

## **2. Scheduled Maintenance/Malfunction Reporting**

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

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

## **3. Risk Management Plans**

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

## **4. Title IV Provisions**

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

## **5. Severability Clause**

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

## 6. General Requirements

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

## 7. Fees

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

## 8. Marketable Permit Programs

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

## 9. Reasonably Anticipated Operating Scenarios

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

## 10. Reopening for Cause

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

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

## 11. Federal and State Enforceability

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

## 12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

### 13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but

excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

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

#### **14. Operational Flexibility**

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

#### **15. Emergencies**

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

#### **16. Off Permit Changes**

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

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or

pollutants emitted, and any federally applicable requirement that would apply as a result of the change;

- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

## **17. Compliance Method Requirements**

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

## **18. Insignificant Activity**

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

## **B. State Only Enforceable Section**

### **1. Permit to Install Requirement**

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

### **2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **3. Records Retention Requirements**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

### **4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with

this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**6. Permit Transfers**

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

**7. 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.

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

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

## **Part II - Specific Facility Terms and Conditions**

### **A. State and Federally Enforceable Section**

**None**

### **B. State Only Enforceable Section**

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

F001 plant roadways and parking areas;  
F002 coal and ash handling;  
F003 coal pile;  
Z001 infrared dryers;  
Z002 material makedown 1;  
Z003 material makedown 2;  
Z004 oil storage tank;  
Z005 maintenance welding;  
Z006 emergency diesel fired sump pump;  
Z007 core cutters;  
Z008 sheeter/slitters;  
Z009 skid making; and  
Z010 parts washing.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Boiler 205 (B003)

**Activity Description:** Boiler #205, Rated heat input capacity 170 MMBtu/hr, capable of firing either coal or No. 2 fuel oil

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
170 MMBtu/hr coal/distillate oil-fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) boiler with ESP - boiler #205	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-10(C)(1)	0.17 lb PE/MMBtu of actual heat input
	40 CFR 52.1881(b)(12)	1.40 lbs SO <sub>2</sub> /MMBtu of actual heat input

##### 2. Additional Terms and Conditions

- 2.a The emissions from B003, B005, and B006 combined shall not exceed:
  - i. 660.8 tons of SO<sub>2</sub> per year as a rolling, 12-month summation;
  - ii. 466.2 tons of NO<sub>x</sub> per year as a rolling, 12-month summation; and
  - iii. 109.9 tons of CO per year as a rolling, 12-month summation.
- 2.b The permittee shall not operate emissions unit B003 in combination with emissions unit B005 and/or B006 except for periods of startup or shutdown which shall not exceed 200 hours (or 12,000 minutes) per calendar year

##### II. Operational Restrictions

1. The quality of the coal received for burning in this emissions unit shall have a combination of sulfur content and heat content on an "as-received" wet basis that is sufficient to comply with the allowable sulfur dioxide (SO<sub>2</sub>) emission limitation of 1.40 lbs SO<sub>2</sub>/MMBtu of actual heat input.
2. The quality of the oil received for burning in this emissions unit shall have a combination of sulfur content and heat content that is sufficient to comply with the allowable SO<sub>2</sub> emission limitation of 1.40 lbs SO<sub>2</sub>/MMBtu of actual heat input.
3. The permittee shall operate the ESP during any operation of this emissions unit when burning coal, except during periods of start-up and shutdown that are exempted pursuant to OAC rules 3745-17-07(A)(3)(a)(i) and 3745-17-07(A)(3)(b)(i), or during malfunctions that are exempted pursuant to OAC rule 3745-17-07(A)(3)(c).

### III. Monitoring and/or Record Keeping Requirements

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

Each monthly composite sample of coal shall be analyzed for sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for sulfur content and heat content shall be: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isothermal Bomb Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

2. The permittee shall maintain monthly records of the total quantity of coal received, the results of the analyses for sulfur content and heat content, and the calculated average SO<sub>2</sub> emission rate for the month, in lbs/MMBtu of actual heat input. The SO<sub>2</sub> emission rate shall be calculated using the equation specified in OAC rule 3745-18-04.
3. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content, and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Hamilton County Department of Environmental Services.
4. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO<sub>2</sub> emission rate in lbs/MMBtu of actual heat input. The SO<sub>2</sub> emission rate shall be calculated using the equation specified in OAC rule 3745-18-04.
5. The permittee shall operate and maintain a temperature monitor and recorder that measures and records the temperature of the boiler exhaust gases entering the ESP during:
  - a. all periods of start-up until the ESP is operational or until the inlet temperature of the ESP achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i); and
  - b. all periods of shutdown until the inlet temperature of the ESP drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i).

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

6. The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The continuous emission monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

7. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

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

8. The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.
9. The permittee shall collect and record the following information on a monthly basis:
  - a. the total amount of natural gas burned in B003, B004, and B005, combined, in MM cubic feet;
  - b. the total rolling, 12-month summation of the amounts of natural gas burned in B003, B004, and B005, combined, in MM cubic feet;
  - c. the total amount of distillate oil burned in B003, B004, and B005, combined, in gallons; and
  - d. the total rolling, 12-month summation of the amounts of distillate oil burned in B003, B004, and B005, combined, in gallons.
10. The permittee shall maintain monthly records of the total calculated emissions of SO<sub>2</sub>, NO<sub>x</sub>, and CO from B003, B004, and B005, combined, as rolling, 12-month summations. The calculations shall be based on the fuel usage information in A.III.9 and the equations/stack testing results specified in A.V.

### IV. Reporting Requirements

1. Quarterly reports shall be submitted concerning the quantity and quality of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
  - a. the total quantity of coal received (tons);
  - b. the average sulfur content (percent by weight) of the coal received;
  - c. the average heat content (Btu/pound) of the coal received; and
  - d. the calculated average SO<sub>2</sub> emissions rate (lbs SO<sub>2</sub>/MMBtu of actual heat input) for the coal received.
2. The permittee shall submit, on a quarterly basis, copies or summaries of the permittee's or oil supplier's analyses for each shipment of oil that is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies or summaries of the permittee's or oil supplier's analyses:
  - a. the total quantity of oil received in each shipment of oil (gallons); and
  - b. the calculated sulfur dioxide emission rate (pounds/mmBtu) for each shipment of oil.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during start-up and shutdown of the emissions unit when the ESP was not in operation and the temperature of the boiler exhaust gases exceeded the temperature levels specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b)(i).

The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

#### **IV. Reporting Requirements (continued)**

4. Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter.

5. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing an exceedance of the rolling, 12-month emission limitations in section A.I.2.a.

The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

**Emission Limitation:**

Visible particulate emissions (PE) from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

**Applicable Compliance Method:**

Compliance shall be determined by the data collected and recorded in section A.III.8 for the COM and, if required, through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

## V. Testing Requirements (continued)

2. Emission Limitation:  
0.17 lb PE/MMBtu of actual heat input

Applicable Compliance Method:

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 initial permit issuance, approximately 2.5 years after permit issuance, and within 6 months prior to permit expiration. If the emissions unit has not operated since the most recent emissions test, then an emissions test is not required and the permittee is required to inform the Director (the appropriate Ohio EPA District Office or local air agency) in writing prior to the date the emissions testing was required.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of 0.17 lb PE/MMBtu of actual heat input, when burning coal.

c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate:

40 CFR Part 60, Appendix A, Method 5.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Director (the appropriate Ohio EPA District Office or local air agency).

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test, and the person(s) who will be conducting the test. Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

3. Emission Limitation:  
1.40 lbs SO<sub>2</sub>/MMBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated based on the record keeping requirements specified in sections A.III.1 through A.III.4 of this permit.

If testing is required to demonstrate compliance with the allowable emission limit of 1.40 lbs SO<sub>2</sub>/MMBtu of actual heat input, testing shall be conducted in accordance with 40 CFR Part 60, Appendix A, Method 6.

## V. Testing Requirements (continued)

4. Emission Limitations:  
660.8 tons of SO<sub>2</sub> per year as a rolling, 12-month summation;  
466.2 tons of NO<sub>x</sub> per year as a rolling, 12-month summation; and  
109.9 tons of CO per year as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be determined as the sum of the individual pollutant emissions from the combustion of distillate oil and coal as provided below:

- a. For SO<sub>2</sub> from distillate oil:

(the average SO<sub>2</sub> emission rate, for the 12-month period, in lb/MMBtu, from section A.III.4) X (the average of the heat content data for the distillate oil for the 12-month period, from section A.III.4, in MMBtu/gallon) X (the updated rolling 12-month distillate oil usage, in gallons, from section A.III.9.b)/2000

- b. For NO<sub>x</sub> and CO from distillate oil:

(AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor, in lbs/gallon) X (the updated rolling 12-month distillate oil usage, in gallons, from section A.III.9.b)/2000

- c. For SO<sub>2</sub> from coal:

(the average SO<sub>2</sub> emission rate, for the 12-month period, in lb/MMBtu, from section A.III.2) X (the average of the heat content data for the coal for the 12-month period, from section A.III.2, in MMBtu/lb of coal) X (the updated rolling 12-month coal usage, in tons, from section A.III.9.d)/2000

- d. For NO<sub>x</sub> and CO from coal:

(AP-42, Fifth Edition, Section 1.1, Table 1.1-3 (revised 9/98) emission factor, in lbs/ton coal) X (the updated rolling 12-month coal usage, in tons, from section A.III.9.d)/2000

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
170 MMBtu/hr coal/distillate oil-fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) boiler with ESP - boiler #205	OAC rule 3745-18-15(E)	1.6 lbs SO <sub>2</sub> /MMBtu of actual heat input (This emission limit is less stringent than the limit in 40 CFR Part 52.1881(b)(12)).

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

1. The minimum stack height for this emissions unit shall be 120 feet above ground level.

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Boiler 315 (B004)

**Activity Description:** Boiler #315, Rated heat input capacity 28 MMBtu/hr, capable of firing either No. 2 fuel oil or natural gas

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
28 MMBtu/hr natural gas/distillate oil-fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) boiler	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
	40 CFR 52.1881(b)(12)	1.40 lbs SO <sub>2</sub> /MMBtu of actual heat input
	OAC rule 3745-17-10(B)(1)	.020 lb PE/MMBtu of actual heat input

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The quality of the oil received for burning in this emissions unit shall have a combination of sulfur content and heat content that is sufficient to comply with the allowable SO<sub>2</sub> emission limitation of 1.40 lbs SO<sub>2</sub>/MMBtu of actual heat input.
- The permittee shall burn only natural gas and/or distillate fuel oil in this emissions unit.

##### III. Monitoring and/or Record Keeping Requirements

- The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.
- For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (lbs/MMBtu).
- For each day during which the permittee burns a fuel other than natural gas and/or distillate fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

#### IV. Reporting Requirements

1. The permittee shall submit, on a quarterly basis, copies or summaries of the permittee's or oil supplier's analyses for each shipment of oil that is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies or summaries of the permittee's or oil supplier's analyses:
  - a. the total quantity of oil received in each shipment of oil (gallons); and
  - b. the calculated sulfur dioxide emission rate (pounds/mmBtu) for each shipment of oil.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or distillate fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

#### V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

Visible particulate emissions (PE) from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

2. Emission Limitation:  
.020 LB PE/MMBtu of actual heat input

Applicable Compliance Method:

When firing natural gas, compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (ft<sup>3</sup>/hr) by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-2 (7/98) for filterable particulates in natural gas combustion (1.9 lbs of particulates/mmft<sup>3</sup>), and dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

When firing distillate oil, compliance with this emission limitation may be demonstrated by multiplying the maximum fuel oil burning capacity of the emissions unit (gal/hr) by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.3-1 (9/98) for filterable particulates in number two fuel oil combustion (2 lbs of particulates/1000 gal), and dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

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

3. Emission Limitation:  
1.40 lbs SO<sub>2</sub>/MMBtu of actual heat input

Applicable Compliance Method:

Compliance may be demonstrated based on the record keeping requirements specified in sections A.III.1 through A.III.4 of this permit.

If testing is required to demonstrate compliance with the allowable emission limit of 1.40 lbs SO<sub>2</sub>/MMBtu of actual heat input, testing shall be conducted in accordance with 40 CFR Part 60, Appendix A, Method 6.

#### VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
28 MMBtu/hr natural gas/distillate oil-fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) boiler	OAC rule 3745-31-05(A)(3) (PTI 14-1440)	0.31 lb SO <sub>2</sub> /MMBtu of actual heat input (This emission limit is more stringent than the limit in 40 CFR Part 52.1881(b)(12).)
		0.14 lb NO <sub>x</sub> /MMBtu of actual heat input*
	OAC rule 3745-18-06	*This lb/MMBtu emission limit is based on the emissions unit's potential to emit. Therefore, no short term record keeping, deviation reporting or compliance method calculations are required to demonstrate compliance with this limit.  See section B.I.2.  The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**2. Additional Terms and Conditions**

- 2.a The following tons per year (TPY) emission limitations shall not be exceeded:

- i. 1.79 TPY PE\*;
- ii. 37.86 TPY SO<sub>2</sub>\*;
- iii. 17.77 TPY NO<sub>x</sub>\*;
- iv. 4.44 TPY CO\*;
- v. 0.18 TPY VOC\*.

\*This TPY emission limit is based on the emissions unit's potential to emit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limit.

**II. Operational Restrictions**

1. The sulfur content of the distillate fuel oil used in this emissions unit shall not exceed 0.3% by weight.

**III. Monitoring and/or Record Keeping Requirements**

None

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the lb SO<sub>2</sub>/MMBtu emission limitation in B.I.1 of this permit (based upon each shipment of oil received for burning).
2. The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the sulfur content restriction in section B.II.1 of this permit (based upon each shipment of oil received for burning).
3. The quarterly deviation reports shall be submitted in accordance with General Term and Condition B.1 of this permit.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section B.I.1 of these terms and conditions shall be determined in accordance with the following methods:

Emission Limitation:

0.31 lb SO<sub>2</sub>/MMBtu of actual heat input

Applicable Compliance Method:

Compliance with the sulfur content and sulfur dioxide emission limitations shall be based upon the record keeping in sections A.III.1 and 2 of this permit. Compliance shall be demonstrated by documenting that each shipment of oil meets the limitations.

2. If required, the following test methods shall be performed to demonstrate compliance with the emission limitations specified in section B.I.1:

40 CFR Part 60, Appendix A, Method 6 for SO<sub>2</sub>; and

40 CFR Part 60, Appendix A, Method 7 for NO<sub>x</sub>.

#### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Boiler - B005 (B005)

**Activity Description:** Boiler B005, Rated heat input capacity 72 MMBtu/hr, capable of firing either natural gas or No. 2 fuel oil

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
72 MMBtu/hr natural gas/distillate oil-fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) boiler No. 1	40 CFR Part 60 Subpart Dc	Visible particulate emissions (PE) shall not exceed 20 percent opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.
	OAC rule 3745-31-05(D) (PTI 14-4175)	0.31 lb SO <sub>2</sub> /MMBtu 97.76 TPY SO <sub>2</sub> *
		0.16 lb CO/MMBtu 50.46 TPY CO*
		0.10 lb NO <sub>x</sub> /MMBtu when burning only natural gas 0.18 lb NO <sub>x</sub> /MMBtu when burning distillate oil 56.76 TPY NO <sub>x</sub> *
		*The indicated TPY emission limitations are based on the emissions unit's potentials to emit. Therefore, no separate monitoring, record keeping, or reporting of the fuel usages for B005 is required. See Terms A.I.2.a and A.II.1.
	OAC rule 3745-17-07(A)(1)	The visible emission limitation specified in OAC rule 3745-17-07(A) is less stringent than that established in 40 CFR Part 60 Subpart Dc.
	OAC rule 3745-17-10(B)(1)	.020 lb PE/MMBtu
	OAC rules 3745-21-08(B) and 3745-23-06(B)	None, see A.I.2.b.

## 2. Additional Terms and Conditions

**2.a** The emissions from B003, B005, and B006 combined shall not exceed:

- i. 660.8 tons of SO<sub>2</sub> per year as a rolling, 12-month summation;
- ii. 466.2 tons of NO<sub>x</sub> per year as a rolling, 12-month summation; and
- iii. 109.9 tons of CO per year as a rolling, 12-month summation.

**2.b** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively, by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(D) in Permit to Install 14-4175.

## II. Operational Restrictions

1. The permittee shall not operate emissions unit B003 in combination with emissions unit B005 and/or B006 except for periods of startup or shutdown which shall not exceed 200 hours (or 12,000 minutes) per calendar year.
2. The permittee shall burn only natural gas and/or distillate fuel oil in this emissions unit.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the startup and shutdown time for emissions units B003, B005, and B006, for each day when emissions unit B005 and/or emissions unit B006 run(s) in combination with emissions unit B003.
2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content, and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Hamilton County Department of Environmental Services.

For each shipment of oil received for burning in this emissions unit the permittee shall maintain records of the name of the oil supplier, the total quantity of oil received, the results of the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO<sub>2</sub> emission rate in lbs/MMBtu (this calculation shall be performed using the equation specified in OAC rule 3745-18-04(F)).

3. The permittee shall collect and record the following information on a monthly basis:
  - a. the total amount of natural gas burned in B003, B004, and B005, combined, in MM cubic feet;
  - b. the total rolling, 12-month summation of the amounts of natural gas burned in B003, B004, and B005, combined, in MM cubic feet;
  - c. the total amount of distillate oil burned in B003, B004, and B005, combined, in gallons; and
  - d. the total rolling, 12-month summation of the amounts of distillate oil burned in B003, B004, and B005, combined, in gallons.
4. The permittee shall maintain monthly records of the total calculated emissions of SO<sub>2</sub>, NO<sub>x</sub>, and CO from B003, B004, and B005, combined, as rolling, 12-month summations. The calculations shall be based on the fuel usage information in A.III.3 and the equations/stack testing results specified in A.V.
5. For each day during which the permittee burns a fuel other than natural gas and/or distillate fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

## IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the operational restriction identified in A.II.1.

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing an exceedance of the rolling, 12-month emission limitations in section A.I.2.a.
3. The permittee shall submit, on a quarterly basis, copies or summaries of the permittee's or oil supplier's analyses for each shipment of oil that is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies or summaries of the permittee's or oil supplier's analyses:
  - a. the total quantity of oil received in each shipment of oil (gallons); and
  - b. the calculated sulfur dioxide emission rate (pounds/MMBtu) for each shipment of oil.
4. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or distillate fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
5. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

#### **V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

Visible particulate emissions (PE) shall not exceed 20 percent opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

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

Applicable compliance method when burning only natural gas-

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (MM cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs filterable PE/MM cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Applicable compliance method when burning #2 fuel oil-

For the use of no. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

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

## V. Testing Requirements (continued)

3. Emission Limitations -  
0.31 lb of SO<sub>2</sub>/MMBtu of actual heat

97.76 TPY of SO<sub>2</sub>

Applicable compliance method when burning #2 fuel oil-

Compliance with the allowable, lb/MMBtu, sulfur dioxide emission limitation shall be based upon the calculated sulfur dioxide emission rate for each shipment of oil received for burning.

Applicable compliance method when burning natural gas-

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (MM cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 0.6 lb SO<sub>2</sub>/MM cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Compliance with the annual SO<sub>2</sub> emission limitation of 97.76 TPY shall be assumed as long as compliance with the lb/MMBtu limitation is maintained (the individual TPY limit was based on the emissions unit's potential to emit).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations in accordance with USEPA reference Method 6, Method 6A, Method 6B, or Method 6c, whichever is appropriate, of 40 CFR, Part 60, Appendix A.

4. 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 approximately 2.5 years after permit issuance.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable lb/MMBtu emission rates for NO<sub>x</sub> and CO when burning natural gas.
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for NO<sub>x</sub>, Method 7E of 40 CFR Part 60, Appendix A and for CO, Method 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Director (the appropriate Ohio EPA District Office or local air agency).
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the the Director (the appropriate Ohio EPA District Office or local air agency).

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the appropriate Ohio EPA District Office or local air agency). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Director's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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 Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Director (the appropriate Ohio EPA District Office or local air agency).

## V. Testing Requirements (continued)

5. Compliance with the emission limitations of 56.76 TPY NO<sub>x</sub>, 50.46 TPY CO, and 97.76 TPY SO<sub>2</sub> shall be assumed as long as compliance with the lb/MMBtu limitations are maintained (the individual TPY limitations were established based on the emissions unit's potentials to emit).
6. Emission Limitations:  
660.8 tons of SO<sub>2</sub> per year as a rolling, 12-month summation;  
466.2 tons of NO<sub>x</sub> per year as a rolling, 12-month summation; and  
109.9 tons of CO per year as a rolling, 12-month summation.

### Applicable Compliance Method:

Compliance shall be determined as the sum of the individual pollutant emissions from the combustion of distillate oil and natural gas as provided below:

- a. For SO<sub>2</sub> from distillate oil:

(the average SO<sub>2</sub> emission rate, for the 12-month period, in lb/MMBtu, from section A.III.2) X (the average of the heat content data for the distillate oil for the 12-month period, from section A.III.2, in MMBtu/gallon) X (the updated rolling 12-month distillate oil usage, in gallons, from section A.III.3.d.)/2000

- b. For SO<sub>2</sub> from natural gas:

(emission Factor from AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) of 0.6 lb SO<sub>2</sub>/MM cubic feet) X (the updated rolling 12-month natural gas usage, in MM cubic feet, from section A.III.3.b.)/2000

- c. For NO<sub>x</sub> and CO from natural gas:

(emission factor from the most recent stack test that demonstrated the emissions unit to be in compliance, in lbs/MM cubic feet) X (the updated rolling 12-month natural gas usage, in MM cubic feet, from section A.III.3.b.)/2000

- d. For NO<sub>x</sub> and CO from distillate oil:

(AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor, in lbs/gallon) X (the updated rolling 12-month distillate oil usage, in gallons, from section A.III.3.d.)/2000

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
72 MMBtu/hr natural gas/distillate oil-fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) boiler No. 1	OAC rule 3745-31-05(A)(3) (PTI 14-4175)	0.016 lb VOC/MMBtu when burning only natural gas* 0.025 lb VOC/MMBtu when burning distillate oil* 6.3 TPY PE* 7.9 TPY VOC*
		The lb/MMBtu and TPY emission limitations are based on the emissions unit's potentials to emit. Therefore no recordkeeping or reporting requirements are necessary to demonstrate compliance.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

- Compliance with the annual emission limitation for VOC may be demonstrated by multiplying the manufacturer's emission factor of 0.025 lb VOC/MMBtu (worst case for oil) of actual heat input, by the maximum heat input capacity of the boiler (72 MMBtu/hr), by 8760 hours per year, and dividing by 2000 pounds per ton.

If testing is required to demonstrate compliance with the allowable lb VOC/MMBtu emission limitation, testing shall be conducted in accordance with 40 CFR Part 60, Appendix A, Method 18, 25, or 25A as appropriate.

**V. Testing Requirements (continued)**

2. Compliance with the annual emission limitation for PE may be demonstrated by multiplying the manufacturer's emission factor of 0.020 lb PE/MMBtu of actual heat input by the maximum heat input capacity of the boiler (72 MMBTU/hr), by 8760 hours per year, and dividing by 2000 pounds per ton.

If testing is required to demonstrate compliance with the allowable lb PE/ MMBtu emission limitation, testing shall be conducted in accordance with 40 CFR Part 60, Appendix A, Method 5.

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Boiler B006 (B006)

**Activity Description:** Boiler B006, Rated heat input capacity 72 MMBtu/hr, capable of firing either natural gas or No. 2 fuel oil

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
72 MMBtu/hr natural gas/distillate oil-fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) boiler No. 1	40 CFR Part 60 Subpart Dc	Visible particulate emissions (PE) shall not exceed 20 percent opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.
	OAC rule 3745-31-05(D) (PTI 14-4175)	0.31 lb SO <sub>2</sub> /MMBtu 97.76 TPY SO <sub>2</sub> *
		0.16 lb CO/MMBtu 50.46 TPY CO*
		0.10 lb NO <sub>x</sub> /MMBtu when burning only natural gas 0.18 lb NO <sub>x</sub> /MMBtu when burning distillate oil 56.76 TPY NO <sub>x</sub> *
		*The individual TPY emission limitations are based on the emissions unit's potentials to emit. Therefore, no monitoring and record keeping for the boiler's individual fuel usage is required.
	OAC rule 3745-17-07(A)(1)	See Terms A.I.2.a and A.II.1 The visible emission limitation specified in OAC rule 3745-17-07(A) is less stringent than that established in 40 CFR Part 60 Subpart Dc.
	OAC rule 3745-17-10(B)(1)	.020 lb PE/MMBtu
	OAC rules 3745-21-08(B) and 3745-23-06(B)	None, see A.I.2.b.

## 2. Additional Terms and Conditions

**2.a** The emissions from B003, B005, and B006 combined shall not exceed:

- i. 660.8 tons of SO<sub>2</sub> per year as a rolling, 12-month summation;
- ii. 466.2 tons of NO<sub>x</sub> per year as a rolling, 12-month summation; and
- iii. 109.9 tons of CO per year as a rolling, 12-month summation.

**2.b** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively, by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(D) in Permit to Install 14-4175.

## II. Operational Restrictions

1. The permittee shall not operate emissions unit B003 in combination with emissions unit B005 and/or B006 except for periods of startup or shutdown which shall not exceed 200 hours (or 12,000 minutes) per calendar year.
2. The permittee shall burn only natural gas and/or distillate fuel oil in this emissions unit.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain daily records of the startup and shutdown time for emissions units B003, B005, and B006, for each day when emissions unit B005 and/or emissions unit B006 run(s) in combination with emissions unit B003.
2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content, and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Hamilton County Department of Environmental Services.

For each shipment of oil received for burning in this emissions unit the permittee shall maintain records of the name of the oil supplier, the total quantity of oil received, the results of the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO<sub>2</sub> emission rate in lbs/MMBtu (this calculation shall be performed using the equation specified in OAC rule 3745-18-04(F)).

3. The permittee shall collect and record the following information on a monthly basis:
  - a. the total amount of natural gas burned in B003, B004, and B005, combined, in MM cubic feet;
  - b. the total rolling, 12-month summation of the amounts of natural gas burned in B003, B004, and B005, combined, in MM cubic feet;
  - c. the total amount of distillate oil burned in B003, B004, and B005, combined, in gallons; and
  - d. the total rolling, 12-month summation of the amounts of distillate oil burned in B003, B004, and B005, combined, in gallons.
4. The permittee shall maintain monthly records of the total calculated emissions of SO<sub>2</sub>, NO<sub>x</sub>, and CO from B003, B004, and B005, combined, as rolling, 12-month summations. The calculations shall be based on the fuel usage information in A.III.3 and the equations/stack testing results specified in A.V.
5. For each day during which the permittee burns a fuel other than natural gas and/or distillate fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

## IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify each exceedance of the operational restriction identified in A.II.1.

#### **IV. Reporting Requirements (continued)**

2. The permittee shall submit quarterly deviation (excursion) reports that identify any monthly record showing an exceedance of the rolling, 12-month emission limitations in section A.I.2.a.
3. The permittee shall submit, on a quarterly basis, copies or summaries of the permittee's or oil supplier's analyses for each shipment of oil that is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies or summaries of the permittee's or oil supplier's analyses:
  - a. the total quantity of oil received in each shipment of oil (gallons); and
  - b. the calculated sulfur dioxide emission rate (pounds/MMBtu) for each shipment of oil.
4. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

#### **V. Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I.1 of these terms and conditions shall be determined in accordance with the following method(s):

Visible particulate emissions (PE) shall not exceed 20 percent opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

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

Applicable compliance method when burning only natural gas-

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (MM cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs filterable PE/MM cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Applicable compliance method when burning #2 fuel oil-

For the use of no. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

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

## V. Testing Requirements (continued)

3. Emission Limitations -  
0.31 lb of SO<sub>2</sub>/MMBtu of actual heat

97.76 TPY of SO<sub>2</sub>

Applicable compliance method when burning #2 fuel oil-

Compliance with the allowable, lb/MMBtu, sulfur dioxide emission limitation shall be based upon the calculated sulfur dioxide emission rate for each shipment of oil received for burning.

Applicable compliance method when burning natural gas-

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (MM cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 0.6 lb SO<sub>2</sub>/MM cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (MMBtu/hr).

Compliance with the annual SO<sub>2</sub> emission limitation of 97.76 TPY shall be assumed as long as compliance with the lb/MMBtu limitation is maintained (the individual TPY limit was based on the emissions units potential to emit).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations in accordance with USEPA reference Method 6, Method 6A, Method 6B, or Method 6c, whichever is appropriate, of 40 CFR, Part 60, Appendix A.

4. 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 approximately within 3 months of initial permit issuance and within 6 months prior to permit expiration.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable lb/MMBtu emission rates for NO<sub>x</sub> and CO when burning natural gas.
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for NO<sub>x</sub>, Method 7E of 40 CFR Part 60, Appendix A and for CO, Method 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Director (the appropriate Ohio EPA District Office or local air agency).
- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the the Director (the appropriate Ohio EPA District Office or local air agency).

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Director (the appropriate Ohio EPA District Office or local air agency). The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Director's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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 Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Director (the appropriate Ohio EPA District Office or local air agency).

## V. Testing Requirements (continued)

5. Compliance with the emissions unit's TPY emission limitations for NO<sub>x</sub> of 56.76 TPY and CO of 50.46 TPY shall be assumed as long as compliance with the lb/MMBtu limitation is maintained (the individual TPY limits were based on the emissions unit's potentials to emit).
6. Emission Limitations:  
660.8 tons of SO<sub>2</sub> per year as a rolling, 12-month summation;  
466.2 tons of NO<sub>x</sub> per year as a rolling, 12-month summation; and  
109.9 tons of CO per year as a rolling, 12-month summation.

### Applicable Compliance Method:

Compliance shall be determined as the sum of the individual pollutant emissions from the combustion of distillate oil and natural gas as provided below:

- a. For SO<sub>2</sub> from distillate oil:

(the average SO<sub>2</sub> emission rate, for the 12-month period, in lb/MMBtu, from section A.III.2) X (the average of the heat content data for the distillate oil for the 12-month period, from section A.III.2, in MMBtu/gallon) X (the updated rolling 12-month distillate oil usage, in gallons, from section A.III.3.d.)/2000

- b. For SO<sub>2</sub> from natural gas:

(emission Factor from AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) of 0.6 lb SO<sub>2</sub>/MM cubic feet) X (the updated rolling 12-month natural gas usage, in MM cubic feet, from section A.III.3.b.)/2000

- c. For NO<sub>x</sub> and CO from natural gas:

(emission factor from the most recent stack test that demonstrated the emissions unit to be in compliance, in lbs/MM cubic feet) X (the updated rolling 12-month natural gas usage, in MM cubic feet, from section A.III.3.b.)/2000

- d. For NO<sub>x</sub> and CO from distillate oil:

(AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor, in lbs/gallon) X (the updated rolling 12-month distillate oil usage, in gallons, from section A.III.3.d.)/2000

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
72 MMBtu/hr natural gas/distillate oil-fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) boiler No. 1	OAC rule 3745-31-05(A)(3) (PTI 14-4175)	0.016 lb VOC/MMBtu when burning only natural gas* 0.025 lb VOC/MMBtu when burning distillate oil* 6.3 TPY PE* 7.9 TPY VOC*
		The lb/MMBtu and TPY emission limitations are based on the emissions unit's potentials to emit. Therefore no record keeping or reporting requirements are necessary to demonstrate compliance.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

- Compliance with the annual emission limitation for VOC may be demonstrated by multiplying the manufacturer's emission factor of 0.025 lb VOC/MMBtu (worst case for oil) of actual heat input, by the maximum heat input capacity of the boiler (72 MMBTU/hr), by 8760 hours per year, and dividing by 2000 pounds per ton.

If testing is required to demonstrate compliance with the allowable lb VOC/MMBtu emission limitation, testing shall be conducted in accordance with 40 CFR Part 60, Appendix A, Method 18, 25, or 25A as appropriate.

**V. Testing Requirements (continued)**

2. Compliance with the annual emission limitation for PE may be demonstrated by multiplying the manufacturer's emission factor of 0.020 lb PE/MMBtu of actual heat input by the maximum heat input capacity of the boiler (72 MMBTU/hr), by 8760 hours per year, and dividing by 2000 pounds per ton.

If testing is required to demonstrate compliance with the allowable lb PE/MMBtu emission limitation, testing shall be conducted in accordance with 40 CFR Part 60, Appendix A, Method 5.

**VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Paper Machine (P002)

**Activity Description:** Paper machine for the production of paperboard

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 6 paper machine with paper coater	OAC rule 3745-31-05(D) (PTI 14-3951)	See Terms A.I.2.a and A.II.  The requirements of this rule also include compliance with the requirements of OAC rule 3745-21-07(G).
	OAC rule 3745-21-09(F) (paper coating)	The surface coatings employed at the paper-coating section shall not exceed 2.9 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents.
	OAC rule 3745-21-07(G)(2) (paper making)	8 lbs organic compounds (OC)/hour and 40 lbs of OC/day on any days where photochemically reactive materials are used

##### 2. Additional Terms and Conditions

- 2.a The OC emissions from emissions unit P002 shall not exceed the following for paper making and paper coating combined:
  - i. 476.4 pounds of OC per day\*.
  - ii. 38.74 tons of OC per year as a rolling, 12-month summation.

\* The daily OC emission limit is based on the emissions unit's potential to emit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limit.

## II. Operational Restrictions

1. Emissions unit P002 shall not employ coatings and/or chemicals that exceed the following limitations at each given operation:

Operation	Weight percent of organic compounds in the total annual coating/chemical usage	Total annual coating/chemical usage*, in pounds
Paper-making (Wet End)	2.0	8,640,000
Film Forming (Paper Coating)	0.054	25,200,000
Primer Coating (Paper Coating)	0.215	11,400,000
Top Coating (Paper Coating)	0.120	16,800,000

\* Based upon a rolling, 12-month summation.

The above weight percent of organic compounds and usage can be exceeded as long as the emission limitations specified in A.I.2.a are not exceeded.

The OC emissions discharged from the paper-making operation (wet end), are based on 11.1% evaporation of the chemicals in the headwater.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records which list the following information for each surface coating and chemical material employed in paper-making, film forming, primer coating and top coating:
  - a. The company identification of each surface coating and chemical material.
  - b. The amount of each coating and chemical material employed, in pounds.
  - c. The OC content, in pounds of OC per gallon of coating, excluding water and exempt solvents, for each surface coating used for paper coating.
  - d. The weight percent of OC for each coating and/or chemical material employed.
  - e. The total monthly usage of coatings and/or chemicals employed for each of the following operations: paper-making, film forming, primer coating and top coating.
  - f. The monthly OC emissions calculated by taking the summation of (b) times (d) for each coating and chemical material employed.
  - g. The updated rolling, 12-month usage summation of coatings and/or chemicals employed for each of the following operations: paper-making, film forming, primer coating and top coating (the summation of the usages in (e) for the current month and the preceding eleven months).
  - h. The updated rolling, 12-month total OC emissions (the summation of the OC emissions in (f) for the current month and the preceding eleven months).
2. The permittee shall maintain daily records which list the following information for each surface coating and chemical material employed in paper-making, film formers, primer coating and top coating on any day when photochemically reactive materials are used:
  - a. The company identification of each surface coating and chemical material employed and whether or not it is a photochemically reactive material.
  - b. The amount of each coating and chemical material employed, in pounds.
  - c. The weight percent of OC for each coating and/or chemical material employed.
  - d. The total OC emission rate, in pounds per day, calculated by taking the summation of (b) times (c) for each coating and/or chemical material employed.
  - e. The total number of hours of operation of the emissions unit.
  - f. The average pounds per hour OC emission rate calculated by (d) divided by (e).

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports for any exceedance of the annual OC emission limitation specified in A.I.2.a.
2. The permittee shall notify the appropriate Ohio EPA District Office or local air agency in writing of any monthly record showing the use of noncomplying coatings (for VOC content). The notification shall include a copy of such record and shall be sent to the appropriate Ohio EPA District Office or local air agency within 30 days following the end of the calendar month.
3. The permittee also shall submit quarterly deviation (excursion) reports which include the following information:
  - a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day.
  - b. For the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions exceeded 40 pounds per day, and the actual organic compound emissions for each such day.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I-General Term and Condition A.1.c.ii.

#### **V. Testing Requirements**

1. Compliance with the emissions limitations in Term A.I shall be demonstrated by the monitoring and record keeping in Terms A.III.1 and A.III.2.
2. Compliance with the usage limitations in Term A.II.1 shall be demonstrated by the monitoring and record keeping in Term A.III.1.
3. USEPA Method 24 shall be used to determine the VOC contents of the coatings. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all other materials.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

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

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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