Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

1/28/2011

Certified Mail

Facility ID: 0857190001
Permit Number: P0093613
County: Montgomery

Nancy McDonnell
Appleton Papers Inc.
1030 West Alex-Bell Rd.
West Carrollton, OH 45449

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

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. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

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

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

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

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Regional Air Pollution Control Agency

Response to Comments

Response to comments for: Title V Permit

Facility ID:	0857190001
Facility Name:	Appleton Papers Inc.
Facility Description:	paper, coated and laminated
Facility Address:	1030 West Alex-Bell Rd. West Carrollton, OH 45449 Montgomery County
Permit #:	P0093613, Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Dayton Daily News on 06/25/2009. The comment period ended on 07/25/2009.	
Hearing date (if held)	**None**
Hearing Public Notice Date (if different from draft public notice)	None

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: **Part B.2. Insignificant Emissions Units**
    a. Comment: On page 16 of the Draft Permit, Appleton requests that seven additional make up air handling units be added to the list of insignificant emission units located at the facility. There are a total of eight make up air handling units that are natural gas fired heaters. All of the units are identical, however only one is identified in the insignificant emissions unit list. Appleton will update its facility profile adding the additional seven make up air handling units as B702-B708. We also note that the numbers for the fire water pump and cold cleaning are different than from our previous permit. We presume that we should use the numbers that are in the Draft Permit.

    On page 17 of the Draft Permit, Appleton notes that some of the numbers used on the list of units for de minimus insignificant emissions are different than in our former permit. For example, Procote Makedown is number P701 in the Draft Permit and is Z010 in our former permit. We presume we should use the numbers in the Draft Permit.

b. Response: The seven make up air handling units (B702-B708)will be added to the Preliminary Proposed Permit (PPP). Emissions Unit (EU) identification numbers that begin with "Z" are no longer being used by Ohio EPA and those insignificant EUs have been renumbered using identity codes that reflect the appropriate source category for each emissions unit.

2. Topic: **Part C.1. Boiler #3, Emissions Unit B001, Page 20**
   a. Comment: Boiler #3-B001 - On page 20 of the Draft Permit, Appleton requests in paragraph 2(f)(a) under the heading Applicable Compliance Method, please change the reference to OAC Rule 3745-17-03 to OAC Rule 3745-17-03(B)(9) because (B)(9) is the applicable provision.

   b. Response: The requested change has been made and paragraph f)(1)b. has been amended to specify that the requirements of OAC rule 3745-17-03(B)(1) apply to visible emissions determinations completed to demonstrate with OAC rule 3745-17-07(A)(1).

3. Topic: **Boiler No. 2 Emissions unit B002, Page 22**
   a. Comment: On page 22 of the Draft Permit, Appleton requests that the second paragraph of 2(d)(1) be revised to delete the phrase "the sample extraction and transport hardware, sample conditioning hardware" because that phrase does not apply to either Appleton's opacity transmitters or the precipitator optimization system which is are the continuous monitoring systems that Appleton uses for compliance. The sentence should read "Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s) and includes analyzers and data processing hardware and software."

   b. Response: The requested change has been made and the term has been further clarified to indicate that it is a continuous opacity monitoring system (COMS) that does not require sample extraction, transport, or conditioning.

4. Topic: **Boiler No. 2 Emissions unit B002, Page 22**
   a. Comment: On page 22 of the Draft Permit, Appleton requests in paragraph 2(d)(2) the reference to 40 CFR Part 60 be changed to 40 CFR Part 60.13 because that is the applicable provision.

   b. Response: The requested change has been made.

5. Topic: **Boiler No. 2 Emissions unit B002, Page 23**
   a. Comment: On page 23 of the Draft Permit, Appleton requests in paragraph 2(d)(2)(a) the reference to maintaining records of data on opacity on an instantaneous (1 minute) basis be deleted. The regulations require record keeping for successive 6 minute periods which is then used for the 6 minute opacity average. The regulations do not require record keeping for instantaneous (1 minute) intervals. Our permit limit is based on a 6 minute average and not on an instantaneous (1 minute) interval. To keep records of the 1 minute intervals is voluminous. Appleton respectfully requests the deletion of the instantaneous (1 minute) record keeping.

   b. Response: The requested change has been made.

6. Topic: **Boiler No. 2 Emissions unit B002, Page 22-23**
    a. Comment: On page 22-23 of the Draft Permit, Appleton requests that paragraph 2(d)(2) be revised so that it is clear that items 2(d)(2)(a) and (b) are records of data obtained by the continuous opacity monitoring system while paragraphs 2(d)(2)(c), (d), (e), and (f) are record keeping items that will be maintained by Appleton but that do not come from the continuous opacity monitoring system. Perhaps as to (c) through (f), it should state "Permittee shall also maintain records of: (place (c) – (f) here)."

    b. Response: The terms and conditions have been clarified to indicate what records are collected electronically by the COMS and the records that are maintained after data review.

7. Topic: **Boiler No. 2 Emissions unit B002, Page 23**
    a. Comment: On page 23 of the Draft Permit, Appleton requests that the phrase "and when weather conditions allow" be added to paragraph 2(d)(3) so that the sentence reads "The minimum Reference Method 9 evaluation frequency shall be not less than daily, when the emissions unit is in operation and when the weather conditions allow and the COM is out of service." This language was in our prior permit and is necessary for the safety of our personnel.

    b. Response: Inclement weather conditions that would endanger personnel safety would also invalidate Reference Method 9 readings, therefore, the requested change is unnecessary.

8. Topic: **Boiler No. 2 Emissions unit B002, Page 23**
    a. Comment: On page 25 of the Draft Permit, Appleton requests that the last four paragraphs of paragraph 2(d)(7) be moved to the reporting section under paragraph 2(e) because all of them relate to reporting requirements. In addition, there appears to be an inconsistency in that paragraph 2(e)(1)(a) requires reports to be submitted within 30 days following the end of each calendar quarter while the last paragraph in 2(d)(7) as well as paragraph 2(e)(1)(b) requires reports be submitted by January 31, April 30, July 31, and December 31.

    b. Response: The reporting terms and conditions referenced in the comment have been combined with reporting requirements of e)(1)b. and removed from d)(7), the reporting deadlines have been clarified to reflect deadlines of January 31, April 30, July 31, and December 31.

9. Topic: **Boiler No. 4 Emissions unit B003, Page 30**
    a. Comment: On page 30 of the Draft Permit, the description of Boiler #4-B003 includes the incorrect value of 175,000 lb steam/hour. Appleton will update its Facility profile correcting this to 161,000 lb steam/hour.

    b. Response: The requested change has been made.

10. Topic: **Boiler No. 4 Emissions unit B003, Page 31**
    a. Comment: On page 31 of the Draft Permit, Appleton requests that the second paragraph of 3(d)(1) be revised to delete the phrase "the sample extraction and transport hardware, sample conditioning hardware" because that phrase does not apply to either Appleton's opacity transmitters or the precipitator optimization system which is are the continuous monitoring systems that Appleton uses for compliance. The sentence should read "Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s) and includes analyzers and data processing hardware and software."

b. Response: This comment is identical to comment 3, see comment 3.

11. Topic: **Boiler No. 4 Emissions unit B003, Page 31**
    a. Comment: On page 31 of the Draft Permit, Appleton requests the reference to 40 CFR Part 60 in paragraph 3(d)(2) be changed to 40 CFR Part 60.13 as this is the applicable provision.

    b. Response: The requested change has been made.

12. Topic: **Boiler No. 4 Emissions unit B003, Page 32**
    a. Comment: On page 32 of the Draft Permit, Appleton requests in paragraph 3(d)(2)(a) the reference to maintaining records of data on opacity on an instantaneous (1 minute) basis be deleted. The regulations require record keeping for successive 6 minute periods which is then used for the 6 minute opacity average. The regulations do not require record keeping for instantaneous (1 minute) intervals. Our permit limit is based on a 6 minute average and not on an instantaneous (1 minute) interval. To keep records of the 1 minute intervals is voluminous. Appleton respectfully requests the deletion of the instantaneous (1 minute) record keeping.

    b. Response: The requested change has been made.

13. Topic: **Boiler No. 4 Emissions unit B003, Page 31-32**
    a. Comment: On page 31-32 of the Draft Permit, Appleton requests that paragraph 3(d)(2) be revised so that it is clear that items 3(d)(2)(a) and (b) are records of data obtained by the continuous opacity monitoring system while paragraphs 3(d)(2)(c), (d), (e) and (f) are record keeping items that will be maintained by Appleton but that do not come from the continuous opacity monitoring system. Perhaps as to (c) through (f) it should state "Permittee shall also maintain records of: (place (c) –(f) here)."

    b. Response: This comment is identical to comment 6, see comment 6.

14. Topic: **Boiler No. 4 Emissions unit B003, Page 32**
    a. Comment: On page 32 of the Draft Permit, Appleton requests that the phrase "and when weather conditions allow" be added to paragraph 3(d)(3) so that the sentence reads "The minimum Reference Method 9 evaluation frequency shall be not less than daily, when the emissions unit is in operation and when the weather conditions allow and the COM is out of service." This language was in our prior permit and is necessary for the safety of our personnel.

    b. Response: This comment is identical to comment 7, see comment 7.

15. Topic: **Boiler No. 4 Emissions unit B003, Page 32**
    a. Comment: On page 32 of the Draft Permit, Appleton requests that the phrase "or have collected" be added to paragraph 3(d)(4) so that the sentence reads "The Permittee shall collect or have collected, a representative sample of each shipment of coal which is received for burning." This is consistent with the language for Boiler #2.

    b. Response: The requested change has been made.

16. Response Topic: **Off Machine Paper Coater, Emissions Unit K002 Page 40**
    a. Comment: On page 40 of the Draft Permit, Appleton requests that paragraph 4(c)(1) be

changed to read "The total VOC input from coatings applied on this emissions unit shall not exceed 70,400 lbs based upon a rolling 12 months summation of coatings usage." The 68,170 lbs. that is referenced in the Draft Permit does not reflect the 35.2 tons per year that we are allowed under the Draft Permit.

b. Response: The 35.2 tons per year VOC emissions limitation is based on 34.1 tons from coatings use and 1.1 tons from the combustion associated with the air make up units on this emissions unit, see term f)(1)c. The 68,170 lbs VOC input restriction is consistent with the terms and conditions of PTI 08-04881.

17. Topic: **Machine Paper Coater, Emissions Unit K002 Page 41**
    a. Comment: On page 41 of the Draft Permit, Appleton requests clarification on paragraph 4(d)(2)(e) because PTI #08-04881 included a table that provided a 12 month schedule of incrementally increasing allowable emissions culminating with a full annual emission limit at the end of the 12th month. August 2009 will complete K002's first 12 months of operation of the coater and compliance evaluation. The 12 month rolling limit will begin with September 2009. If Ohio EPA anticipates the effective date of the permit to be before September 1, 2009, then the table from PTI #08-04881 should be included in this permit. If Ohio EPA anticipates the effective date of the permit being after September 1, 2009, the reference "after the first 12 calendar months of operation" in paragraph 4(d)(2(e) should be deleted.

    b. Response: The Final Title V permit will not be issued before September 1, 2009.

18. Topic: : **Machine Paper Coater, Emissions Unit K002 Page 41**
    a. Comment: On page 41 of the Draft Permit, Appleton requests that the chart found in paragraph 4(d)(3) be revised so that the Organic HAP content refers to Section 63.3360(c)(3) and the Volatile organic and coating solids refers to 63.3360(d)(2) as these are the applicable provisions.

    b. Response: 40 CFR 63.3360(c) and (d) both allow for multiple compliance options, adding these specific references to one option in the permit would trigger unnecessary permit modifications if different options are selected in the future.

19. Topic: : **Machine Paper Coater, Emissions Unit K002 Page 41**
    a. Comment: On page 41 of the Draft Permit, Appleton presumes that Ohio EPA plans on issuing the permit after September 1, 2009, otherwise revisions need to be made to paragraph 4(e)(2) because it references a rolling 12 month limitation in VOC usage.

    b. Response: References to the first 12-months of operation have been removed from the permit.

20. Topic: **Starch Handling, Emissions Unit P002, Page 44**
    a. Comment: On page 44 of the Draft Permit, Appleton requests that paragraph 5(b)(2) be revised to state the limitation of 5.47 lbs. of PE per hour. Please add the word "per" as it was deleted from the Draft Permit.

    b. Response: The requested change has been made.

21. Topic: **Starch Handling, Emissions Unit P002, Page 44**
    a. Comment: On page 44 of the Draft Permit, Appleton requests that paragraph 5(d)(1) be revised to state "the acceptable range established for the pressure drop across the baghouse is between 0.5 to 10 inches of water." The bags that Appleton uses in these baghouses are rated up to 10 inches of water and normally operate at about 8 inches of water. The new permit should reflect this.

    b. Response: The requested change has been made.

22. Topic: **Starch Handling, Emissions Unit P002, Page 44**
    a. Comment: On page 47 of the Draft Permit, Appleton requests the reference to OAC rule 3745-17-03 in paragraph 5(f)(1)(b) be changed to OAC rule 3745-17-03(B)(1?) (3?) as this is the applicable provision.

    b. Response: The requested change has been made.

23. Topic: **C-Stage Bleaching, Emissions Unit P008, Page 48**
    a. Comment: On page 48 of the Draft Permit, Appleton requests that paragraph 6(b)(2)(a)(i), (ii), (iii) and (iv) be revised so it reflects that only one of the requirements of (ii), (iii) and (iv) need to be complied with. We would suggest adding the word "or" between paragraph (iii) and paragraph (iv). In addition, in order to make this provision clear, we would suggest (ii), (iii) and (iv) be indented under (i) and then renumbered.

    b. Response: The paragraphs have been reformatted and <u>one</u> has been underlined to emphasize that only one of the listed requirements must be met for compliance.

24. Topic: **C-Stage Bleaching, Emissions Unit P008, Page 50**
    a. Comment: On page 50 of the Draft Permit, Appleton requests that paragraph 6(d)(2)(d) be revised to delete the word "initially." Appleton completed their initial demonstration that each enclosure opening is maintained at a negative pressure in April 2001.

    b. Response: The requested change has been made.

25. Topic: **C-Stage Bleaching, Emissions Unit P008, Page 54**
    a. Comment: On page 54 of the Draft Permit, Appleton requests that the requirement set forth in paragraph 6(f)(2) be deleted. 40 CFR Part 63 Subpart S requires only initial testing which Appleton completed in 2001. Subpart S also requires development of parametric monitoring to assure ongoing continuous compliance. Appleton has been in compliance with the parametric monitoring and established limits. Emission testing should not be required particularly where there is no evidence of non-compliance. Appleton also requests that the related paragraph 6(e)(1) be deleted since no report will be required.

    b. Response: Pursuant to ORC 3704.03(I), additional emission tests may be required prior to the renewal of an operating permit (Title V or State PTIO) to confirm continued compliance with an applicable emission limitation and/or control requirement. With the advent of the Title V permit program, there is now a greater burden for a permittee to establish a detailed monitoring, record keeping, and reporting program for significant emissions units to ensure ongoing compliance with the applicable emission limitations and control requirements.

The testing requirement in 6(f)(2) is intended to establish a 10-year testing schedule for this emissions unit, which is consistent with Ohio EPA Engineering Guide 16 and testing at State PTIO renewal for a non-major emissions unit. The emissions testing deadline within two years after final permit issuance would be more than 10 years after the initial compliance demonstration for Subpart S completed in 2001.

26. Topic: **Flyash Silo, Emissions Unit P009, Page 56**
    a. Comment: On page 56 of the Draft Permit, Appleton requests that paragraph 7(d)(1) be revised to replace the word "stack" in the first paragraph with "baghouse" and add the words "from the baghouse" in the first sentence of the second paragraph so the sentence would read "If visible emissions are present from the baghouse, a visible emission incident has occurred." Appleton has two approved methods of emptying fly ash from the silo. The original method is an auger that conveys the ash to a chute emptying into an open dump truck. Appleton adds water in the auger to minimize dust emissions. Appleton also has dry unloading equipment so that ash can be conveyed into sealed tank trucks without water for a company that could reuse the ash, but only if it is dry. The air used to convey the ash to the truck and that is displaced from the truck is vented through the same baghouse used by the system that pneumatically conveys the ash from the boilers to the silo. Under normal operations there should be no visible emissions from the vent from this baghouse, however, there will be slight visible emissions from the wet unloading process that is referred to as the original method. Slight visible emissions from normal operations should not be considered a visible emission incident under this paragraph when Appleton is complying with the particulate emission limits. In addition paragraph 7(e)(1) on page 57 should be revised to state "…for any abnormal emissions of fugitive dust from fly ash unloading" for the same reasons stated above.

    b. Response: This emissions unit is subject to both visible emissions limits for both stack and fugitive particulate emissions regardless of whether the emissions represent normal or abnormal operations. If the visible emissions are representative of normal operations and don't exceed the emissions limitations no corrective action is required, however, the presence of any visible particulate emissions must still be noted as part of a daily check.

27. Topic: **No. 92 Paper Machine – coater, Emissions Unit P011, Page 60**
    a. Comment: On page 60 of the Draft Permit, Appleton requests that paragraph 8(d)(1)(d) be changed to state "the total monthly VOC emissions [the sum of (d)(1)(b) x (d)(1)(c) for all coatings], in pounds."Since the record keeping is monthly and the numbers used from paragraph (d) are monthly, the calculation should reflect the total monthly VOC emissions rather than total VOC emissions "rate" as this is truly not a rate.

    b. Response: This term has been changed to indicate that VOC emissions are to be calculated for each month.

28. Topic: **No. 92 Paper Machine – coater, Emissions Unit P011, Page 61**
    a. Comment: On page 61 of the Draft Permit, Appleton requests that paragraph 8(f)(1)(a) under the heading Applicable Compliance Method be deleted. Appleton has discussed this provision with Ohio EPA and requested its deletion and a new compliance method inserted into the new Draft Permit that is appropriate for this emission unit. For consistency across the emission units,

Appleton suggests using the Applicable Compliance Method that is used for P013. In other words, multiplying the maximum hourly coating usage by the maximum VOC content of all of the coatings.

b. Response: The potential VOC emissions rate and calculation were established as according to PTI 08-2680. The terms and conditions have been changed to reflect that potential VOC emissions are either based on the worst case VOC content of the coating constituents or the maximum production rate of the paper machine.

29. Topic: **No. 92 Paper Machine – coater, Emissions Unit P011, Page 61**
    a. Comment: On page 61 of the Draft Permit, Appleton requests the Applicable Compliance Method in paragraph 8(f)(1)(b) be changed to state "Compliance shall be based on coating formulation data and if requested, VOC content shall be determined according to the requirements of U.S. Reference Method 24 of 40 CFR Part 60, Appendix A. For coating formulations that are prepared using only water and no organic solvents, compliance shall be based on formulation data." This is consistent with the language for K002. Appleton requests, where possible, the language and compliance methods be consistent for all of its coaters.

    b. Response: The requested change has been made.

30. Topic: **No. 91 Paper Machine – coater, Emissions Unit P013, Page 64**
    a. Comment: On page 64 of the Draft Permit, Appleton requests that paragraph 9(d)(1)(d) be deleted and replaced with "The total monthly VOC emissions [the sum of (d)(1)(b) x (d)(1)(c) for all coatings], in pounds." Since the record keeping is monthly and the numbers used from paragraph (d) are monthly, the calculation should reflect the total monthly VOC emissions rather than total VOC emissions "rate" as this is truly not a rate.

    b. Response: This term has been changed to indicate that VOC emissions are to be calculated for each month.

31. Topic: **No. 91 Paper Machine – coater, Emissions Unit P013, Page 64**
    a. Comment: On page 64 of the Draft Permit, Appleton requests that the number 6 set forth in paragraph 9(f)(1)(a) under Applicable Compliance Method be deleted. This number was not in Appleton's prior permit and we do not know where it came from. For consistency purposes, once an agreement is reached on the compliance method for calculating the hourly emissions for the No. 92 paper machine, we could use something similar to calculate these hourly emissions. However, we cannot agree to the 6 gallons per hour as a maximum hourly coating usage because our hourly coating usage, if it includes water-based coatings, is more than that.

    b. Response: The potential VOC emissions rate and calculation were established as according to PTI 08-3433. The terms and conditions have been changed to reflect that potential VOC emissions are either based on the worst case VOC content of the coating constituents or the maximum production rate of the paper machine.

32. Topic: **No. 91 Paper Machine – coater, Emissions Unit P013, Page 64-65**
    a. Comment: On page 64-65 of the Draft Permit, Appleton requests the Applicable Compliance Method in paragraph 9(f)(1)(b) be changed to state "Compliance shall be based on coating formulation data and if requested, VOC content shall be determined according to the

requirements of U.S. Reference Method 24 of 40 CFR Part 60, Appendix A. For coating formulations that are prepared using only water and no organic solvents, compliance shall be based on formulation data." This is consistent with the language for K002. Appleton requests, where possible, the language and compliance methods be consistent for all of its coaters.

b. Response: The requested change has been made.

33. Topic: **No. 93 Paper Machine – coater, Emissions Unit P013, Page 66**

a. Comment: On page 66 of the Draft Permit, Appleton requests that the nitrogen oxide emission rate for tons per year be changed to 5.74 rather than the 3.03 tons per year in the Draft Permit. The 5.74 tons per year was the nitrogen oxide limit from our previous permit based on all of the appropriate calculations. This limit should not have been reduced and we request that it remain the same as our prior permit. The same is true of the carbon monoxide limit. Appleton requests that the 5.29 tons per year limit for carbon monoxide that is in the current Draft Permit be deleted and replaced with 7.05 which was in our prior permit. We have not been provided with any reason for this substantial reduction in our emission limits and based upon all of the previous information submitted, we request that the tons per year limits from our prior permit be placed in the Draft Permit.

b. Response: The annual NOx and CO emissions are based on the emission factors and heat input rates listed in the permit. If modifications have occurred or if the calculations provided as part of the application are incorrect it is Appletons responsibility to provided corrected calculations.

34. Topic: : **No. 93 Paper Machine – coater, Emissions Unit P013, Page 67-68**

a. Comment: On page 67-68 of the Draft Permit, Appleton requests the Applicable Compliance Method in paragraph 10(f)(1)(a) be changed to state "Compliance shall be based on coating formulation data and if requested, VOC content shall be determined according to the requirements of U.S. Reference Method 24 of 40 CFR Part 60, Appendix A. For coating formulations that are prepared using only water and no organic solvents, compliance shall be based on formulation data." This is consistent with the language for K002. Appleton requests, where possible, the language and compliance methods be consistent for all of its coaters.

b. Response: The requested change has been made.

35. Topic: : **No. 93 Paper Machine – coater, Emissions Unit P013, Page 68**

a. Comment: On page 68 of the Draft Permit, Appleton requests that paragraph 10(f)(1)(b) be revised to add the words "excluding water and exempt solvents" at the end of the sentence under the heading Applicable Compliance Method. The sentence would read "Compliance with the daily allowable VOC emission limits above shall be demonstrated by multiplying the maximum coating usage rate (208.4 gallons per day) by the maximum VOC content of coating applied (0.5 pound per gallon excluding water and exempt solvents)."

b. Response: The requested change has been made.

36. Topic: **No. 93 Paper Machine – coater, Emissions Unit P013, Page 68-69**
    a. Comment: On page 68 of the Draft Permit, Appleton requests that the NOx emissions limitation found in paragraph 10(f)(1)(e) be deleted and replaced with 5.74 tons per year which is the limit in our prior permit.

       On page 69 of the Draft Permit, Appleton requests that the CO emission limit in paragraph 10(f)(1)(g) be deleted and replaced with 7.05 tons per year which is the limit in our prior permit.

    b. Response: The annual NOx and CO emissions are based on the emission factors and heat input rates listed in the permit and the Title V permit application. The 5.74 tons per year NOx and 7.05 ton per year CO emissions listed in PTI 08-3640 were determined incorrectly. If modifications have occurred or if the calculations provided as part of the application are incorrect it is Appletons responsibility to provided corrected calculations.

37. Topic: **Emissions Unit P003 and P004 – Bottom Ash Silos, Page 70**
    a. Comment: On page 70 of the Draft Permit, Appleton requests that the first sentence of paragraph 11(d)(1) be revised to add the word "baghouse" before the word "stack" so that the sentence would read "The permittee shall perform daily checks, when the emission unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit." There are two stacks on each of the bottom ash silos, one is an air washer stack that exhausts steam and the other is the baghouse stack so it is important to specify that the reference is to the baghouse stack.

    b. Response: The requested change has been made.

38. Topic: **Emissions Unit P003 and P004 – Bottom Ash Silos, Page 71**
    a. Comment: On page 71 of the Draft Permit, Appleton requests that the word "baghouse" be added before the word "stack" in paragraph 11(e)(1) so that the sentence would read "The permittee shall submit semi-annual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. As described above, there are two stacks on each bottom ash silo so it is important to clarify in the permit the reference is to the baghouse stack.

    b. Response: The requested change has been made.

39. Topic: **Emissions Unit P003 and P004 – Bottom Ash Silos, Page 71**
    a. Comment: On page 71 of the Draft Permit, Appleton requests that paragraph 11(f)(1)(a) under the heading Applicable Compliance Method be revised to reference OAC 3745-17-03(B)(10) rather than the reference to OAC 3745-17-03 since the (B)(10) reference is the applicable provision.

    b. Response: The requested change has been made.

40. Topic: **Emissions Unit P003 and P004 – Bottom Ash Silos, Page 72**
    a. Comment: On page 72 of the Draft Permit, Appleton requests that paragraph 11(f)(1)(b) under the heading Applicable Compliance Method be revised to reflect OAC 3745-17-03(B)(1) rather than OAC 374-17-03 since the (B)(1) reference is the applicable provision.

b. Response: The requested change has been made.

41. Topic: **Emissions Unit P017 and P018 – E and H Stage Bleaching, Page 74**
    a. Comment: On page 74 of the Draft Permit, Appleton requests that paragraph 12(d)(1)(b) be deleted. The concern is whether any material is a photochemically reactive material, therefore Appleton should not be required to keep records of volume in gallons of any material employed unless it is photochemically reactive. The provision should either be deleted or be revised to state "The volume, in gallons of each material employed that is photochemically reactive."

    b. Response: This term has been clarified to indicate that the record keeping requirements are only necessary on days when photochemically reactive materials are employed.

42. Topic: **Emissions Unit P017 and P018 – E and H Stage Bleaching, Page 75**
    a. Comment: On page 75 of the Draft Permit, Appleton requests that the word "coating" be deleted from paragraph 12(f)(1)(b) under the heading Applicable Compliance Method because coatings are not used on this emission unit. The sentence should read "For materials that are prepared using only water and no organic solvents, compliance shall be based on formulation data."

    b. Response: The requested change has been made.

43. Topic: **General Comment**
    a. Comment: Throughout the Draft Permit there are various references to logs, log books and operation logs for record keeping purposes. We presume that this is not a requirement to keep a hard copy record but that electronic record keeping is acceptable. If those references are intended to mean that a hard copy is to be kept Appleton requests that those references be changed to allow for electronic record keeping.

    b. Response: Electronic record keeping is an acceptable format to demonstrate compliance with OAC requirements. However, the handler must be able to produce a hard copy of documents required to be kept upon the request of the appropriate Ohio EPA District Office or local air agency.

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Title V Permit
for
Appleton Papers Inc.

Facility ID:	0857190001
Permit Number:	P0093613
Permit Type:	Renewal
Issued:	1/28/2011
Effective:	2/18/2011
Expiration:	2/18/2016

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Appleton Papers Inc.

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Authorization

Facility ID: 0857190001
Facility Description: paper, coated and laminated
Application Number(s): A0025089, A0036801
Permit Number: P0093613
Permit Description: Title V permit renewal for a paper mill with 2 - spreader stoker coal fired boilers controlled with ESPs, 1 - natural gas fired fired boiler, 3 - paper machines with in-line coaters, 1 - off line coater, 3 - recycled fiber bleaching units, 3 - ash silos and 1- starch silo.
Permit Type: Renewal
Issue Date: 1/28/2011
Effective Date: 2/18/2011
Expiration Date: 2/18/2016
Superseded Permit Number: P0093612

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

Appleton Papers Inc.
1030 West Alex-Bell Rd.
West Carrollton, OH 45449

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

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

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

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

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

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

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

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

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

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

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

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

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

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.
See A.29 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

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

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

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

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

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

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

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Regional Air Pollution Control Agency.

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

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

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

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

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

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

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.
(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

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

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

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by

the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the

applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

14. Permit Shield

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

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

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

15. Operational Flexibility

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

16. Emergencies

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

17. Off-Permit Changes

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

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

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

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-

31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.
(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

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

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

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

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

23. Title VI Provisions

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

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

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

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

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

25. Records Retention Requirements Under State Law Only

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

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.
(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting

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

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.
(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.
The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

B. Facility-Wide Terms and Conditions

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

   a) 40 CFR Part 63, Subpart A

      The permittee is subject to the general requirements specified in 40 CFR Part 63, Subpart A (including the table(s) and appendices referenced in Subpart A).

   b) 40 CFR Part 63, Subpart S

      Emissions Unit P008 is subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for the Pulp and Paper Industry (40 CFR Part 63 Subpart S). The applicable sections of 40 CFR Part 63 Subpart S have been cited in the terms and conditions for emissions unit P008.

   c) 40 CFR Part 63, Subpart JJJJ

      Emissions Unit K002 is subject to the NESHAP for Paper and Other Web Coating The applicable sections of 40 CFR Part 63, Subpart JJJJ have been cited in the terms and conditions for emissions unit K002.

   d) This facility will be subject to 40 CFR Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial/Commercial/Institutional Boilers and Process Heaters upon promulgation. The permittee will be required to comply with all applicable requirements of 40 CFR Part 63, Subpart DDDDD. The permittee will also be required to comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 10 of 40 CFR Part 63, Subpart DDDDD. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart DDDDD and Subpart A.

2. The following insignificant emissions units are located at this facility.

   B700 Diesel Fire Water Pump (formerly Z012)
   B701 Makeup Air Handling Unit #1, 4.95 mmBtu/hour natural gas fired air heater
   B702 Makeup Air Handling Unit #2, 4.95 mmBtu/hour natural gas fired air heater
   B703 Makeup Air Handling Unit #3, 4.95 mmBtu/hour natural gas fired air heater
   B704 Makeup Air Handling Unit #4, 4.95 mmBtu/hour natural gas fired air heater
   B705 Makeup Air Handling Unit #5, 4.95 mmBtu/hour natural gas fired air heater
   B706 Makeup Air Handling Unit #6, 4.95 mmBtu/hour natural gas fired air heater
   B707 Makeup Air Handling Unit #7, 4.95 mmBtu/hour natural gas fired air heater
   B708 Makeup Air Handling Unit #8, 4.95 mmBtu/hour natural gas fired air heater
   F001 Fugitive Dust, Parking Areas & Roadways
   F003 Fugitive Dust, Coal Storage Area
   F004 Fugitive Dust, Coal Dumping and Transfer
   K700 Maintenance painting (formerly Z003)
   L700 Cold Cleaning (central maintenance) (formerly Z015)
   L701 Cold Cleaning (power house) (formerly Z016)
   P010 Chlorine Storage and Distribution
   P019, Ansilex Clay Handling, PTI 08-04240

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

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

P015 No. 91 Paper Machine - Wet End
P016 No. 92 Paper Machine Wet End
P700 No. 93 Paper Machine - Wet End (formerly Z001)
P702 Recycled Fiber Storage Towers (formerly Z013)
T700 Fuel and Lubricating Oil Storage Tanks (formerly Z014)
T701 Process Wastewater Collection Tank (formerly Z005)

C. Emissions Unit Terms and Conditions

1. B001, Boiler #3

Operations, Property and/or Equipment Description:

Natural gas fired package boiler - 90,000 lb steam/hr.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-10(B)(1)	The particulate emissions (PE) from this emissions unit shall not exceed 0.020 pound particulate per million Btu (mmBtu) actual heats input.
b.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. Natural gas is the only fuel capable of being fired in this emissions unit; therefore, the SO_2 emissions limitations of OAC rule 3745-18 are not applicable to this emissions unit.

b. The 0.020 pound of PE per mmBtu of actual heat input emissions limitation refers to the filterable portion of PE, as measured by U.S. EPA Reference Test Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

c. This facility will be subject to 40 CFR Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial/Commercial/Institutional Boilers and Process Heaters. 40 CFR Part 63, Subpart DDDDD upon promulgation. The permittee will be required to comply with all applicable requirements of 40 CFR Part 63, Subpart DDDDD. The permittee will also be required to comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 10 of 40 CFR Part 63, Subpart DDDDD. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart DDDDD and Subpart A.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[Authority for term OAC rule 3745-17-07(A) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Record Keeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term OAC rule 3745-17-07(A) and OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term OAC rule 3745-17-07(A) and OAC rule 3745-77-07(A)(3)]

f) Testing Requirements

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

a. Emission Limitation

The PE from this emissions unit shall not exceed 0.020 pound particulate per mmBtu actual heat input.

Applicable Compliance Method

If requested, Compliance shall be based on the results of emissions testing conducted in accordance with OAC rule 3745-17-03(B)(9) and U.S. EPA Reference Method 5.

b. Emission Limitation

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

Applicable Compliance Method

If requested, compliance shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(1) and U.S. EPA Reference Method 9.

[Authority for term OAC rules 3745-17-03(B), OAC rule 3745-17-07(A)(1) and 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.

2. B002, Boiler #2

Operations, Property and/or Equipment Description:

Coal fired spreader stoker boiler with electrostatic precipitator – 156 mmBtu/hour heat input, 120,000 lbs steam/hour.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-10(C)(1)	The particulate emissions (PE) from this emissions unit shall not exceed 0.13 pound of particulate per million Btu (mmBtu) of actual heat input
b.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-18-63(K)	The sulfur dioxide (SO_2) emissions from this emissions unit shall not exceed 1.6 pounds of SO_2 per million Btu (mmBtu) of actual heat input.
d.	40 CFR Part 64	See b)(2)c., c)(2), d(1), d)(2), d)(6), d)(7) and e)(1)

(2) Additional Terms and Conditions

a. The limitation of 0.13 pound of PE per mmBtu of actual heat input refers to the filterable portion of PE, as measured by U.S. EPA Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

b. This facility will be subject to 40 CFR Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial/Commercial/Institutional Boilers and Process Heaters. 40 CFR Part 63, Subpart DDDDD upon promulgation. The permittee will be required to comply with all applicable requirements of 40 CFR Part 63, Subpart DDDDD. The permittee will also be required to comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 10 of 40

CFR Part 63, Subpart DDDDD. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart DDDDD and Subpart A.

c. The permittee shall maintain a written quality assurance/quality control plan for the continuous opacity monitoring system (COMS), designed to ensure continuous valid and representative readings of opacity and compliance with 40 CFR Part 60, Appendix B, Performance Specification 1. The plan shall include, at a minimum, procedures for conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the COMS, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring accurate operation of the COMS on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the COMS must be kept on site and available for inspection during regular office hours.

c) Operational Restrictions

(1) The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable SO_2 emission limitation specified in b)(1)c.

(2) The permittee shall operate the electrostatic precipitator (ESP) during any operation of this emissions unit, except during periods of startup and shutdown that are exempted pursuant to OAC 3745-17-07(A)(3)(a)(i) and 3745-17-07(A)(3)(b)(i), or during malfunctions that are exempted pursuant to OAC 3745-17-07(A)(3)(c).

d) Monitoring and/or Record Keeping Requirements

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

Each COMS consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the analyzers and data processing hardware and software.

[Authority for term 40 CFR 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 64]

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

The permittee shall maintain records including, but not limited to:

a. percent opacity data obtained by the COMS on a 6-minute block average basis;

b. results of daily zero/span calibration check data obtained by the COMS and the magnitude of manual calibration adjustments;

c. hours of operation of the emissions unit, COMS, and control equipment;

d. the date, time, and hours of operation of the emissions unit without the control equipment and/or the COMS;

e. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the COMS; as well as,

f. the reason (if known) and the corrective actions taken (if any) for each such event in (d) and (e).

[Authority for term 40 CFR 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 64]

(3) The permittee shall conduct or have conducted visible emission evaluations from the stack serving this emissions unit using the methods and procedures specified in U.S. EPA Reference Method 9. for any periods of time where the COM is out of service for 24 hours or longer. The minimum Reference Method 9 evaluation frequency shall be not less than daily, when the emissions unit is in operation and the COM is out if service. For purposes of determining compliance, the minimum total time of observations shall be 1 hour (10 6-minute averages) per day. The results of the visible emissions readings shall be recorded and then maintained in an operations log.

[Authority for term 40 CFR 60.11, OAC rules 3745-17-07(A) and 3745-77-07(A)(3)]

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

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method 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 Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

[Authority for term OAC rule 3745-77-07(A)(3)]

(5) The permittee shall maintain monthly records of the total quantity of coal received, and the results of the analyses for ash content, sulfur content, and heat content, and the calculated sulfur dioxide emission rate, in lb/mmBtu.

[Authority for term OAC rule 3745-77-07(A)(3)]

(6) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for particulate emissions, are the opacity of the visible particulate emissions from the electrostatic precipitator exhaust stack and the electrostatic precipitator power parameters (amperage and power) indicator ranges.

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

The electrostatic precipitator may be evaluated by checking the power parameters (amperage and power) for the ESP's three fields (two inlet fields and one outlet field) to ensure that they are operating within the indicator ranges below on an hourly average basis. The electrostatic precipitator power parameter indicator ranges for normal operation are:

Parameter Range	
Primary Amps	9 - 60
Primary Kw	1.5 - 21

When the opacity exceeds 15% for more than six consecutive minutes and the hourly average of one of the power parameters is outside of the indicator ranges above, additional corrective action focused on the ESP will be required. When opacity exceeds 15% for more than six consecutive minutes and the hourly averages for the power parameters are within the indicator ranges above, corrective action focused on the emission unit will be required.

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

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

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

(7) To obtain an exemption pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain a temperature monitor that measures the temperature of the boiler exhaust gases entering the ESP (a) during 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) during 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). An electronic or hardcopy record of the temperatures during periods of start-up and shutdown shall be maintained.

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

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

e) Reporting Requirements

(1) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its COMS:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, OAC rule 3745-17-07, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. Boiler exhaust gas temperature data shall also be reported if the excess opacity is exempt pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i).

b. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include the following:

i. the facility name and address;

ii. the manufacturer and model number of the continuous opacity monitor;

iii. a description of any change in the equipment that comprises the COMS, including any change to the hardware, changes to the software that may affect COMS readings, and/or changes in the location of the COMS sample probe;

c. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s). Boiler exhaust gas temperature data shall also be reported if the excess opacity is exempt pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i).

i. the total operating time (hours) of the emissions unit;

ii. the total operating time of the COMS while the emissions unit was in operation;

iii. the date, time, and duration of any/each malfunction** of the COMS, emissions unit, and/or control equipment;

iv. the date, time, and duration of any downtime** of the COMS and/or control equipment while the emissions unit was in operation; and

v. the reason (if known) and the corrective actions taken (if any) for each event in (c)(iii) and (iv).

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

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

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

[Authority for term 40 CFR 60.7, 40 CFR Part 64 and OAC rule 3745-77-07(A)(3)]

(2) Quarterly reports shall be submitted concerning the quality and quantity of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:

a. the total quantity of coal received (tons);

b. the average ash content (percent) of the coal received;

c. the average sulfur content (percent) of the coal received;

d. the average heat content (Btu/pound) of the coal received; and

e. the average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received.

These quarterly reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the data obtained during the previous calendar quarters.

[Authority for term OAC rule 3745-77-07(A)(3)]

(3) The permittee shall submit deviation (excursion) reports that identify all U.S. EPA Reference Method 9 readings that exceeded the limitations in OAC rule 3745-17-07 when the emissions unit was operating and the COM was out of service for more than 24 hours. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term OAC rule 3745-77-07(A)(3)]

f) Testing Requirements

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

a. Emission Limitation

The PE from this emissions unit shall not exceed 0.13 pound particulate per mmBtu actual heat input.

Applicable Compliance Method

Compliance shall be based on the results of emission testing conducted in accordance with OAC rule 3745-17-03(B)(9) and U.S. EPA Reference Method 5.

b. Emission Limitation

The SO_2 emissions from this emissions unit shall not exceed 1.6 pounds of SO_2 per million Btu (mmBtu) of actual heat input.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in d)(5) and the equation contained in OAC rule 3745-18-04(F)(1).

If requested, compliance with this mass emission limitation above shall be demonstrated pursuant to OAC rule 3745-18-04(D)(1).

c. Emission Limitation

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

Applicable Compliance Method

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

If requested, compliance shall be based on the results of emissions testing conducted according to OAC rule 3745-17-03(B)(1) and U.S. EPA reference Method 9.

[Authority for term 40 CFR 60.13, 40 CFR Part 60, Appendix B and OAC rule 3745-77-07(A)(3)]

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

a. The emission testing shall be conducted within 12 months of final permit issuance and within 12 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the 0.13 pound particulate per mmBtu actual heat input emissions limitation.

c. The emissions tests shall be conducted in accordance with Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

d. The tests shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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 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.

[Authority for term OAC rule 3745-77-07(A)(3)]

g) Miscellaneous Requirements

(1) None.

3. B003, Boiler #4

Operations, Property and/or Equipment Description:

Coal fired spreader stoker boiler with electrostatic precipitator – 245 mmBtu/hour heat input, 161,000 lb steam/hour.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-10(C)(1)	The particulate emissions (PE) from this emissions unit shall not exceed 0.13 pound of particulate per million Btu (mmBtu) of actual heat input
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-18-63(K)	The sulfur dioxide (SO_2) emissions from this emissions unit shall not exceed 1.6 pounds of SO_2 per million Btu (mmBtu) of actual heat input.
d.	40 CFR Part 64	See c)(2), d(1), d)(2), d)(6), d)(7) and e)(1)

(2) Additional Terms and Conditions

a. The limitation of 0.13 pound of PE per mmBtu of actual heat input refers to the filterable portion of PE, as measured by U.S. EPA Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

b. This facility will be subject to 40 CFR Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial/Commercial/Institutional Boilers and Process Heaters. 40 CFR Part 63, Subpart DDDDD upon promulgation. The permittee will be required to comply with all applicable requirements of 40 CFR Part 63, Subpart DDDDD. The permittee will also be required to comply with all applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 10 of 40

CFR Part 63, Subpart DDDDD. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart DDDDD and Subpart A.

c. The permittee shall maintain a written quality assurance/quality control plan for the continuous opacity monitoring system (COMS), designed to ensure continuous valid and representative readings of opacity and compliance with 40 CFR Part 60, Appendix B, Performance Specification 1. The plan shall include, at a minimum, procedures for conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the COMS, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring accurate operation of the COMS on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the COMS must be kept on site and available for inspection during regular office hours.

c) Operational Restrictions

(1) The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable SO_2 emission limitation specified in b)(1)c.

(2) The permittee shall operate the electrostatic precipitator (ESP) during any operation of this emissions unit, except during periods of startup and shutdown that are exempted pursuant to OAC 3745-17-07(A)(3)(a)(i) and 3745-17- 07(A)(3)(b)(i), or during malfunctions that are exempted pursuant to OAC 3745-17-07(A)(3)(c).

d) Monitoring and/or Record Keeping Requirements

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

Each COMS consists of all the equipment used to acquire and record opacity data in units of all applicable standard(s), and includes the analyzers and data processing hardware and software.

[Authority for term 40 CFR 60.13 and 40 CFR Part 60, Appendix B]

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

The permittee shall maintain records including, but not limited to:

a. percent opacity data obtained by the COMS on a 6-minute block average basis;

b. results of daily zero/span calibration check data obtained by the COMS and the magnitude of manual calibration adjustments;

c. hours of operation of the emissions unit, COMS, and control equipment;

d. the date, time, and hours of operation of the emissions unit without the control equipment and/or the COMS;

e. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the COMS; as well as,

f. the reason (if known) and the corrective actions taken (if any) for each such event in (d) and (e).

[Authority for term 40 CFR 60.13 and 40 CFR Part 60, Appendix B]

(3) The permittee shall conduct or have conducted visible emission evaluations from the stack serving this emissions unit using the methods and procedures specified in U.S. EPA Reference Method 9. for any periods of time where the COM is out of service for 24 hours or longer. The minimum Reference Method 9 evaluation frequency shall be not less than daily, when the emissions unit is in operation and the COM is out if service. For purposes of determining compliance, the minimum total time of observations shall be 1 hour (10 6-minute averages) per day. The results of the visible emissions readings shall be recorded and then maintained in an operations log.

[Authority for term 40 CFR 60.11, OAC rules 3745-17-07(A) and 3745-77-07(A)(3)]

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

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method 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 Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

[Authority for term OAC rule 3745-77-07(A)(3)]

(5) The permittee shall maintain monthly records of the total quantity of coal received, and the results of the analyses for ash content, sulfur content, and heat content, and the calculated sulfur dioxide emission rate, in lb/mmBtu.

[Authority for term OAC rule 3745-77-07(A)(3)]

(6) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for particulate emissions, are the opacity of the visible particulate emissions from the electrostatic precipitator exhaust stack and the electrostatic precipitator power parameters (amperage and power) indicator ranges.

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

The electrostatic precipitator may be evaluated by checking the power parameters (amperage and power) for the ESP's three fields (two inlet fields and one outlet field) to ensure that they are operating within the indicator ranges below on an hourly average basis. The electrostatic precipitator power parameter indicator ranges for normal operation are:

Parameter Range	
Primary Amps	37 - 121
Primary Kw	6 - 30

When the opacity exceeds 15% for more than six consecutive minutes and the hourly average of one of the power parameters is outside of the indicator ranges above, additional corrective action focused on the ESP will be required. When opacity exceeds 15% for more than six consecutive minutes and the hourly averages for the power parameters are within the indicator ranges above, corrective action focused on the emission unit will be required.

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

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

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

(7) To obtain an exemption pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain a temperature monitor that measures the temperature of the boiler exhaust gases entering the ESP (a) during 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) during 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). An electronic or hardcopy record of the temperatures during periods of start-up and shutdown shall be maintained.

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

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

e) Reporting Requirements

(1) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its COMS:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, OAC rule 3745-17-07, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. Boiler exhaust gas temperature data shall also be reported if the excess opacity is exempt pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i).

b. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include the following:

i. the facility name and address;

ii. the manufacturer and model number of the continuous opacity monitor;

iii. a description of any change in the equipment that comprises the COMS, including any change to the hardware, changes to the software that may affect COMS readings, and/or changes in the location of the COMS sample probe;

iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s). Boiler exhaust gas temperature data shall also be reported if the excess opacity is exempt pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i).

v. ;the total operating time (hours) of the emissions unit;

vi. the total operating time of the COMS while the emissions unit was in operation;

vii. the date, time, and duration of any/each malfunction** of the COMS, emissions unit, and/or control equipment;

viii. the date, time, and duration of any downtime** of the COMS and/or control equipment while the emissions unit was in operation; and

ix. the reason (if known) and the corrective actions taken (if any) for each event in (b)(vii) and (viii).

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

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

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

[Authority for term 40 CFR 60.7, OAC rule 3745-77-07(A)(3) and 40 CFR Part 64]

(2) Quarterly reports shall be submitted concerning the quality and quantity of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:

a. the total quantity of coal received (tons);

b. the average ash content (percent) of the coal received;

c. the average sulfur content (percent) of the coal received;

d. the average heat content (Btu/pound) of the coal received; and

e. the average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received.

These quarterly reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the data obtained during the previous calendar quarters.

[Authority for term OAC rule 3745-77-07(A)(3)]

(3) The permittee shall submit deviation (excursion) reports that identify all U.S. EPA Reference Method 9 readings that exceeded the limitations in OAC rule 3745-17-07 when the emissions unit was operating and the COM was out of service for more than 24 hours. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term OAC rule 3745-17-07(A)]

f) Testing Requirements

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

a. Emission Limitation

The PE from this emissions unit shall not exceed 0.13 pound particulate per mmBtu actual heat input.

Applicable Compliance Method

Compliance shall be based on the results of emission testing conducted in accordance with OAC rule 3745-17-03(B)(9) and U.S. EPA Reference Method 5.

b. Emission Limitation

The SO_2 emissions from this emissions unit shall not exceed 1.6 pounds of SO_2 per million Btu (mmBtu) of actual heat input.

Applicable Compliance Method

Compliance shall be based upon the record keeping requirements specified in d)(5) and the equation contained in OAC rule 3745-18-04(F)(1).

If requested, compliance with this mass emission limitation above shall be demonstrated pursuant to OAC rule 3745-18-04(D)(1).

c. Emission Limitation

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

Applicable Compliance Method

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

If requested, compliance shall be based on the results of emissions testing conducted according to OAC rule 3745-17-03(B)(1) and U.S. EPA reference Method 9.

[Authority for term 40 CFR 60.13, 40 CFR Part 60, Appendix B and OAC rule 3745-77-07(A)(3)]

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

a. The emission testing shall be conducted within 12 months of final permit issuance and within 12 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the 0.13 pound particulate per mmBtu actual heat input emissions limitation.

c. The emissions tests shall be conducted in accordance with Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

d. The tests shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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 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.

[Authority for term OAC rule 3745-77-07(A)(3)]

g) Miscellaneous Requirements

(1) None.

4. K002, Off Machine Paper Coater

Operations, Property and/or Equipment Description:

Off Machine Paper Coating Line with Natural Gas Fired Dryers (No.95 CM)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI No. 08-04881	The nitrogen oxide (NOx) emissions from natural gas combustion in this emissions unit shall not exceed 5.05 lbs per hour and 22.2 TPY. The carbon monoxide (CO) emissions from natural gas combustion in this emissions unit shall not exceed 6.87 lbs per hour and 30.1 TPY. See b)(2)a. Compliance with this rule also includes compliance with the requirements of OAC rules 3745-21-09(F), 3745-31-05(D); and 40 CFR Part 63, Subparts A and JJJJ.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)b.
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Major New Source Review)	The volatile organic compound (VOC) emissions from coating use and natural gas combustion in this emissions unit shall not exceed 35.2 TPY based upon a rolling 12-month summation.
d.	OAC rule 3745-21-09(F)	The VOC content of the coatings applied in this emissions unit shall not exceed 2.9 pounds VOC per gallon of coating applied, excluding water and exempt solvents.
e.	40 CFR Part 63, Subpart JJJJ, Paper and Other Web Coating	The organic hazardous air pollutant (HAP) emissions from web coating in this

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	MACT [40 CFR Part 63.3320(b)(3)]	emissions unit shall be limited to no more than 8 percent of the mass of solids applied (0.08 kg organic HAP per kg coating solids), as a monthly average. See d)(3), e(3) and f)(1)h.
f.	40 CFR Part 63, Subpart A, General Provisions MACT [40 CFR 63.1-15]	Table 2 of 40 CFR Part 63, Subpart JJJJ identifies the applicable provisions of 40 CFR 63.1-15.

(2) Additional Terms and Conditions

a. The hourly NOx, and CO emissions limits were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.

b. According to PTI 08-4881 the Best Available Technology (BAT) requirements under OAC rule 3745-31-5(A)(3) do not apply to the PE from this air contaminant source since the uncontrolled potential to emit for particulate is less than ten TPY. The potential particulate emissions from this emissions unit are de minimis (8.4 pounds per day and 1.53 tons per year) and not subject to emissions limitations.

c) Operational Restrictions

(1) The total VOC input from coatings applied on this emissions unit shall not exceed 68,170 pounds based upon a rolling 12-month summation of coatings usage.

[Authority for term PTI 08-04881 and OAC rule 3745-31-05(D)]

d) Monitoring and/or Record Keeping Requirements

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

a. The company identification for each coating applied.

b. The VOC content of each coating, as applied, in pounds of VOC per gallon excluding water and exempt solvents.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-21-09(F)]

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

a. The company identification for each coating applied.

b. The volume, in gallons, of each coating applied.

c. The VOC content of each coating, in pounds per gallon, as applied.

d. The VOC usage rate for all coatings, in pounds per month (the sum of b x c for all coatings applied).

e. The rolling, 12-month summation of the VOC usage figures.

[Authority for term PTI 08-04881, OAC rules 3745-31-05(D) and 3745-77-07(A)(3)]

(3) The permittee shall comply with the record keeping requirements of 40 CFR Part 63, Subpart JJJJ including the following sections:

63.3410(a)(iii), (iv) and (vi)	Monthly record keeping requirements
63.3360(c)	Organic HAP content
63.3360(d)	Volatile organic and coating solids
63.3370(b)	Compliant coatings
63.3370(c)	As-applied compliant coating
63.3370(d)	Monthly allowable organic HAP applied

[Authority for term 40 CFR 63.3280 - 40 CFR 63.3420]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the VOC content of the coating applied in this emissions unit exceeded 2.9 lbs VOC/gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-21-09(F)]

(2) The permittee shall submit quarterly deviation (excursion) reports which identify the following information; all exceedances of the rolling 12-month limitation on VOC usage. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

[Authority for term OAC rules 3745-77-07(A)(3) and 3745-31-05(D)]

(3) The permittee shall comply with the reporting requirements of 40 CFR Part 63, Subpart JJJJ including the following sections:

63.3400(b)	Initial Notification
63.3400(c)	Semiannual reports
63.3400(e)	Notification of Compliance Status

[Authority for Term 40 CFR 63.3280 - 40 CFR 63.3420]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emissions Limitation -

The VOC content of the coatings applied in this emissions unit shall not exceed 2.9 pounds VOC per gallon of coating applied, excluding water and exempt solvents.

Applicable Compliance Method -

Compliance shall be based on coating formulation data and if requested, VOC content shall be determined according to the requirements of U.S. Reference Method 24 of 40 CFR Part 60, Appendix A. For coating formulations that are prepared using only water and no organic solvents, compliance shall be based on formulation data.

b. Emissions Limitation -

The total VOC input from coatings applied on this emissions unit shall not exceed 68,170 pounds based upon a rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements in d)(2) and shall be the sum of the monthly VOC emissions rates for the previous twelve months.

c. Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 35.2 TPY based upon a rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements in d)(2) and shall be the sum of the monthly emissions rates for the previous 12 months plus 1.1 tons potential VOC emissions from natural gas combustion in the process dryers. VOC emissions from natural gas combustion in the process dryers were determined by multiplying the maximum annual potential fuel combustion rate (398.6 million cubic feet) by the emissions factor of 5.5 lbs VOC per million cubic feet burned (AP-42, Table 1.4-1, 7/98), and dividing by 2000 lbs per ton.

d. Emission Limitation:

The NOx emissions from natural gas combustion in this emissions unit shall not exceed 5.05 lbs per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum hourly potential fuel combustion rate (0.0455 million cubic feet) by the emissions factor of 111 lbs NOx per million cubic feet burned (emission factor developed by burner manufacturer).

e. Emission Limitation:

The NOx emissions from natural gas combustion in this emissions unit shall not exceed 22.2 TPY.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum annual potential fuel combustion rate (398.6 million cubic feet) by the emissions factor of 111 lbs NOx per million cubic feet burned (emission factor developed by burner manufacturer), and dividing by 2000 lbs per ton.

f. Emission Limitation:

The CO emissions from natural gas combustion in this emissions unit shall not exceed 6.87 lbs per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum hourly potential fuel combustion rate (0.0455 million cubic feet) by the emissions factor of 151 lbs CO per million cubic feet burned (emission factor developed by burner manufacturer).

g. Emission Limitation:

The CO emissions from natural gas combustion in this emissions unit shall not exceed 30.1 TPY.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum annual potential fuel combustion rate (398.6 million cubic feet) by the emissions factor of 151 lbs CO per million cubic feet burned (emission factor developed by burner manufacturer), and dividing by 2000 lbs per ton.

h. Emission Limitation:

The organic HAP emissions from web coating in this emissions unit shall be limited to no more than 8 percent of the mass of solids applied (0.08 kg organic HAP per kg coating solids), as a monthly average.

Applicable Compliance Method:

Compliance shall be based on coating formulation data or the requirements identified in 40 CFR 63.3360(c) and (d).

[Authority for term OAC rules 3745-77-07(A)(3), 3745-31-05(A)(3), and 3745-21-09(F) and 40 CFR Part 63, Subpart JJJJ]

g) Miscellaneous Requirements

None.

5. P002, Starch Handling

Operations, Property and/or Equipment Description:

Bulk starch unloading from trucks or rail cars to silo and transfer to slurry tank.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11	The particulate emissions (PE) from this emissions unit shall not exceed 5.47 pounds per hour.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. The limitation of 5.47 pounds of PE per hour refers to the filterable portion of PE, as measured by U.S. EPA Reference Test Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

b. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Record Keeping Requirements

(1) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable range established for the pressure drop across the baghouse is between 0.5 to 10.0 inches of water.

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

(2) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a daily basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturers recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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

a.. a description of the corrective action;

b. the date corrective action was completed;

c. the date and time the deviation ended;

d. the total period of time (in minutes) during which there was a deviation;

e. the pressure drop readings immediately after the corrective action was implemented; and

a. the name(s) of the personnel who performed the work.

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

This range or limit on the pressure drop across the baghouse is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted limit or range for the pressure drop based upon information obtained during future testing that demonstrate compliance with the allowable particulate

emission rate for the controlled emissions unit(s). In addition, approved revisions to the range or limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

[Authority for term OAC rules 3745-17-07(A) and 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports which identify the following information:

a. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the acceptable range;

b. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

c. each incident of deviation described in “a” (above) where a prompt investigation was not conducted;

d. each incident of deviation described in “a” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

e. each incident of deviation described in “a” where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.

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

f) Testing Requirements

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

a. <u>Emission Limitation</u>

The PE from this emissions unit shall not exceed 5.47 pounds per hour.

<u>Applicable Compliance Method</u>

Compliance may be determined by multiplying the maximum hourly corn starch unloading rate (84 tons/hour) by the emission factor of 1.3 lbs PE per ton [from the Reasonably Available Control Measures (RACM) Manual, Table 2.5-1 for railcar unloading, 9/80] and an assumed control efficiency of 95% (1 - 0.95).

If requested, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to OAC 3745-17-03(B)(10) and U.S. EPA Reference Method 5.

b. Emission Limitation

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

Applicable Compliance Method

If requested, compliance shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(1) and U.S. EPA Reference Method 9.

[Authority for term OAC rules 3745-17-07(A), 3745-17-11 and 3745-77-07(A)(3)]

g) Miscellaneous Requirements

(1) None.

6. P008, C-Stage Bleaching

Operations, Property and/or Equipment Description:

C-Stage bleaching, recycled fiber chlorine bleaching

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR, Part 63 Subpart S (National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry)	See b)(2)a., b)(2)b. and c(1)

(2) Additional Terms and Conditions

a. The permittee shall achieve compliance with the requirements of 40 CFR Part 63, Subpart S (40 CFR 63.445(c)) as follows:

The permittee shall operate the equipment at each bleaching stage of the bleaching system where chlorinated compounds are introduced, such that it is enclosed and vented into a closed-vent system and routed to a control device that meets <u>one</u> of the following requirements:

i. reduce the total chlorinated hazardous air pollutant (HAP), excluding chloroform, mass in the vent stream entering the control device by 99 percent or more by weight;

ii. achieve a treatment device outlet concentration of 10 parts per million or less by volume of total chlorinated HAP, excluding chloroform; or

iii. achieve a treatment device outlet mass emission rate of 0.001 kg of total chlorinated HAP, excluding chloroform, mass per mega gram (0.002 pound per ton) of oven-dried pulp.

b. The permittee shall perform inspections and maintenance on the packed tower scrubber system controlling the emissions from the chlorination stage bleaching process in accordance with the Inspection and Maintenance Plan submitted on January 13, 1998 or as amended by the company.

c) Operational Restrictions

(1) Each enclosure and closed-vent system used for capturing and transporting vent streams that contain chlorinated HAP, excluding chloroform, emissions shall meet the following requirements:

a. each enclosure shall maintain negative pressure at each enclosure or hood opening as demonstrated by the procedures specified in 63.457 (e) of 40 CFR Part 63, Subpart S (each enclosure or hood opening closed during the initial performance test, shall be maintained in the same closed and sealed position as it was during the performance test at all times, except when it is necessary to use the opening for sampling, inspection, maintenance or repairs);

b. each component of the closed-vent system that is operated at positive pressure and located prior to a control device shall be designed for and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million by volume above background, as measured by the procedures specified in 40 CFR Part 63.457 (d); and

c. each bypass line in the closed-vent system that could divert vent streams containing chlorinated HAPs, excluding chloroform, to the atmosphere without meeting the specified emission limitations shall comply with either of the following requirements:

i. on each bypass line, the permittee shall install, calibrate, maintain, and operate according to manufacturer's specifications a flow indicator that provides a record of the presence of gas stream flow in the bypass line at least once every 15 minutes (the flow indicator shall be installed in the bypass line in such a way as to indicate flow in the bypass line); or

ii. for bypass line valves that are not computer controlled, the permittee shall maintain the bypass line valve in the closed position with a car seal or seal placed on the valve or closure mechanism in such a way that the valve or closure mechanism cannot be opened without breaking the seal.

[Authority for term 40 CFR 63.450]

d) Monitoring and/or Record Keeping Requirements

(1) The permittee shall install, calibrate, certify, operate and maintain according to the manufacturer's specifications, a continuous monitoring system (CMS), as defined in 40 CFR Part 63.2. The CMS shall be operated to measure the following parameters for each gas scrubber used to ensure compliance for the bleaching system:

a. The pH or the oxidation/reduction potential of the gas scrubber effluent.

b. The gas scrubber vent gas inlet flow rate, in scfm.

c. The gas scrubber liquid influent flow rate, in gallons.

In lieu of monitoring the above gas scrubber parameters, the permittee has the option of operating the CMS to measure the chlorine outlet concentration of each gas scrubber

used to comply with the bleaching system allowable concentration of 10 parts per million or less by volume of total chlorinated HAP, excluding chloroform.

[Authority for term 40 CFR 63.453(c)]

(2) The permittee shall comply with the following monitoring requirements:

a. for each enclosure opening, a visual inspection of the closure mechanism specified in 40 CFR Part 63.450(b) shall be performed at least once every 30 days to ensure the opening is maintained in the closed position and sealed;

b. each closed-vent system shall be visually inspected every 30 days and at other times as requested by the Administrator (the visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects);

c. for positive pressure closed-vent systems or portions of closed-vent systems, demonstrate no detectable leaks as specified in 40 CFR Part 63.450(c) measured initially and annually by the procedures in 40 CFR Part 63.457(d);

d. demonstrate annually that each enclosure opening is maintained at negative pressure as specified in 40 CFR Part 63.457(e);

e. the valve or closure mechanism specified in 40 CFR Part 63.450(d)(2) shall be inspected at least once every 30 days to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line; and

f. if an inspection identifies visible defects in ductwork, piping, enclosures or connections to covers, or if an instrument reading of 500 parts per million by volume or greater above background is measured, or if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable:

i. a first effort to repair or correct the closed-vent system shall be made as soon as practicable but no later than 5 calendar days after the problem is identified; and

ii. the repair or corrective action shall be completed no later than 15 calendar days after the problem is identified.

[Authority for term 40 CFR 63.453(k)]

(3) The permittee shall prepare and maintain a site-specific inspection plan, including a drawing or schematic of the components of applicable affected equipment.

[Authority for term 40 CFR 63.453(k)]

(4) The permittee shall collect and maintain the following information for each inspection:

a. Date of inspection.

b. The equipment type and identification.

c. Results of negative pressure tests for enclosures.

d. Results of leak detection tests.

e. The nature of the defect or leak and the method of detection (i.e., visual inspection or instrument detection).

f. The date the defect or leak was detected and the date of each attempt to repair the defect or leak.

g. Repair methods applied in each attempt to repair the defect or leak.

h. The reason for the delay if the defect or leak is not repaired within 15 days after discovery.

i. The expected date of successful repair of the defect or leak if the repair is not completed within 15 days.

j. The date of successful repair of the defect or leak.

k. The position and duration of opening of bypass line valves and the condition of any valve seals.

l. The duration of the use of bypass valves on computer controlled valves.

[Authority for term 40 CFR 63.454(b)]

(5) The permittee shall record the CMS parameters and meet the requirements specified in 40 CFR 63.454 (a) for any new affected process equipment or pulping process condensate stream that becomes subject to the requirements of 40 CFR Part 63, Subpart S due to a change or modification.

[Authority for term 40 CFR 63.454(d)]

(6) The permittee shall operate the control device in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored under d)(1) and d)(2). The operation of the control device below the minimum operating parameter values or above the maximum operating parameter values established or failure to perform procedures required by 40 CFR Part 63, Subpart S, shall constitute a violation of the applicable emission standard and shall be reported as a period of excess emissions.

[Authority for term 40 CFR 63.453(o)]

e) Reporting Requirements

(1) The permittee shall submit a report summarizing the results of the required performance test as specified in f)(1) to the Director (appropriate Ohio EPA District Office or local air agency) before the close of business on the 60th day following the completion of the

performance test, unless specified otherwise or as approved otherwise in writing by the Director.

[Authority for term 40 CFR 63.9(b)(2) and 63.455(a)]

(2) The permittee shall submit excess emissions and continuous monitoring system performance reports and/or summary reports to the Director semiannually, as specified d)(3) and d)(4), except when:

a. the Director determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the emissions unit; or

b. the CMS data are to be used directly for compliance determination and the emissions unit experienced excess emissions, in which case quarterly reports shall be submitted.

Once the permittee reports excess emissions, the permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under 40 CFR 63.10 is approved by the Director.

[Authority for term 40 CFR 63.10(e)(3)(ii)]

(3) Excess emissions and monitoring system performance reports and all summary reports, if required, shall be due on January 31 and July 31 and shall cover the previous six calendar months.

Written reports of excess emissions or exceedances of process or control system parameters shall include all the following information and shall contain the name, title, and signature of the responsible official who is certifying the accuracy of the report:

a. the date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;

b. the date and time identifying each period during which the CMS was out of control, as defined in 40 CFR 63.8(c)(7);

c. the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in the relevant standard(s), that occurs during startups, shutdowns, and malfunctions of this emissions unit;

d. the specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the relevant standard(s), that occurs during periods other than startups, shut-downs, and malfunctions of this emissions unit;

e. the nature and cause of any malfunction (if known);

f. the corrective action taken or preventive measures adopted;

g. the nature of the repairs or adjustments to the CMS that was inoperative or out of control; and

h. the total process operating time during the reporting period.

When no excess emissions or exceedances of a parameter have occurred, or a CMS has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

[Authority for term 40 CFR 63.10(e)(3)(v)]

(4) The summary reports shall contain the following information:

a. the company name and address;

b. an identification of each hazardous air pollutant monitored at this emissions unit;

c. the beginning and ending dates of the reporting period;

d. a brief description of the process units;

e. the emission and operating parameter limitations specified in this permit ;

f. the monitoring equipment manufacturer(s) and model number(s);

g. the date of the latest CMS certification or audit;

h. the total operating time of the affected source during the reporting period;

i. an emission data summary (or similar summary if the permittee monitors control system parameters), including the total duration of excess emissions during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to startup/shutdown, control equipment problems, process problems, other known causes, and other unknown causes;

j. a CMS performance summary (or similar summary if the permittee monitors control system parameters), including the total CMS down-time during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of CMS downtime expressed as a percent of the total source operating time during that reporting period, and a break-down of the total CMS downtime during the reporting period into periods that are due to monitoring equipment malfunctions, non-monitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes;

k. a description of any changes in CMS, processes, or controls since the last reporting period;

l. the name, title, and signature of the responsible official who is certifying the accuracy of the report; and

m. the date of the report.

[Authority for term 40 CFR 63.10(e)(3)(vi)]

f) Testing Requirements

(1) The permittee shall conduct an initial performance test, choose vent sampling port locations and gas stream properties, measure detectable leaks, demonstrate negative pressure, measure chlorinated HAP, excluding chloroform, concentrations, and calculate the vent gas stream in accordance with the methods and procedures outlined in 40 CFR Part 63.457. The permittee satisfied this requirement by completing a performance test on March 7, 2001.

[Authority for term 40 CFR 63.457(a)]

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

a. The emission testing shall be conducted within two years of final permit issuance.

b. The emission testing shall be conducted in order to determine compliance with the emissions limitations of b)(2)a by measuring:

i. the total chlorinated HAP emissions reduction achieved by the alkaline scrubber, excluding chloroform, in percent by weight;

ii. and scrubber outlet concentration in parts per million by volume of total chlorinated HAP, excluding chloroform.

c. The test method(s) employed shall be selected according to the provisions of 40 CFR 63.457.

d. Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

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 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.

[Authority for term OAC rule 3745-77-07(C), 40 CFR 63.457 and 40 CFR 63.7(b)(1)]

g) Miscellaneous Requirements

(1) None.

7. P009, Fly Ash Silo

Operations, Property and/or Equipment Description:

Fly ash silo collects ash from both coal fired boilers.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC Rule 3745-31-05(A)(3) PTI 08-2358	The particulate emissions (PE) from this emissions unit shall not exceed 3.0 pounds per hour and 5.55 tons per year. See b)(2)a and b)(2)d.
b.	OAC Rule 3745-17-07(A)	The visible emission limitation established by this rule are less stringent than the emissions limitations established pursuant to OAC Rule 3745-31-05(A)(3). See b)(2)a.
c.	OAC Rule 3745-17-11(A)	The PE limitations established by this rule are less stringent than the emissions limitations established by OAC Rule 3745-31-05(A)(3). See b)(2)a.
d.	OAC Rule 3745-17-07(B)	See b)(2)c.
e.	OAC Rule 3745-17-08(B)	See b)(2)d.

(2) Additional Terms and Conditions

a. The fabric filters shall achieve an outlet emission rate of not greater than 0.030 grain PE per dry standard cubic foot of exhaust gases or there shall be no visible emissions from the exhaust stacks, whichever is less stringent.

b. The PE limitation of 3.0 pounds per hour and 0.030 grain per dry standard cubic foot refer to the filterable PE as measured by Reference Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

c. While unloading fly ash, visible emissions of fugitive dust shall not exceed 20 percent opacity, as a 3-minute average.

d. While unloading fly ash, reasonably available control measures (RACM) shall be implemented to minimize or eliminate the emissions of fugitive dust to the greatest extent possible.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Record Keeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit and for any visible emissions of fugitive dust from fly ash unloading. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

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

[Authority for term OAC rules 3745-17-07(A) and (B), and 3745-77-07(A)(3)]

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

a. the number of hours the emissions unit was in operation

b. the weight of fly ash handled.

[Authority for term OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and for any visible emissions of fugitive dust from fly ash unloading, and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous six-month periods.

[Authority for term OAC rules 3745-17-07(A) and (B), and 3745-77-07(A)(3)]

(2) The permittee shall submit annual reports that summarize the total hours of operation for this emissions unit for the previous calendar year. The reports shall be submitted by January 31 of each year.

[Authority for term OAC rule 3745-77-07(A)(3)]

f) Testing Requirements

(1) Compliance with the emission limitations in this permit for emissions unit P009 shall be determined in accordance with the following method(s):

a. Emission Limitation-

The PE from this emissions unit shall not exceed 3.0 pounds per hour.

Applicable Compliance Method-

Compliance shall be determined by multiplying the weight of fly ash handled per day, in pounds, times the control efficiency (99.99%) of the fabric filter used for fly ash transfer to the silo, divided by the hours of operation for that day, plus the 2.0 lbs/hour PE rate for the fabric filter (also known as the bin vent filter) that is used to control PE from the silo.

If requested, compliance shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03 and U.S. EPA Reference Method 9.

b. Emission Limitation-

The PE from this emissions unit shall not exceed 5.55 tons per year.

Applicable Compliance Method-

Compliance shall be determined by multiplying the weight of fly ash handled per year, in pounds, times the control efficiency (99.99%) of the fabric filter used for fly ash transfer to the silo, divided by 2,000 lbs per ton, plus the 2.0 lbs/hour PE rate for the fabric filter (also known as the bin vent filter), multiplied by the number of hours the emissions unit operated during the year, divided by 2,000 lbs per ton.

[Authority for term OAC rules 3745-17-07(A), and 3745-77-07(A)(3)]

g) Miscellaneous Requirements

(1) None.

8. P011, No. 92 Paper Machine - Coater

Operations, Property and/or Equipment Description:

No. 92 Paper machine, in-line coater and air floatation dryer.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI No. 08-2680	The volatile organic compound (VOC) content of the coatings applied in this emissions unit shall not exceed 1.0 pound VOC per gallon of coating, excluding water and exempt solvents. The VOC emissions from this emissions unit shall not exceed 2.0 pounds per hour and 3.0 tons per year. The nitrogen oxide (NOx) emissions from this emissions unit shall not exceed 0.125 pound NOx per mmBtu of actual heat input; and 3.50 tons per year. The carbon monoxide (CO) emissions from this emissions unit shall not exceed 0.15 pound CO per mmBtu of actual heat input and 4.20 tons per year.
b.	OAC rule 3745-21-09(F)	The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC 3745-31-05(A)(3)

(2) Additional Terms and Conditions

a. The 2.0 lbs/hour VOC, 0.125 lb NOx/mmBtu and 0.15 lb CO/mmBtu limits were established for PTI purposes to reflect the potential to emit for this emissions

unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Record Keeping Requirements

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

a. The name and identification number of each coating employed, as applied.

b. The volume, in gallons, of each coating employed.

c. The VOC content of each coating formulation, in pounds/gallon (excluding water and exempt solvents), as applied, and each subsequent reformulation based on the U.S. EPA Method 24 analyses of the ingredients. Method 24 analysis is not required for coating formulations that are prepared using only water and no organic solvents.

d. The total VOC emissions each month for all the coatings employed [the sum of (d)(1)b x d)(1)c for all coatings], in pounds.

[Authority for term OAC rules 3745-21-09(F), and 3745-77-07(A)(3)]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[Authority for term OAC rules 3745-21-09(F), and 3745-77-07(A)(3)]

(2) The permittee shall submit annual reports that summarize the actual annual VOC emissions for this emissions unit. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term OAC rule 3745-77-07(A)(3)]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation-

The VOC emissions from this emissions unit shall not exceed 2.0 pounds per hour.

Applicable Compliance Method-

When based on the worst case VOC content coating compliance shall be determined by multiplying the weight fraction VOC of the worst case constituent (18 percent by weight) times the application rate (1 pound/ton paper) times the production rate for that grade of paper (11 tons per hour).

When based on the highest production rate grade of paper compliance shall be determined by multiplying the production rate for that grade of paper, in tons, times the worst case VOC application rate, in lb VOC/ton of paper manufactured.

b. Emission Limitation-

The VOC content of the coatings applied in this emissions unit shall not exceed 1.0 pound VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method-

Compliance with the VOC content limitation above shall be demonstrated based upon the record keeping required in d)(1) of this permit.

Compliance shall be based on coating formulation data and if requested, VOC content shall be determined according to the requirements of U.S. EPA Reference Method 24 of 40 CFR Part 60, Appendix A. For coating formulations that are prepared using only water and no organic solvents, compliance shall be based on formulation data..

c. Emission Limitation-

The CO emissions from this emissions unit shall not exceed 4.20 tons per year.

Applicable Compliance Method-

Provided compliance is shown with the lb CO/mmBtu limitation, compliance with the annual limitation shall also be shown [the annual limitation was calculated by multiplying the maximum hourly heat input capacity of the dryer (6.4 mmBtu/hour) by the emission limitation of 0.15 lb CO/mmBtu and by 8,760 hours, and then dividing by 2000 lbs/ton].

d. Emission Limitation-

The NOx emissions from this emissions unit shall not exceed 3.5 tons per year.

Applicable Compliance Method-

Provided compliance is shown with the lb NOx/mmBtu limitation, compliance with the annual limitation shall also be shown [the annual limitation was calculated by

multiplying the maximum hourly heat input capacity of the dryer (6.4 mmBtu/hour) by the emission limitation of 0.125 lb NOx/mmBtu and by 8,760 hours, and then dividing by 2000 lbs/ton].

e. Emission Limitation-

The VOC emissions from this emissions unit shall not exceed 3.0 tons per year.

Applicable Compliance Method-

Compliance shall be based upon the record keeping required in d)(1) and shall be the summation of the 12 monthly VOC emission rates for the calendar year, divided by 2000 lbs/ton.

f. Emission Limitation-

The NOx emissions from this emissions unit shall not exceed 0.125 pound NOx per mmBtu of actual heat input.

Applicable Compliance Method-

If requested, compliance shall be based upon air emissions testing using Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

g. Emission Limitation-

The CO emissions from this emissions unit shall not exceed 0.15 pound CO per mmBtu of actual heat input.

Applicable Compliance Method-

If requested, compliance shall be based upon air emissions testing using Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.

[Authority for term OAC rules 3745-21-09(F), and 3745-77-07(A)(3)]

g) Miscellaneous Requirements

(1) None.

9. P013, No. 91 Paper Machine - Coater

Operations, Property and/or Equipment Description:

No. 91 Paper machine and in-line coater

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI No. 08-3433	The volatile organic compound (VOC) content of the coating applied in this emissions unit shall not exceed 1.25 pounds of VOC per gallon of coating, excluding water and exempt solvents. The VOC emissions from this emissions unit shall not exceed 7.66 pounds per hour and 15.5 tons per year.
b.	OAC rule 3745-21-09(F)	The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. The 7.66 lbs/hour VOC, limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Record Keeping Requirements

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

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

b. The volume, in gallons, of each coating employed.

c. The VOC content of each coating formulation, in pounds/gallon (excluding water and exempt solvents), as applied, and each subsequent reformulation based on the U.S. EPA Method 24 analyses of the ingredients. Method 24 analysis is not required for coating formulations that are prepared using only water and no organic solvents.

d. The total VOC emissions each month for all the coatings employed [sum of d)(1)b x d)(1)c for all coatings], in pounds.

[Authority for term OAC rules 3745-21-09(F), and 3745-77-07(A)(3)]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[Authority for term OAC rules 3745-21-09(F), and 3745-77-07(A)(3)]

(2) The permittee shall submit annual reports that summarize the actual annual VOC emissions for this emissions unit. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term OAC rule 3745-77-07(A)(3)]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation-

The VOC emissions from this emissions unit shall not exceed 7.66 pounds per hour.

Applicable Compliance Method-

When based on the highest production rate grade of paper compliance shall be determined by multiplying the production rate for that grade of paper, in tons, (6.1 tons) times the worst case VOC application rate, in lbs VOC/ton of paper manufactured (1.24 lbs VOC/ton paper).

b. Emission Limitation-

The VOC content of the coatings applied in this emissions unit shall not exceed 1.25 pound VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method-

Compliance with the VOC content limitation above shall be demonstrated based upon the record keeping required in d)(1) of this permit.

Compliance shall be based on coating formulation data and if requested, VOC content shall be determined according to the requirements of U.S. EPA Reference Method 24 of 40 CFR Part 60, Appendix A. For coating formulations that are prepared using only water and no organic solvents, compliance shall be based on formulation data.

c. Emission Limitation-

The VOC emissions from this emissions unit shall not exceed 15.5 tons per year.

Applicable Compliance Method-

Compliance shall be based upon the record keeping required in d)(1) and shall be the summation of the 12 monthly VOC emission rates for the calendar year, divided by 2000.

[Authority for term OAC rules 3745-21-09(F) and 3745-77-07(A)(3)]

g) Miscellaneous Requirements

(1) None.

10. P014, No. 93 Paper Machine - Coater

Operations, Property and/or Equipment Description:

No. 93 Paper machine, in-line coater and air floatation dryer.

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) PTI No. 08-3640	The volatile organic compound (VOC) emissions from this emissions unit shall not exceed 104.2 pounds per day and 19.03 tons per year. The VOC content of the coatings applied in this emissions unit shall not exceed 0.50 pound VOC per gallon of coating, excluding water and exempt solvents. The nitrogen oxides (NOx) emissions from this emissions unit shall not exceed 0.166 pound NOx per mmBtu actual heat input and 3.30 tons per year. The carbon monoxide (CO) emissions from this emissions unit shall not exceed 0.267 pound CO per mmBtu actual heat input and 5.29 tons per year.
b.	OAC rule 3745-21-09(F)	The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05 (A)(3).

(2) Additional Terms and Conditions

a. The 104.2 lbs/day VOC, 0.166 lb NOx/mmBtu and 0.267 lb CO/mmBtu limits were established for PTI purposes to reflect the potential to emit for this

emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Record Keeping Requirements

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

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

b. The volume, in gallons, of each coating employed.

c. The VOC content of each coating formulation, in pounds/gallon (excluding water and exempt solvents), as applied, and each subsequent reformulation based on the U.S. EPA Method 24 analyses of the ingredients. Method 24 analysis is not required for coating formulations that are prepared using only water and no organic solvents.

d. The total VOC emission rate for all the coatings employed [the sum of (d)(1)b x d)(1)c for all coatings], in pounds.

[Authority for term OAC rules 3745-21-09(F), and 3745-77-07(A)(3)]

e) Reporting Requirements

(1) The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days following the end of the calendar month.

[Authority for term OAC rules 3745-21-09(F), and 3745-77-07(A)(3)]

(2) The permittee shall submit annual reports for this emissions unit that specify the total VOC emissions for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[Authority for term 3745-77-07(A)(3)]

f) Testing Requirements

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

a. Emission Limitation-

The VOC content of the coatings applied in this emissions unit shall not exceed 0.50 lb VOC per gallon of coating, excluding water and exempt solvents.

Applicable Compliance Method-

The permittee shall demonstrate compliance based upon the record keeping required in d(1).

Compliance shall be based on coating formulation data and if requested, VOC content shall be determined according to the requirements of U.S. EPA Reference Method 24 of 40 CFR Part 60, Appendix A. For coating formulations that are prepared using only water and no organic solvents, compliance shall be based on formulation data.

b. .Emission Limitation-

The VOC emissions from this emissions unit shall not exceed 104.2 pounds per day.

Applicable Compliance Method-

Compliance with the daily allowable VOC emission limitation above shall be demonstrated by multiplying the maximum coatings usage rate (208.4 gallons per day) by the maximum VOC content of coatings applied (0.5 pound per gallon excluding water and exempt solvents).

c. Emission Limitation-

The VOC emissions from this emissions unit shall not exceed 19.03 tons per year.

Applicable Compliance Method-

Compliance shall be based upon the record keeping required in d)(1) and the sum of the 12 monthly VOC emission rates for each calendar year, divided by 2000 lbs/ton.

d. Emission Limitations-

The NOx emissions from this emissions unit shall not exceed 0.166 pound NOx per mmBtu actual heat input.

Applicable Compliance Method-

The NOx emissions limitation is based on the company developed emission factor of 0.125 pound NOx/mmBtu the natural gas air floatation dryers plus the manufacturer's emission factor of 0.041 lb NOx/mmBtu for the infrared dryer.

If requested, compliance shall be based upon air emissions testing using Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A.

e. Emission Limitations-

The NOx emissions from this emissions unit shall not exceed 3.30 tons per year.

Applicable Compliance Method-

Compliance with this emissions limitation shall be based on:

i. the product of the emission factor for the air floatation dryers (0.125 pound NOx per mmBtu) multiplied by the maximum heat input rate (4.4 mmBtu), in pounds per hour

ii. the product of the emission factor for the infrared dryer (0.041 pound NOx per mmBtu) multiplied by the maximum heat input rate (4.97 mmBtu), in pounds per hour

iii. The combined emissions rate, (f)(1)e.i. + f)(1)e.ii.) multiplied by 8,760 hours per year and divided by 2,000 pound per ton.

f. Emission Limitation-

The CO emissions from this emissions unit shall not exceed 0.267 pound CO per mmBtu actual heat input.

Applicable Compliance Method-

The CO emissions limitation is based on the company developed emission factor of 0.210 pound CO/mmBtu the natural gas air floatation dryers plus the manufacturer's emission factor of 0.057 lb CO/mmBtu for the infrared dryer.

If requested, compliance shall be based upon air emissions testing using Methods 1 through 4 and 10 of 40 CFR, Part 60, Appendix A.

g. Emission Limitation-

The CO emissions from this emissions unit shall not exceed 5.29 tons per year.

Applicable Compliance Method-

Compliance with this emissions limitation shall be based on:

i. the product of the emission factor for the air floatation dryers (0.21 CO pound per mmBtu) multiplied by the maximum heat input rate (4.4 mmBtu), in pounds per hour

ii. the product of the emission factor for the infrared dryer (0.057 pound CO per mmBtu) multiplied by the maximum heat input rate (4.97 mmBtu), in pounds per hour

iii. the combined emissions rate, [f)(1)g.i. + f)(1)g.ii.] multiplied by 8,760 hours per year and divided by 2,000 pound per ton.

[Authority for term PTI 08-03640, OAC rules 3745-21-09(F), and 3745-77-07(A)(3)]

g) Miscellaneous Requirements

(1) None.

11. Emissions Unit Group - Bottom Ash Silos: P003, P004,

EU ID	Operations, Property and/or Equipment Description
P003	Bottom Ash silo collects bottom ash from boiler #2
P004	Bottom Ash silo collects bottom ash from boiler #4

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-11(B)(1)	The particulate emissions (PE) from this emissions unit shall not exceed 7.58 pounds per hour.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

(2) Additional Terms and Conditions

a. The limitation of 7.58 pounds of PE hour refers to the filterable portion of PE, as measured by U.S. EPA Reference Test Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Record Keeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

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

[Authority for term OAC rules 3745-17-07(A) and 3745-77-07(A)(3)]

e) Reporting Requirements

(1) The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the baghouse stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous six-month periods.

[Authority for term OAC rules 3745-17-07(A) and 3745-77-07(A)(3)]

f) Testing Requirements

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

a. <u>Emission Limitation</u>

The PE from this emissions unit shall not exceed 7.58 pounds per hour.

<u>Applicable Compliance Method</u>

This emissions limitation was developed according to the Appendix of OAC rule 3745-17-11, Table I and a process weight rate of 2.5 tons per hour.

If requested, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to OAC 3745-17-03(B)(10) and U.S. EPA Reference Method 5.

b. Emission Limitation

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

Applicable Compliance Method

If requested, compliance shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(1) and U.S. EPA Reference Method 9.

[Authority for term OAC rules 3745-17-07(A), 3745-17-11 and 3745-77-07(A)(3)]

g) Miscellaneous Requirements

(1) None.

12. Emissions Unit Group - E and H stage bleaching: P017, P018,

EU ID	Operations, Property and/or Equipment Description
P017	E-Stage bleaching
P018	H-Stage bleaching

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-21-07(G)(2)	The organic compound (OC) emissions from this emissions unit shall not exceed 8 pounds per hour and 40 pounds per day. See b)(2)a and b)(2)b.

(2) Additional Terms and Conditions

a. The OC emission limitations of 8 pounds per hour and 40 pounds per day shall cease to be effective and federally enforceable on the date the U.S. EPA approves the current OAC rule 3745-21-07 as a revision to the Ohio SIP for organic compounds. After the rule is added to the Ohio SIP, these emission limitations and the associated monitoring, record keeping, reporting, and testing requirements shall be void.

b. The limitations above include emissions of OC from all of the OC materials employed, excluding the materials documented in the September 5, 2001 letter provided by the permittee.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Record Keeping Requirements

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

a. The company identification for each material employed and documentation as to whether or not each material is a photochemically reactive material.

b. For each day during which a photochemically reactive material is employed:

i. The volume, in gallons, of each material employed.

ii. The organic compound content of each material employed, in pounds per gallon.

iii. the total organic compound emission rate for all the materials employed, in pounds.

iv. For each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation.

v. For each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all the materials employed, i.e., (d)/(e), in pounds per hour (average).

[Note: The organic compound material information must be for the material as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive" is found in OAC rule 3745-21-01(C)(5).]

[Authority for term OAC rule 3745-77-07(A)(3)]

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that 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, and the actual organic compound emissions for each such day.

[Authority for term OAC rule 3745-77-07(A)(3)]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation-

The OC emissions from this emissions unit shall not exceed 8 pounds per hour.

Applicable Compliance Method-

Compliance with the hourly allowable OC emission limitation above shall be based upon the record keeping requirements specified in c)(1).

b. Emission Limitation-

The OC emissions from this emissions unit shall not exceed 40 pounds per day.

Applicable Compliance Method-

Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements specified in c)(1).

Formulation data or U.S. EPA Method 24 shall be used to determine the organic compound contents of the materials employed in this emissions unit. For formulations that are prepared using only water and no organic solvents, compliance shall be based on formulation data.

[Authority for term OAC rule 3745-77-07(A)(3)]

g) Miscellaneous Requirements

(1) None.