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

Certified Mail

4/7/2011

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

Melinda Bird
Burrows Paper Corporation
501 West Main street
Little Falls, NY 13365

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1483040446
Permit Number: P0107655
Permit Type: Renewal
County: Warren

Dear Permit Holder:

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

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer 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

If you have any questions, please contact Hamilton County Dept. of Environmental Services at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

Michael W. Ahern

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

Cc: HCDOES

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Burrows Paper Corporation

Facility ID:	1483040446
Permit Number:	P0107655
Permit Type:	Renewal
Issued:	4/7/2011
Effective:	4/7/2011
Expiration:	4/7/2016

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Burrows Paper Corporation

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Authorization

Facility ID: 1483040446
Application Number(s): A0040742
Permit Number: P0107655
Permit Description: PTIO Renewal for one (1) 21.5 MMBtu/hr natural gas-fired Vapor Power boiler at an FEPTIO facility; administrative modification removing all references to and allowances for No. 2 fuel oil combustion, and all related requirements, at the request of the facility since the boiler does not have the capability to burn oil.
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 4/7/2011
Effective Date: 4/7/2011
Expiration Date: 4/7/2016
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

Burrows Paper Corporation
2000 Commerce Center Drive
Franklin, OH 45005

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0107655
Permit Description: PTIO Renewal for one (1) 21.5 MMBtu/hr natural gas-fired Vapor Power boiler at an FEPTIO facility; administrative modification removing all references to and allowances for No. 2 fuel oil combustion, and all related requirements, at the request of the facility since the boiler does not have the capability to burn oil.

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

Emissions Unit ID:	**B001**
Company Equipment ID:	Vapor Power Boiler
Superseded Permit Number:	P0100553
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a

renewal notice to you approximately six months prior to the expiration date of this permit. However, it is very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. B001, Vapor Power Boiler

Operations, Property and/or Equipment Description:

21.5 MMBtu/hr Vapor Power natural gas boiler

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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)	Emissions of nitrogen oxides (NOx) from this emission unit shall not exceed 0.183 pound per million Btu (MMBtu) and 17.23 tons per year (TPY). Emissions of carbon monoxide (CO) from this emission unit shall not exceed 0.139 pound per MMBtu and 13.09 TPY. Emissions of sulfur dioxide (SO2) from this emission unit shall not exceed 0.0006 pound per MMBtu and 0.06 TPY. Particulate Emissions and emissions of particulate matter 10 microns and less in diameter (PE/PM10) from this emission unit shall not exceed 0.0076 pound per MMBtu and 0.72 TPY.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Emissions of volatile organic compounds (VOC) from this emission unit shall not exceed 0.0055 pound per MMBtu and 0.52 TPY. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1) and 40 CFR Part 60, Subpart Dc.
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-10(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-18-06(D)	Pursuant to OAC rule 3745-18-06(A), this emission unit is exempt from the requirements in OAC rule 3745-18-06(D) since natural gas is the only fuel burned.
e.	40 CFR Part 60, Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [In accordance with §60.40c, this emission is a steam generating unit for which construction, modification, or reconstruction commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr.]	See d)(2).

(2) Additional Terms and Conditions

a. The short-term and annual emission limits were established to reflect the potential to emit for this emission unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these emission limits.

b. This emission unit is a natural gas boiler. There is no need to restrict the use of fuel to natural gas since that is the only fuel capable of being fired in the boiler.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

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

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

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

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the weekly check until the incident has ended. The observer may indicate that the visible emissions 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.

(2) The permittee shall comply with the applicable monitoring and recordkeeping requirements under 40 CFR Part 60, Subpart Dc, including the following section:

§60.48c(g)(2) amount of fuel combusted during each calendar month

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(2) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d)(1) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

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

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 Limitations

Emissions of nitrogen oxides (NOx) from this emission unit shall not exceed 0.183 pound per million Btu (MMBtu)

Emissions of carbon monoxide (CO) from this emission unit shall not exceed 0.139 pound per MMBtu

Emissions of sulfur dioxide (SO2) from this emission unit shall not exceed 0.0006 pound per MMBtu

Particulate Emissions and emissions of particulate matter 10 microns and less in diameter (PE/PM10) from this emission unit shall not exceed 0.0076 pound per MMBtu

Emissions of volatile organic compounds (VOC) from this emission unit shall not exceed 0.0055 pound per MMBtu

Applicable Compliance Methods

If required, compliance with the short-term NOx emission limitation shall be demonstrated by emission testing employing Method 7, or equivalent, of 40 CFR Part 60, Appendix A correlated to the actual heat input, in MMBtu, during the test.

If required, compliance with the short-term CO emission limitation shall be demonstrated by emission testing employing Method 10, or equivalent, of 40 CFR Part 60, Appendix A correlated to the actual heat input, in MMBtu, during the test.

If required, compliance with the short-term SO2 emission limitation shall be demonstrated by emission testing employing Method 6, or equivalent, of 40 CFR Part 60, Appendix A correlated to the actual heat input, in MMBtu, during the test.

If required, compliance with the short-term PE/PM10 emission limitation shall be demonstrated by emission testing employing Method 5, or equivalent, of 40 CFR Part 60, Appendix A correlated to the actual heat input, in MMBtu, during the test.

If required, compliance with the short-term VOC emission limitation shall be demonstrated by emission testing employing Method 25, or equivalent, of 40 CFR Part 60, Appendix A correlated to the actual heat input, in MMBtu, during the test.

The NOx and CO emission limitations were established based on information included in Application A0040742 submitted 2/17/2011 for PTIO P0107655. The SO2, PE/PM10, and VOC emission limitations were established based on Emission Factors from AP-42, Fifth Ed., Chapter 1.4, Natural Gas Combustion, 7/98.

b. Emission Limitations

Emissions of nitrogen oxides (NOx) from this emission unit shall not exceed 17.23 tons per year (TPY).

Emissions of carbon monoxide (CO) from this emission unit shall not exceed 13.09 TPY.

Emissions of sulfur dioxide (SO2) from this emission unit shall not exceed 0.06 TPY.

Particulate Emissions and emissions of particulate matter 10 microns and less in diameter (PE/PM10) from this emission unit shall not exceed 0.72 TPY.

Emissions of volatile organic compounds (VOC) from this emission unit shall not exceed 0.52 TPY.

Applicable Compliance Methods

Compliance with the annual emission limitations shall be demonstrated using the actual annual fuel combusted during the calendar year, as totaled from the monthly records in d)(2), and the pollutant Emission Factors [the short-term emission limits in f)(1)*] in the following calculation for each pollutant:

Actual annual fuel usage, MM cubic feet natural gas/year x 1000 MMBtu/MM cubic feet natural gas x pollutant EFs, pound each pollutant/MMBtu x 1 Ton/2000 pounds = TPY each pollutant

*As outlined in OAC rule 3745-18-04(F)(4), from natural gas, the sulfur dioxide emission rate may be considered to be equal to 0.0 pound SO2/MMBtu. The permittee may use this Emission Factor to calculate annual SO2 emissions.

The emission limitations were established based on information included in Application A0040742 submitted 2/17/2011 for PTIO P0107655 and Emission Factors from AP-42, Fifth Ed., Chapter 1.4, Natural Gas Combustion, 7/98, in the following calculations:

21.5 MMBtu/hr x 0.183 lb NOx/MMBtu x 8760 hr/yr x 1 Ton/2000 lbs = 17.23 TPY NOx

21.5 MMBtu/hr x 0.139 lb CO/MMBtu x 8760 hr/yr x 1 Ton/2000 lbs = 13.09 TPY CO

21.5 MMBtu/hr x 0.0006 lb SO2/MMBtu x 8760 hr/yr x 1 Ton/2000 lbs = 0.06 TPY SO2

21.5 MMBtu/hr x 0.0076 lb PE/PM10/MMBtu x 8760 hr/yr x 1 Ton/2000 lbs = 0.72 TPY PE/PM10

21.5 MMBtu/hr x 0.0055 lb VOC/MMBtu x 8760 hr/yr x 1 Ton/2000 lbs = 0.52 TPY VOC

c. Emission Limitation

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

Applicable Compliance Method

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

(1) None.