



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

5/5/2011

Certified Mail

Kathy Wiedeman
P. H. Glatfelter Company - Chillicothe Facility
232 East 8th Street
Chillicothe, OH 45601

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0671010028
Permit Number: P0107426
Permit Type: Initial Installation
County: Ross

Dear Permit Holder:

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

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification
Ohio EPA-SEDO; Kentucky



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

P.H.Glatfelter Co. – Chillicothe Facility (Glatfelter) is planning to replace its existing woodyard (P902) with a new woodyard. The new equipment will be leased from FulghumFibres, Inc. (Fulghum). Fulghum may be contracted by Glatfelter to operate the equipment with Glatfelter controlling the raw materials. It will be located on Glatfelter property at the same location as the existing woodyard. The new woodyard will continue to supply wood chips and bark to the Chillicothe facility. Glatfelter will supply the feedstock and chips and will control the overall woodyard throughput. The permitted processes are as follows:

F024 - Back-In Bark Truck Dump (which includes the bark truck dump, the bark hog (shredder) and seven transfer points);

F025 – Debarking and Chipping System (includes bark conveying, chipper, conveying to storage piles, and a total of 20 transfer points);

P915 – Chip Conveying/Rechipper (includes screens and rechipper, hardwood and softwood conveying systems, with a total of 13 transfer points.

Glatfelter will also install the following DeMinimus sources whose emissions have been included for the PSD/Netting Determination:

F027 – 6,000 ton bark storage pile

F028 – bark conveying from the bark storage pile to the boiler bark bin

F029 – Hardwood Storage Pile

F030 – Softwood Storage Pile

F031 – Rail Dump and Conveying (proposed)

F032 – Chip Truck Dump – North

F033 – Chip Truck Dump - South

3. Facility Emissions and Attainment Status:

Glatfelter is one of the 28 source categories in the Prevention of Significant Deterioration (PSD) regulations. The facility would be considered a major for Sulfur Dioxide, Nitrogen Dioxide, Carbon Monoxide, and Particulate Matter. The location in Chillicothe, Ohio is an attainment area for all criteria pollutants.

4. Existing Source Credit:

Glatfelter intends to construct the new woodyard in the same location as, and to replace the existing woodyard operations. Processes in the existing woodyard that are being replaced will be shut down once the new woodyard equipment is brought online. Once an element of the new woodyard is started up, the old equipment is intended to be concurrently shut down. The following is a summary of the actual particulate emissions (PE) from P902 (Although originally permitted as a single emissions unit, emissions are broken down into separate process categories):



<u>Process Segment</u>	<u>2008, 2009 Past Actual Emissions (TPY) of PE</u>	
Debarking & Chipping System		12.39
Bark Conveying	0.011	
Bark Storage Pile	0.14	
3,000,000 Cu. Ft. Hardwood Chip Pile		0.27
Softwood Chip Pile	0.15	
Chip Conveying from Storage Piles to Screening to Digesters		0.34
Truck Dump – Hardwood Chips		0.079
Truck Dump – Softwood Chips		0.0045
Truck Dump – Bark	0.92	
Hardwood Pile (Cobra)		0.71
Mulch Pile	0.11	
Slasher Deck	13.70	
Mulch Processing System		0.010
Total Past Actual Average PE		28.84

5. New Source Emissions:

Glatfelter will monitor and restrict the material throughput of the newly permitted processes. In order to ensure that PSD is not triggered, PE from the permitted and permit exempt woodyard processes shall not exceed 42.86 tons per year. Particulate emissions limitations for the facility are written as combined PM/PM10/PM 2.5 limits. The facility has assumed that PM = PM10 +PM2.5 for the non- Exempt sources. The facility will be limited to a combination of operating rate restrictions for the new emissions units:

<u>Source</u>	<u>Annual Throughput (12-Month Rolling Average)</u>	<u>PE(TPY)</u>
F024 Bark Truck Dump	202,000 TPY	3.60
F025 Debarking & Chipping	1,200,000 TPY	25.24
P915 Conveying and Screening	1,600,000 TPY	11.94
Exempt (DeMinimus) sources (listed in 2. Above)	NA	2.08
Total Potential to Emit (PTE)		42.86

The facility has not had contemporaneous emissions increases for PE within the last five years.

New source emissions PTE minus emissions from P902 average for 2008/2009:

$$42.86 - 28.84 = 14.02 \text{ TPY net emissions increase}$$

6. Conclusion:

Limiting the material throughput for F024 to 202,000 TPY; for F025 to 1,200,000 TPY; and P915 to 1,600,000 TPY will result in a net increase in emissions of 14.02 TPY of PE. It will not trigger significance levels for PSD Review. Therefore, the new sources have “netted out” of PSD Review

7. Please provide additional notes or comments as necessary:

BAT Analysis: The new woodyard will employ two high speed radial cranes for log unloading and loading operations. The design of the yard will improve the flow of materials and operational efficiency. The new equipment will have improved design and control efficiencies over existing equipment. Water sprays, 3-sided enclosures, drop chutes and sweep brushes on conveyors, a cyclone on the Rechipper, and building enclosures will ensure compliance with the terms and conditions of this permit. The Operational Restrictions, Monitoring and Record Keeping, Reporting, and Testing required by this permit provide a federally enforceable framework for compliance with state and federal regulations.



The permittee also evaluated, as affected sources Plant roadways and Parking areas and determined they would not be modified by this project. The paper mill's capacity to use chips and bark will not be altered or increased, therefore, will not impact the production capacity of the Pulp Mill or No. 6 Wood Residue Boiler.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE (PM/PM ₁₀ /PM _{2.5})	40.78*

*Does not include the 2.08 tpy from exempt sources.

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
P. H. Glatfelter Company - Chillicothe Facility

Issue Date: 5/5/2011

Permit Number: P0107426

Permit Type: Initial Installation

Permit Description: P.H. Glatfelter Company - Chillicothe Facility is planning to replace the existing woodyard operations with a new woodyard that will be operated by an outside party, but located at the same location as the current woodyard. The new woodyard will consist of various process equipment for converting roundwood logs to bark and chips. The mill will also have the ability to receive chips and bark via trucks and/or railcars. The chips will be refined and screened in the woodyard operations for further processing at the mill. The bark is also processed in the woodyard.

Facility ID: 0671010028

Facility Location: P. H. Glatfelter Company - Chillicothe Facility
232 East 8TH St.,
Chillicothe, OH 45601

Facility Description: Paper (except Newsprint) Mills

Scott J. Nally, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Cara Cherry at Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138 or (740)385-8501. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



DRAFT

**Division of Air Pollution Control
Permit-to-Install**

for

P. H. Glatfelter Company - Chillicothe Facility

Facility ID:	0671010028
Permit Number:	P0107426
Permit Type:	Initial Installation
Issued:	5/5/2011
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
P. H. Glatfelter Company - Chillicothe Facility

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Authorization

Facility ID: 0671010028

Facility Description: Chillicothe Paper Mill.

Application Number(s): A0040687

Permit Number: P0107426

Permit Description: P.H. Glatfelter Company - Chillicothe Facility is planning to replace the existing woodyard operations with a new woodyard that will be operated by an outside party, but located at the same location as the current woodyard. The new woodyard will consist of various process equipment for converting roundwood logs to bark and chips. The mill will also have the ability to receive chips and bark via trucks and/or railcars. The chips will be refined and screened in the woodyard operations for further processing at the mill. The bark is also processed in the woodyard.

Permit Type: Initial Installation

Permit Fee: \$3,750.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 5/5/2011

Effective Date: To be entered upon final issuance

This document constitutes issuance to:

P. H. Glatfelter Company - Chillicothe Facility
232 East 8TH St.
Chillicothe, OH 45601

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

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

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0107426

Permit Description: P.H. Glatfelter Company - Chillicothe Facility is planning to replace the existing woodyard operations with a new woodyard that will be operated by an outside party, but located at the same location as the current woodyard. The new woodyard will consist of various process equipment for converting roundwood logs to bark and chips. The mill will also have the ability to receive chips and bark via trucks and/or railcars. The chips will be refined and screened in the woodyard operations for further processing at the mill. The bark is also processed in the woodyard.

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

- Emissions Unit ID:** **F024**
- Company Equipment ID: Back-In bark Truck Dump
- Superseded Permit Number:
- General Permit Category and Type: Not Applicable

- Emissions Unit ID:** **F025**
- Company Equipment ID: Debarking & Chipping System
- Superseded Permit Number:
- General Permit Category and Type: Not Applicable

- Emissions Unit ID:** **P915**
- Company Equipment ID: Chip Conveying
- Superseded Permit Number:
- General Permit Category and Type: Not Applicable



A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

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

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

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
 - (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions,

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and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Southeast District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

- (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Southeast District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

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- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Southeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Southeast District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Southeast District Office. If no deviations occurred during a calendar quarter, the permitteeshall

Effective Date:To be entered upon final issuance

submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All



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records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

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

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



16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

Effective Date: To be entered upon final issuance

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) None.

C. Emissions Unit Terms and Conditions



1. F024, Back-In Bark Truck Dump

Operations, Property and/or Equipment Description:

Back-In Bark Truck Dump, consisting of the #3 Truck Dump and the associated In-line Bark Hog (Shredder) controlled with water mist spray bar (90% control efficiency). There are a total of 7 conveyor and process transfer points in this emissions unit. The total amount of bark chips processed through this emissions unit is limited to 202,000 tons per rolling, 12-month period.

- 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 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), as effective 11/30/01	Visible PE shall not exceed five percent opacity, as a 6-minute average. Best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust. The requirements of this rule also include the requirements of OAC rule 3745-31-05(D). See b)(2)b. through b)(2)e. below.
b.	OAC rule 3745-31-05(E), as effective 12/01/06	See b)(2)f. below.
c.	OAC rule 3745-17-07(B)(5)	Exempt. See b)(2)g. below.
d.	OAC rule 3745-17-08(B)	Exempt. See b)(2)h. below.
e.	OAC rule 3745-31-05(D) Synthetic minor to avoid PSD	Fugitive PE (PM/PM ₁₀ /PM _{2.5}) shall not exceed 3.60 tons per rolling, 12-month period.



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Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row 1: The total amount of bark chips processed through this emissions unit shall not exceed 202,000 tons per rolling, 12-month period. See b)(2)a. and c)(1) below.

(2) Additional Terms and Conditions

- a. The permittee currently operates a woodyard operation at the facility in Chillicothe, Ohio. The permittee is proposing to install a new woodyard on the site of the existing woodyard. Records shall be kept by the permittee to document the compliance status of the new systems with PSD significance levels. The permittee shall not violate those significance levels. The table below summarizes the average netted emission rates, in tons per year, for the existing woodyard (P902) over the last two years (2008 and 2009):

Table with 4 columns: Pollutant, Existing Woodyard Average Emissions (2008/2009), New Woodyard Potential Emissions, Net Increase. Row 1: Particulate Emissions (PM/PM10/PM2.5), 28.84, 42.86, 14.02

- b. The material handling operations that are covered by this permit and subject to the above-mentioned requirements are listed below:
i. #3 Bark Truck Dump
ii. In-line Bark Hog (Shredder)
iii. seven conveyor and process transfer points
c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirements to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the

December 1, 2006, version of 3745-31-05, then these emission limits/control measures no longer apply.

- d. The permittee shall employ best available control measures on the Back-In Bark Truck Dump process for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's application, the permittee shall install wet suppression at the inlet of the Bark Hog (in line with the Bark Truck Dump) to minimize emissions. The wall height of the truck dump shall be sufficient to, along with covered conveyors, belt brushes and/or wipes installed on the conveyors to minimize or eliminate visible PE and to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing additional measures to ensure compliance.
- e. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the best available technology requirements of OAC rule 3745-31-05.
- f. This rule paragraph applies once U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Permit to Install and Operate P0107426 for this air contaminate source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. Fugitive particulate emissions (PM/PM₁₀/PM_{2.5}) shall not exceed 3.60 tons per year;
 - ii. Water mist spray bar (90% design control efficiency), sufficient treatment frequencies to ensure compliance;
 - iii. Material throughput limited to 202,000 tons per rolling, 12-month period.
 - g. This emissions unit is exempt from the visible particulate emission limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.
 - h. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).
- c) Operational Restrictions
- (1) The permittee has requested a federally enforceable limitation on material throughput in order to restrict the federally enforceable potential to emit. The material throughput (bark chips) processed through F024 is restricted in the manner specified in the following table:



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Month	Maximum Allowable Bark Chips Processed through F024 (in tons)
1	25,000
1-2	50,000
1-3	75,000
1-4	100,000
1-5	125,000
1-6	150,000
1-7	175,000
1-8	200,000
1-9	202,000
1-10	202,000
1-11	202,000
1-12	202,000

After the first 12 calendar months of operation, compliance with the annual material throughput limitation shall be based upon a rolling, 12-month summation of the throughput rates.

- (2) The installation of the emissions units included in this PTI (P0107426), F024, F025 and P915 at the PH Glatfelter facility in Chillicothe, Ohio, is contingent upon the permanent shutdown of the following emissions units' corresponding processes : P902 – Woodyard.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from this emissions unit. The presence or absence of any visible fugitive 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 location and 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;

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- 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 daily 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 maintain records of the following information:
 - a. the total amount of bark processed, in tons, for each month;
 - b. the rolling, 12 month summation of the total bark processed through this emissions unit, in tons;
 - c. the total calculated particulate emissions, in tons, for each month;
 - d. the rolling, 12 month summation of calculated particulate emissions, in tons.
- e) Reporting Requirements
 - (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit semiannual written reports that identify:
 - a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible 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 6-month period.

- (3) Prior to the startup of emissions units F024, F025, P915, and including DeMinimus/exempt emissions units associated with this project, PH Glatfelter shall submit a report documenting the shutdown dates for the corresponding and/or associated processes included in emissions unit P902.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify:



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- a. all deviations (excursions) of the following emission limitations...
i. all exceedances of the 202,000 tons per rolling, 12-month production limitation for F024;
ii. All exceedances of the rolling, 12-month particulate emission limitation for F024.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director...

f) Testing Requirements

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

- a. Emissions Limitation: Fugitive PE (PM/PM10/PM2.5) shall not exceed 3.60 tons per year.

Applicable Compliance Method:

Compliance with the emissions limitation shall be demonstrated based upon the following equations:

Initial compliance has been determined using inputs representing current conditions as follows:

Bark Truck Dump

EF= k (0.0032) [(U/5)^1.3/ (M/2)^1.4]

Where:

- EF= emission factor expressed in pounds per ton (lbs/ton)
k= particle size multiplier for TSP (dimensionless) = 0.35
U= mean wind speed expressed in miles per hour (MPH) = 8.3
M= material moisture content (%) = 44.87%

Therefore, EF = 0.0000794 lbs/ton

maximum annual throughput = 202,000 tons/year (as submitted in PTI application)

(0.0000794 lb/ton)(202,000 tons/year)(7 transfer points)(.0005 ton/lb) = 0.056 tpy



Bark Hog

Emission Factor = 0.35 lb/ton of PM (PM/PM₁₀/PM_{2.5}) (AP-42 Table 10.3-1, 4th Edition)

Assumed 90% control efficiency for water mist spray (as submitted in PTI application)

$$(0.35 \text{ lb/ton})(202,000 \text{ tons/yr})(.0005 \text{ t/lb})(1 - .90 \text{ control eff}) = 3.54 \text{ tpy}$$

$$\text{Total F024 PE (PM/PM}_{10}\text{/PM}_{2.5}) = 0.06\text{t} + 3.54\text{t} = 3.60 \text{ tpy}$$

b. Emissions Limitation:

Visible PE shall not exceed five percent opacity, as a 6-minute average.

Applicable Compliance Method:

If required, visible PE shall be determined according to USEPA Method 9.

g) Miscellaneous Requirements

- (1) None.



2. F025, Debarking & Chipping System

Operations, Property and/or Equipment Description:

Debarkerinfeed chute, Debarker, Chipper Infeed Conveyor, Chipper, chip conveying system from the Chipper to the HW Pile or SW Pile, Surge Bin, 94 Unit Chip Bin, covered bark conveying system from the Debarker to the Bark Storage Pile, Bark Hog, and the 90 Unit Bark Bin. There are a total of 20 conveyor and process transfer points in this emissions unit. Material throughput shall not exceed 1,200,000 tons per rolling 12-month period.

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 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.	ORC 3704.03T	Visible particulate emissions (PE) shall not exceed five percent opacity, as a six minute average. The requirements of this rule also include the requirements of OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD)	Fugitive PE (PM/PM ₁₀ /PM _{2.5}) shall not exceed 25.24 tons per rolling, 12-month period. The total amount of logs processed through this emissions unit shall not exceed 1,200,000 tons per rolling, 12-month period. See b)(2)a., b)(2)b. and c)(1) below.
c.	OAC rule 3745-17-07(B)(5)	Exempt. See b)(2)c. below.
d.	OAC rule 3745-17-08(B)	Exempt. See b)(2)d. below.

(2) Additional Terms and Conditions

- a. The permittee currently operates a woodyard operation at the facility in Chillicothe, Ohio. The permittee is proposing to install a new woodyard on the site of the existing woodyard. Records shall be kept by the permittee to document the compliance status of the new systems with PSD significance levels. The permittee shall not violate those significance levels. The table below summarizes the average netted emission rates, in tons per year, for the existing woodyard (P902) over the last two years (2008 and 2009):

Pollutant	Existing Woodyard Average Emissions (2008/2009)	New Woodyard Potential Emissions	Net Increase
Particulate Emissions (PM/PM ₁₀ /PM _{2.5})	28.84	42.86	14.02

- b. The material handling operations that are covered by this permit and subject to the above-mentioned requirements are listed below:
- i. Drum Debarker and Infeed Chute
 - ii. Bark Hog (Shredder)
 - iii. Chipper Infeed Conveyor
 - iv. Chipper
 - v. Chip Conveying to Softwood and Hardwood Storage Piles
 - vi. 20 conveyor and process transfer points
- c. This emissions unit is exempt from the visible particulate emission limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.
- d. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c) Operational Restrictions

- (1) The permittee has requested a federally enforceable limitation on material throughput in order to restrict the federally enforceable potential to emit. The material throughput (logs) processed through F025 is restricted in the manner specified in the following table:

Month	Maximum Allowable Logs Processed through F025 (in tons)
1	150,000
1-2	300,000
1-3	450,000
1-4	600,000
1-5	750,000
1-6	900,000
1-7	1,050,000
1-8	1,200,000
1-9	1,200,000
1-10	1,200,000
1-11	1,200,000
1-12	1,200,000

After the first 12 calendar months of operation, compliance with the annual material throughput limitation shall be based upon a rolling, 12-month summation of the throughput rates.

- (2) The installation of the emissions units included in this PTI (P0107426), F024, F025 and P915 at the PH Glatfelter facility in Chillicothe, Ohio, is contingent upon the permanent shutdown of the following emissions units' corresponding processes : P902 – Woodyard.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

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- a. the location and 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 daily 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 maintain records of the following information:

- a. the total amount of bark processed, in tons, for each month;
- b. the rolling, 12 month summation of the total bark processed through this emissions unit, in tons;
- c. the total calculated particulate emissions, in tons, for each month;
- d. the rolling, 12 month summation of calculated particulate emissions, in tons.

e) Reporting Requirements

(1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

(2) The permittee shall submit semiannual written reports that identify:

- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible 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 6-month period.



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- (3) Prior to the startup of emissions units F024, F025, P915, and including DeMinimus/exempt emissions units associated with this project, PH Glatfelter shall submit a report documenting the shutdown dates for the corresponding and/or associated processes included in emissions unit P902.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. allexceedances of the 1,200,000 tons per rolling, 12-month production limitation for F025.
 - ii. allexceedances of the rolling, 12-month particulate emission limitation for F025.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

- (1) Compliance with the emissions limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:
 - Visible PE shall not exceed five percent opacity, as a 6-minute average.
 - Applicable Compliance Method:
 - If required, visible PE shall be determined according to USEPA Method 9.
 - b. Emissions Limitation:
 - Fugitive PE (PE/PM₁₀/PM_{2.5}) shall not exceed 25.24 tons per year.
 - Applicable Compliance Method:
 - Compliance with the emissions limitation shall be demonstrated based upon the following equations:

Drum Debarker and Infeed Chute

Emission Factor = 0.024 lb/ton of PM (PM/PM₁₀/PM_{2.5}) (AP-42 Table 10.3-1, 4th Edition)

Assumed 90% control efficiency for water mist spray



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$$0.024 \text{ lb/ton}(1,200,000 \text{ tons/yr})(.0005 \text{ t/lb})(1 - .90 \text{ control eff}) = 1.44 \text{ tpy}$$

Bark Hog

Emission Factor = 0.35 lb/ton of PM (PM/PM10/PM2.5)(AP-42 Table 10.3-1, 4th Edition)

Assumed 90% control efficiency for water mist spray

$$0.35 \text{ lb/ton}(125,000 \text{ tons/yr})(.0005 \text{ t/lb})(1 - .90 \text{ control eff}) = 2.19 \text{ tpy}$$

Bark Conveying from Debarker to Bark Pile and from 90 Unit Bark Bin to Truck

$$EF = k (0.0032) [(U/5)^{1.3} / (M/2)^{1.4}]$$

Where:

- EF= emission factor expressed in pounds per ton (lbs/ton)
- k= particle size multiplier for TSP (dimensionless) = 1
- U= mean wind speed expressed in miles per hour (MPH) = 8.3
- M= material moisture content (%) = 44.87%

Therefore, EF = 0.0000794 lbs/ton

maximum annual throughput = 125,000 tons/year (as submitted in PTIO application)

$$0.0000794 \text{ lb/t}(125,000 \text{ tons/year})(10 \text{ transfer points})(.0005 \text{ ton/lb}) = 0.05 \text{ tpy}$$

Chipper Infeed Conveyor

$$EF = k (0.0032) [(U/5)^{1.3} / (M/2)^{1.4}]$$

Where:

- EF= emission factor expressed in pounds per ton (lbs/ton)
- k= particle size multiplier for TSP (dimensionless) = 1
- U= mean wind speed expressed in miles per hour (MPH) = 8.3
- M= material moisture content (%) = 39.63%

Therefore, EF = 0.0000945 lbs/ton

maximum annual throughput = 1,200,000 tons/year (as submitted in PTIO application)

$$0.0000945 \text{ lb/t}(1,200,000 \text{ tons/year})(2 \text{ transfer points})(.0005 \text{ ton/lb}) = 0.11 \text{ tpy}$$

Chipper

Emission Factor = 0.35 lb/ton of PM (PE/PM10/PM2.5) (AP-42 Table 10.3-1, 4th Edition)



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Assumed 90% control efficiency for water mist spray

$$0.35 \text{ lb/t} (1,200,000) (.0005 \text{ t/lb}) (1 - .90 \text{ control}) = 21.0 \text{ tpy}$$

Chip Conveying to Hardwood and Softwood Storage Piles and from 94 Unit Bin to Truck

$$EF = k (0.0032) [(U/5)^{1.3} / (M/2)^{1.4}]$$

Where:

EF= emission factor expressed in pounds per ton (lbs/ton)

k= particle size multiplier for TSP (dimensionless) = 1

U= mean wind speed expressed in miles per hour (MPH) = 8.3

M= material moisture content (%) = 39.63%

Therefore, EF = 0.0000945 lbs/ton

maximum annual throughput = 1,200,000 tons/year (as submitted in PTI application)

$$0.0000945 \text{ lb/t} (1,200,000 \text{ tons/year}) (8 \text{ transfer points}) (.0005 \text{ ton/lb}) = 0.45 \text{ tpy}$$

$$\text{Total F025 PE (PM/PM}_{10}\text{/PM}_{2.5}\text{)} = 1.44\text{t} + 2.19\text{t} + 0.05\text{t} + 0.11\text{t} + 21.0\text{t} + 0.45\text{t} = 25.24 \text{ tpy}$$

- g) Miscellaneous Requirements
(1) None.



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3. Operations, Property and/or Equipment Description:

Chip conveying system from the HW Storage Pile or SW Storage Pile to the Screening Building, screens, fines and overs conveyors, Rechipper with cyclone, and conveying system from the Screening Building to the Digesters. There are a total of 13 conveyor and process transfer points. Material throughput shall not exceed 1,600,000 tons per year.

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 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.

Table with 2 columns: Applicable Rules/Requirements and Applicable Emissions Limitations/Control Measures. Row a: ORC 3704.03(T) with particulate emissions and visible PE limits. Row b: OAC rule 3745-31-05(D) with PE and fugitive PE limits.



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Table with 3 columns: Row Label, Applicable Rules/Requirements, and Applicable Emissions Limitations/Control Measures. Rows include c, d, and e with corresponding OAC rules and exemption details.

(2) Additional Terms and Conditions

- a. The permittee currently operates a woodyard operation at the facility in Chillicothe, Ohio. The permittee is proposing to install a new woodyard on the site of the existing woodyard. Records shall be kept by the permittee to document the compliance status of the new systems with PSD significance levels. The permittee shall not violate those significance levels. The table below summarizes the average netted emission rates, in tons per year, for the existing woodyard (P902) over the last two years (2008 and 2009):

Table with 4 columns: Pollutant, Existing Woodyard Average Emissions (2008/2009), New Woodyard Potential Emissions, and Net Increase. Row 1: Particulate Emissions (PM/PM10/PM2.5) with values 28.84, 42.86, and 14.02.

- b. The material handling operations that are covered by this permit and subject to the above-mentioned requirements are listed below:
i. Chip Conveying and Screening Systems
ii. Rechipper with cyclone
iii. Softwood Conveying
iv. Hardwood Conveying
v. 13 conveyor and process transfer points
c. This emissions unit is exempt from the visible particulate emission limitations for fugitive dust, specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-



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17-07(B)(11)(e), because the emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08.

d. This emissions unit is not located within areas identified in "Appendix A" of OAC rule 3745-17-08, therefore, the requirements of OAC rule 3745-17-08(B), which requires the installation of reasonably available control measures to prevent fugitive dust, do not apply to this emissions unit pursuant to OAC rule 3745-17-08(A)(1).

c) Operational Restrictions

(1) The permittee has requested a federally enforceable limitation on material throughput in order to restrict the federally enforceable potential to emit. The material throughput (wood chips) processed through P915 is restricted in the manner specified in the following table:

Month	Maximum Allowable Wood Chips Processed through P915 (in tons)
1	175,000
1-2	350,000
1-3	525,000
1-4	700,000
1-5	875,000
1-6	1,050,000
1-7	1,225,000
1-8	1,400,000
1-9	1,575,000
1-10	1,600,000
1-11	1,600,000
1-12	1,600,000

After the first 12 calendar months of operation, compliance with the annual material throughput limitation shall be based upon a rolling, 12-month summation of the throughput rates.

- (2) The installation of the emissions units included in this PTI (P0107426), F024, F025 and P915 at the PH Glatfelter facility in Chillicothe, Ohio, is contingent upon the permanent shutdown of the following emissions units' corresponding processes : P902 – Woodyard.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible fugitive 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 location and 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 daily 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 maintain records of the following information:
 - a. the total amount of wood material processed, in tons, for each month;
 - b. the rolling, 12 month summation of the total wood material processed through this emissions unit, in tons.
 - c. the total calculated particulate emissions, in tons, for each month;
 - d. the rolling, 12 month summation of calculated particulate emissions, in tons.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

- (2) The permittee shall submit semiannual written reports that identify:
- a. all days during which any visible emissions of fugitive dust were observed from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit; and
 - b. any corrective actions taken to minimize or eliminate the visible 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 6-month period.

- (3) Prior to the startup of emissions units F024, F025, P915, and including DeMinimus/exempt emissions units associated with this project, PH Glatfelter shall submit a report documenting the shutdown dates for the corresponding and/or associated processes included in emissions unit P902.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the 1,600,000 tons per rolling, 12-month production limitation for P915.
 - ii. All exceedances of the rolling, 12-month particulate emission limitation for F024.

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted (postmarked) each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

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

Particulate emissions (PE (PM/PM₁₀/PM_{2.5})) from the cyclone exhaust shall not exceed 0.030 gr/dscf.

Applicable Compliance Method:

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

b. Emissions Limitation:

Visible PE from the cyclone exhaust shall not exceed 10 percent opacity, as a 6-minute average.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

c. Emissions Limitation:

Visible PE of fugitive dust shall not exceed five percent opacity, as a six minute average.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

d. Emissions Limitation:

PE (PM/PM₁₀/PM_{2.5}) from the cyclone exhaust shall not exceed 11.26 tons per year.

Applicable Compliance Method:

Compliance with the tons per year emissions limitation shall be demonstrated based upon the following equation:

Rechipper(Controlled by cyclone)

Grain Loading (0.030 gr/dscf)(Flow Rate 10,000cfm)(60 min/hr)/(7,000 gr/lb) (8760 hrs/yr)(.0005 t/lb) = 11.26 tpy

e. Emissions Limitation:

Fugitive PE (PM/PM₁₀/PM_{2.5}) shall not exceed 0.68 ton per year.

Applicable Compliance Method:

Compliance with the emissions limitation shall be demonstrated based upon the following equations:

Effective Date: To be entered upon final issuance**Conveying and Screening Systems**

$$EF = k (0.0032) [(U/5)^{1.3} / (M/2)^{1.4}]$$

Where:

EF= emission factor expressed in pounds per ton (lbs/ton)

k= particle size multiplier for TSP (dimensionless) = 1

U= mean wind speed expressed in miles per hour (MPH) = 8.3

M= material moisture content (%) = 39.63%

Therefore, EF = 0.0000945 lbs/ton

maximum annual throughput = 1,600,000 tons/year (as submitted in PTI application)

$$0.0000945 \text{ lb/t}(1,600,000 \text{ tons/year})(5 \text{ transfer points})(.0005 \text{ ton/lb}) = 0.38 \text{ tpy}$$

Softwood Conveying

$$EF = k (0.0032) [(U/5)^{1.3} / (M/2)^{1.4}]$$

Where:

EF= emission factor expressed in pounds per ton (lbs/ton)

k= particle size multiplier for TSP (dimensionless) = 1

U= mean wind speed expressed in miles per hour (MPH) = 8.3

M= material moisture content (%) = 39.63%

Therefore, EF = 0.0000945 lbs/ton

maximum annual throughput = 480,000 tons/year

$$0.0000945 \text{ lb/t}(480,000 \text{ tons/year})(4 \text{ transfer points})(.0005 \text{ ton/lb}) = 0.09 \text{ tpy}$$

Hardwood Conveying

$$EF = k (0.0032) [(U/5)^{1.3} / (M/2)^{1.4}]$$

Where:

EF= emission factor expressed in pounds per ton (lbs/ton)

k= particle size multiplier for TSP (dimensionless) = 1

U= mean wind speed expressed in miles per hour (MPH) = 8.3

M= material moisture content (%) = 39.63%



Effective Date: To be entered upon final issuance

Therefore, EF = 0.0000945 lbs/ton

maximum annual throughput = 1,120,000 tons/year

$0.0000945 \text{ lb/ton} (1,120,000 \text{ tons/year}) (4 \text{ transfer points}) (.0005 \text{ ton/lb}) = 0.21 \text{ tpy}$

Total P915 PE (PM/PM₁₀/PM_{2.5}) = 0.38t + 0.09t + 0.21t = 0.68 tpy

g) Miscellaneous Requirements

(1) None.