



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.  
Columbus, Ohio 43266-0149  
(614) 644-3020  
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RECEIVED  
OHIO EPA

94 NOV -1 AM 10:05

George V. Voinovich  
Governor

CENTRAL DISTRICT OFFICE

Re: Permit to Install  
Union County  
Application No: 01-4988  
NSPS  
SYNTHETIC MINOR

CERTIFIED MAIL

October 19, 1994

WESTRECO, INC.  
WALTER W. CAREY  
60 BOARDMAN RD.  
NEW MILFORD, CT 06776

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions I urge you to read it carefully.

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

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

Environmental Board of Review  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,

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

cc: US EPA  
CENTRAL DISTRICT OFFICE, DAPC

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## Permit to Install Terms and Conditions

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Application No. 01-4988  
APS Premise No. 0180010122  
Permit Fee: \$400.00

PD 10/25/95

Name of Facility: WESTRECO, INC.

Person to Contact: WALTER W. CAREY

Address: 60 BOARDMAN RD.  
NEW MILFORD, CT 06776

Location of proposed source(s): 809 COLLINS AVE.  
MARYSVILLE, OHIO

Description of proposed source(s):  
TWO 31.4 MMBTU/HR GAS/OIL FIRED BOILERS.

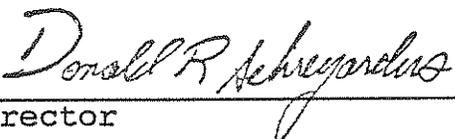
Date of Issuance: October 19, 1994

Effective Date: October 19, 1994

The above named entity is hereby granted a permit to install for the above described source(s) 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 above described source(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 source(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

  
\_\_\_\_\_  
Director

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCES(S)

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code (OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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

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October 19, 1994

the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

#### PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

#### 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.

#### APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

#### BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

#### PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

#### NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for WESTRECO, INC. located in Union County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
B007	31.4 MMBTU/hr gas/oil fired boiler	Use of natural gas and #2 fuel oil as fuel. Sulfur content in fuel oil shall not exceed 0.5% by weight	3745-31-05 3745-31-02 3745-17-07 3745-17-10 40 CFR Part 60 Subpart Dc	0.02 lb PM/MMBTU, Visible particulate emissions shall not exceed 20% as a six minute average, 0.035 lb NO <sub>x</sub> /MMBTU (gas) 0.176 lb NO <sub>x</sub> /MMBTU (oil) 0.001 lb SO <sub>2</sub> /MMBTU (gas) 0.520 lb SO <sub>2</sub> /MMBTU (oil) 0.150 lb CO/MMBTU (gas) 0.070 lb CO/MMBTU (oil) 0.016 lb OC/MMBTU (gas) 0.030 lb OC/MMBTU (oil) See Additional Terms and Conditions
B008	31.4 MMBTU/hr gas/oil fired boiler	Use of natural gas and #2 fuel oil as fuel. Sulfur content in	3745-31-05 3745-31-02 3745-17-07 3745-17-10 40 CFR Part	0.02 lb PM/MMBTU, Visible particulate emissions shall not exceed 20% as a six minute average,

fuel oil shall	60 Subpart	0.035 lb NO <sub>x</sub> /MMBTU
not exceed	Dc	(gas)
0.5% by weight		0.176 lb NO <sub>x</sub> /MMBTU
		(oil)
		0.001 lb SO <sub>2</sub> /MMBTU
		(gas)
		0.520 lb SO <sub>2</sub> /MMBTU
		(oil)
		0.150 lb CO/MMBTU
		(gas)
		0.070 lb CO/MMBTU
		(oil)
		0.016 lb OC/MMBTU
		(gas)
		0.030 lb OC/MMBTU
		(oil)
		See Additional Terms and Conditions

**SUMMARY**

**TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons/Year</u>
PM	5.50
NO <sub>x</sub>	9.64 (gas) 1.99 (oil)
SO <sub>2</sub>	0.26 (gas) 5.88 (oil)
CO	41.26 (gas) 0.79 (oil)
OC	4.38 (gas) 0.34 (oil)

**NSPS REQUIREMENTS**

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source No.</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
B007	31.4 MMBTU/hr boiler	Dc
B008	31.4 MMBTU/hr boiler	Dc

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Permit Management Unit  
P.O. Box 163669  
Columbus, OH 43216-3669

and OEPA Central District Office - DAPC  
2305 Westbrooke Drive, Bldg. C, Box 2198  
Columbus, Ohio 43266-2198

#### RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any representative of the Director, for review during normal business hours.

#### REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to OEPA Central District Office - DAPC, 2305 Westbrooke Drive, Bldg. C, Box 2198, Columbus, Ohio 43266-2198.

#### WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the OEPA Central District Office - DAPC, 2305 Westbrooke Drive, Bldg. C, Box 2198, Columbus, Ohio 43266-2198.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Requirements for the Sampling and Analysis of Oil Burned in Fuel Burning Equipment and for the Recording of the Oil Quality

This facility shall maintain records of the oil supplier's analyses for each shipment of oil which is received for burning in this source. The oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) of each shipment of oil. The following information shall also be included with the copies of the oil supplier's analyses:

- (a) the total quantity of oil received in each shipment (gallons);
- (b) the sulfur content (percent) of the oil received; and
- (c) the heat content (Btu/gallon) of the oil received.

All records required shall be retained on file for a period of not less than three years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any authorized representative of the Director, for review, upon request.

- 2. Any combination of B007 and B008 shall not use more than 161,500 gallons of #2 fuel oil in any rolling 12 month period. This facility shall submit to the Ohio EPA, Central District Office, the above records if the 161,500 gallon limit is exceeded in a rolling 12 month period within 30 days of the exceedance.
- 3. These two sources are subject to sulfur dioxide emission limits under 40 CFR 60 Subpart Dc and are restricted to burning fuel oil with no greater than 0.5% by weight of sulfur. In order to verify compliance, WESTRECO shall submit quarterly reports for the first year after the boilers are operational that cover oil shipments received during the previous quarter.

The quarterly reports shall be submitted by February 15, May 15, August 15, and November 15. Thereafter, these reports shall be submitted as outlined in Term number 2.