



Environmental  
Protection Agency

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

Certified Mail

8/16/2011

Michelle Carpenter  
Mohawk Fine Papers Inc - Beckett Mill  
465 Saratoga Street  
PO Box 497  
Cohoes, NY 12047

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1409040014  
Permit Number: P0107770  
Permit Type: Renewal  
County: Butler

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) 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, Journal News. 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](http://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  
122 South Front Street  
Columbus, Ohio 43215

and Hamilton County Dept. of Environmental Services  
250 William Howard Taft Pkwy.  
Cincinnati, OH 45219-2660

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 Hamilton County Dept. of Environmental Services at (513)946-7777.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
HCDOES; Indiana; Kentucky





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Mohawk Paper Mills - Beckett Mill is a manufacturer of fine specialty papers. The mill operations consist of three natural gas and fuel oil-fired boilers (emissions units B003, B004, and B005) to provide steam for the papermaking operations. The papermaking operation and boilers are all pre-1974 installations with no applicable Permits-to-Install. The facility was issued a Title V operating permit on 4/28/2000, which expired on 4/28/2005. In lieu of renewal, the permittee elected to opt out of the Title V permit program by applying for a federally enforceable state operating permit (FESOP) prior to the expiration of their Title V permit. The FESOP was issued on 3/15/2006 and expired 3/15/2011. This permit action renews the FESOP for this facility.

3. Facility Emissions and Attainment Status:

The Mohawk Paper Mills facility is located in Butler County, Ohio, which is currently non-attainment for particulate matter 2.5 microns and less in diameter ( $PM_{2.5}$ ) and attainment for all other criteria pollutants.

Facility emissions consist of nitrogen oxides ( $NO_x$ ), sulfur dioxide ( $SO_2$ ), carbon monoxide (CO), particulate emissions (PE), volatile organic compounds (VOC), and hazardous air pollutants (HAPs) from three natural gas/oil-fired boilers and VOCs and HAPs from the papermaking operations. The papermaking operations are not subject to any MACT rule (not a pulp mill, no regulated surface coating). The facility-wide potential to emit (PTE) for each individual HAP and all combined HAPs is less than major source thresholds, therefore federally enforceable limitations on HAP emissions is not required. The facility is considered an area source for HAP emissions.

The facility pre-synthetic minor potential to emit is greater than 100 tons per year (TPY) for  $NO_x$  and  $SO_2$  from the existing natural gas/oil-fired boilers; therefore the facility would be considered major under the Title V permitting program. The permittee has requested to opt out of Title V by requesting federally enforceable emission limitations on  $NO_x$  and  $SO_2$  to avoid Title V status. This permit will establish a restriction on #2 fuel oil usage for the boilers and establish 12-month rolling 99.5 TPY of  $NO_x$  and 30.6 TPY of  $SO_2$  emission limitations on the boilers.

The papermaking operation (emissions unit P002) is a minor source of VOC emissions based upon the permittee's demonstrated presumed inherent physical limitations (see DAPC Engineering Guide #61) since actual VOC emissions for the past 10 years have been less than 5 TPY. The uncontrolled PTE for papermaking based upon ENG #61 is 11 TPY for VOC, therefore no federally enforceable limitations are required for emissions unit P002.

4. Source Emissions:

The following table summarizes the pre-synthetic minor (FESOP) potential to emit and the post-synthetic minor potential to emit for the facility emissions units. There are no air pollution control devices on the emissions units, therefore the potential to emit (PTE) given below is uncontrolled.



**Table 1. Facility-Wide Emissions Summary**

Emissions unit	Pre-Synthetic Minor PTE	Post-Synthetic Minor PTE	Actual Emissions
B003 - 30 mmBtu/hr natural gas/oil-fired boiler	17 TPY of NOx 34 TPY of SO2 11 TPY of CO 2.6 TPY of PE <sup>(1)</sup> 0.7 TPY of VOC	All boilers combined: 99.5 TPY of NOx* 30.6 TPY of SO2* 75 TPY of CO 19 TPY of PE <sup>(1)</sup> 4.5 TPY of VOC  *12-month rolling emission limitation based on fuel oil usage restriction	All boilers combined: 28 TPY of NOx 0.2 TPY of SO2 24 TPY of CO 0.8 TPY of PE <sup>(1)</sup> 3.1 TPY of VOC
B004 - 79 mmBtu/hr natural gas/oil-fired boiler	48 TPY of NOx 97 TPY of SO2 28 TPY of CO 7 TPY of PE <sup>(1)</sup> 1.7 TPY of VOC		
B005 - 88 mmBtu/hr natural gas/oil-fired boiler	48 TPY of NOx 97 TPY of SO2 32 TPY of CO 8 TPY of PE <sup>(1)</sup> 2 TPY of VOC		
P002 – Stock prep and papermaking	11 TPY of VOC	11 TPY of VOC	3.86 TPY of VOC
Facility-Wide HAPs	1.5 TPY of Individual HAP (hexane) 1.8 TPY of Combined HAPs	1.5 TPY of Individual HAP (hexane) 1.8 TPY of Combined HAPs	0.51 TPY of Individual HAP (hexane) 0.56 TPY of Combined HAPs

(1) **PE was assumed to be equivalent to PM<sub>10</sub> and PM<sub>2.5</sub>.**

5. Conclusion:

This FESOP permit includes operational restrictions, record keeping and monitoring requirements, and reporting requirements which will allow the facility to determine compliance with the Synthetic Minor limitations. As a result, Mohawk Paper Mills will be a Synthetic Minor facility with respect to the Part 70 Title V requirements.

6. Please provide additional notes or comments as necessary:

None.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
NOx	99.5
SO <sub>2</sub>	30.6
CO	75
PE/PM <sub>10</sub> /PM <sub>2.5</sub>	19
VOC	15.5



PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
Mohawk Fine Papers Inc - Beckett Mill

Issue Date: 8/16/2011  
Permit Number: P0107770  
Permit Type: Renewal  
Permit Description: FEPTIO Renewal for Boilers and Papermaking Operations  
Facility ID: 1409040014  
Facility Location: Mohawk Fine Papers Inc - Beckett Mill  
400 DAYTON STREET,  
Hamilton, OH 45011  
Facility Description: Paper (except Newsprint) Mills

The Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. 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 Paul Tedtman at Hamilton County Dept. of Environmental Services, 250 William Howard Taft Pkwy., Cincinnati, OH 45219-2660 or (513)946-7777. The permit can be downloaded from the Web page: [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc)



**Ohio**

**Environmental  
Protection Agency**

**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Mohawk Fine Papers Inc - Beckett Mill**

Facility ID:	1409040014
Permit Number:	P0107770
Permit Type:	Renewal
Issued:	8/16/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





Division of Air Pollution Control
Permit-to-Install and Operate
for
Mohawk Fine Papers Inc - Beckett Mill

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## Authorization

Facility ID: 1409040014  
Application Number(s): A0041446  
Permit Number: P0107770  
Permit Description: FEPTIO Renewal for Boilers and Papermaking Operations  
Permit Type: Renewal  
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 8/16/2011  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Mohawk Fine Papers Inc - Beckett Mill  
400 DAYTON STREET  
Hamilton, OH 45011

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: P0107770
Permit Description: FEPTIO Renewal for Boilers and Papermaking Operations

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

Emissions Unit ID: P002
Company Equipment ID: Paper Making
Superseded Permit Number: P0096985
General Permit Category and Type: Not Applicable

Group Name: Boilers

Table with 2 columns: Emissions Unit ID and details. Rows include B003, B004, and B005 with their respective equipment IDs, superseded permit numbers, and general permit categories.

## **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<sup>1</sup> 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.

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<sup>1</sup>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**

**Draft Permit-to-Install and Operate**

Mohawk Fine Papers Inc - Beckett Mill

**Permit Number:** P0107770

**Facility ID:** 1409040014

**Effective Date:** To be entered upon final issuance

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.
2. The Ohio EPA has determined that this facility may be subject to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S.EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.

## **C. Emissions Unit Terms and Conditions**

**1. P002, Papermaking**

**Operations, Property and/or Equipment Description:**

Stock Preparation and Papermaking

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 3745-78-02(E)	See b)(2)a., d)(1), and e)(3).

(2) Additional Terms and Conditions

a. The permittee has elected to demonstrate that this emissions unit has presumed inherent physical limitations on the emissions unit's potential to emit (PTE) such that volatile organic compound (VOC) emissions are below twenty percent of major source thresholds, pursuant to OhioEPA Division of Air Pollution Control Engineering Guide #61. The permittee has existing records to demonstrate compliance with the presumed inherent physical limitation designation upon permit issuance.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

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

**Draft Permit-to-Install and Operate**

Mohawk Fine Papers Inc - Beckett Mill

**Permit Number:** P0107770

**Facility ID:** 1409040014

**Effective Date:** To be entered upon final issuance

- a. the name and identification of each liquid organic material employed;
- b. the amount of each liquid organic material employed, in pounds;
- c. the VOC content of each liquid organic material employed, in percent by weight;
- d. the annual VOC input (the summation of the results of the value from line b. multiplied by the value from line c. for each liquid organic material employed), then dividing by 2000; and
- e. the total emissions, in tons, of VOC calculated by taking the annual VOC input value from line d. above and multiplying by the percentage of liquid organic material that is emitted to the air (8.5% based on permittee-provided papermaking water balance data contained in the FEPTIO application, submitted 3/11/2011), then dividing by 2000.

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 an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.
- (3) The permittee shall submit annual reports that specify the total VOC emissions from this emissions unit during the previous calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

f) Testing Requirements

- (1) None.

g) Miscellaneous Requirements

- (1) None.

**2. Emissions Unit Group -Boilers: B003, B004, B005**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
B003	30 mmBtu/hr Natural Gas/No. 2 Oil-Fired Boiler
B004	79 mmBtu/hr Natural Gas/No. 2 Oil-Fired Boiler
B005	88 mmBtu/hr Natural Gas/No. 2 Oil-Fired 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. b)(1)d., c)(3), d)(3), e)(3), f)(1)d., and f)(2).

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 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
b.	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.020 pound per mmBtu of actual heat input when combusting natural gas or No. 2 fuel oil.
c.	OAC rule 3745-18-15(J)	Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.29 pound per mmBtu of actual heat input when combusting No. 2 fuel oil.  See c)(1), c)(2), and c)(5)
d.	OAC rule 3745-31-05(D)  Federally Enforceable Limitations to Avoid Title V	Nitrogen oxides (NOx) emissions shall not exceed 99.5 tons per year (TPY) as a rolling, 12-month summation, from emissions units B003, B004, and B005, combined, when combusting natural gas

**Draft Permit-to-Install and Operate**

Mohawk Fine Papers Inc - Beckett Mill

**Permit Number:** P0107770

**Facility ID:** 1409040014

**Effective Date:** To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		or No. 2 fuel oil. Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 30.6 tons per year (TPY) as a rolling, 12-month summation, from emissions units B003, B004, and B005, combined, when combusting natural gas or No. 2 fuel oil.  See c)(3).
e.	40 CFR Part 63, Subpart JJJJJJ (40 CFR 63.11193 – 63.11237)  National Emission Standards for Hazardous Air Pollutants (NESHAP), for Industrial, Commercial, and Institutional Boilers Area Sources.  In accordance with 40 CFR 63.11194, emissions units B003, B004, and B005 are industrial gas-fired and oil-fired boilers, constructed before June 4, 2010, and located at an area source.	See Section B.2., Facility-Wide Terms and Conditions.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) The daily average operating rate for emissions unit B003 shall not exceed 27 mmBtu per hour.
- (2) The daily combined average operating rate for emissions units B004 and B005 shall not exceed 153 mmBtu per hour.
- (3) The maximum amount of No. 2 fuel oil combusted in emissions units B003, B004, and B005, combined, shall not exceed 1,500,000 gallons per year, as a rolling 12-month summation. The permittee has existing records to demonstrate compliance upon issuance of this permit, therefore first year monthly fuel oil usage amounts are not necessary.
- (4) The permittee shall burn only natural gas or No. 2 fuel oil in these emissions units.
- (5) The quality of the oil burned in these emissions units shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in b)(1)c.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas or No. 2 fuel oil, the permittee shall maintain and record the type and quantity of fuel burned in the emissions unit(s).
- (2) The permittee shall collect and record the following information each day for these emissions units:
  - a. the actual heat input for emissions unit B003, in mmBtu per hour;
  - b. the hours of operation for emissions unit B003;
  - c. the daily average operating rate, in mmBtu per hour, for emissions unit B003;
  - d. the total combined actual heat input for emissions units B004 and B005, in mmBtu per hour;
  - e. the total combined hours of operation for emissions units B004 and B005; and
  - f. the daily combined average operating rate, in mmBtu per hour, for emissions units B004 and B005.
- (3) The permittee shall collect and record the following information each month for emissions units B003, B004, and B005, combined:
  - a. the total amount of No. 2 fuel oil used, in gallons per month;
  - b. the total amount of natural gas used, in mmscf per month;
  - c. the updated rolling, 12-month summation of No. 2 fuel oil usage, in gallons (the total amount of gallons for the current month plus the total amount of gallons for the previous eleven calendar months);
  - d. the total NO<sub>x</sub> and SO<sub>2</sub> emissions for each month, in tons; and
  - e. the updated rolling, 12-month summation of the total NO<sub>x</sub> and SO<sub>2</sub> emissions, in tons (the total amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).
- (4) The permittee shall maintain records of the oil burned in these emissions units in accordance with either Alternative 1 or Alternative 2 described below:
  - a. Alternative 1:

For each shipment of oil received for burning in these emissions units, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by

single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in these emissions units for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving these emissions units on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as ASTM methods D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

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 notify the Hamilton County Department of Environmental Services in writing of any fuel combusted in these emissions units other than natural gas or No. 2 fuel oil. The notification shall include a copy of such record and shall be submitted to the Hamilton County Department of Environmental Services via the Air Services online web portal within 30 days after the deviation occurs.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. any exceedance of the allowable sulfur dioxide emission limitation, in pound per mmBtu of actual heat input, as specified in b)(1)c.;
  - b. any exceedance of the daily average operating rate limitations as specified in c)(1) and c)(2);
  - c. any exceedance of the rolling, 12-month No. 2 fuel oil operational restriction as specified in c)(3); and

- d. any exceedance of the rolling, 12-month emission limitations for NO<sub>x</sub> and SO<sub>2</sub> as specified in b)(1)d.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services 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.
- (5) The permittee shall submit annual reports that specify the total NO<sub>x</sub> and SO<sub>2</sub> emissions from emissions units B003, B004, and B005 for the calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for these emissions units in the annual Fee Emission Report.

f) Testing Requirements

- (1) Compliance with the Emission Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with the stack visible particulate emission limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

- b. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.020 pound per mmBtu of actual heat input when combusting natural gas or No. 2 fuel oil.

Applicable Compliance Method:

Compliance shall be based upon the US EPA AP-42 Fifth Edition, Table 1.4-2 (revised 7/1998) emission factor for PE (filterable) of 0.0019 pound per mmBtu for natural gas and Table 1.3-1 (revised 5/2010) emission factor for PE (filterable) of 0.014 pound per mmBtu for distillate oil.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 5.

**Draft Permit-to-Install and Operate**

Mohawk Fine Papers Inc - Beckett Mill

**Permit Number:** P0107770

**Facility ID:** 1409040014

**Effective Date:** To be entered upon final issuance

c. Emission Limitation:

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.29 pound per mmBtu of actual heat input when combusting No. 2 fuel oil.

Applicable Compliance Method:

Continuous compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received, or each daily composite sample of the oil burned during each calendar day, meets the limitation pursuant to the record keeping in d)(4).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

d. Emission Limitations:

Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 99.5 tons per year (TPY) as a rolling, 12-month summation, from emissions units B003, B004, and B005, combined, when combusting natural gas or No. 2 fuel oil.

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 30.6 tons per year (TPY) as a rolling, 12-month summation, from emissions units B003, B004, and B005, combined, when combusting natural gas or No. 2 fuel oil.

Applicable Compliance Method:

Compliance with the NO<sub>x</sub> and SO<sub>2</sub> emission limitations shall be demonstrated by the record keeping requirements required in d)(3).

(2) Compliance with the No. 2 fuel oil restriction in c)(3) shall be demonstrated by the record keeping required in d)(3).

g) Miscellaneous Requirements

(1) None.