



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL  
BUTLER COUNTY**

**CERTIFIED MAIL**

Street Address:

50 West Town Street, Suite 700

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 14-05962**

**Fac ID: 1409040212**

**DATE: 1/31/2008**

SMART Papers Holdings LLC  
Phillip Spotts  
601 North B Street  
Hamilton, OH 45013

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

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

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

HCDES



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**Permit To Install  
Terms and Conditions**

**Issue Date: 1/31/2008  
Effective Date: 1/31/2008**

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**FINAL PERMIT TO INSTALL 14-05962**

Application Number: 14-05962  
Facility ID: 1409040212  
Permit Fee: **\$3250**  
Name of Facility: SMART Papers Holdings LLC  
Person to Contact: Phillip Spotts  
Address: 601 North B Street  
Hamilton, OH 45013

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**601 North B St  
Hamilton, Ohio**

Description of proposed emissions unit(s):  
**Increase Utilization of Boilers for Cogeneration Expansion Project.**

The above named entity is hereby granted a Permit to Install for the above described emissions unit(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 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

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Chris Korleski  
Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

#### 1. Monitoring and Related Recordkeeping 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:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. 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:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, 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 appropriate Ohio EPA District Office or local air agency. 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 B.9 below if no deviations occurred during the quarter.

- iii. 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 appropriate Ohio EPA District Office or local air agency 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.
  - iv. If this permit is for an emissions unit located at a Title V facility, then 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.

## 2. 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 appropriate Ohio EPA District Office or local air agency 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).

## 3. 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.

**4. 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.

**5. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

**6. 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
- 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.

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**Facility ID: 1409040212**

## **7. 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.

## **8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any 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. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

## **9. Compliance Requirements**

- a. 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.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. 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.
  - ii. 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.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. 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.

#### 10. Permit-To-Operate Application

- a. If 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).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

#### 11. 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.

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**12. 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.

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### **13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

## **B. State Only Enforceable Permit-To-Install General Terms and Conditions**

### **1. Compliance Requirements**

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.

### **2. 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 appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (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 appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **3. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder.

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The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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**4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing 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 modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

**5. Construction of New Sources(s)**

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.

**6. 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.

**7. 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).

**8. Construction Compliance Certification**

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If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

**9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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.

**C. Permit-To-Install Summary of Allowable Emissions**

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each contaminant source identified in this permit.

SUMMARY (for informational purposes only)  
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	320
PM10	193
PM2.5	193
SO2	4489
NOx	1189
CO	407
VOC	8.9

**SMART Papers Holdings LLC**  
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## **Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

### **A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

#### **1. MACT REQUIREMENTS**

The permittee may be subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, 40 CFR Part 63, Subpart DDDDD. U.S. EPA initially promulgated these standards on September 13, 2004, with a compliance date of September 13, 2007. On July 30, 2007, these standards were vacated by mandate of the U.S. Court of Appeals for the District of Columbia Circuit. Until such time as a MACT determination is established for affected sources in this category, the permittee shall comply with the Ohio Air Toxics Policy, pursuant to ORC 3704.03(F), for applicable emissions units in this category, as specified in Part III, Section B, of this permit.

### **B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (B010) - 420 mmBtu/hr pulverized-dry bottom coal-fired boiler, with No. 2 fuel oil burners for ignition and supplemental firing - NSR Major Modification**

<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
OAC rule 3745-31-05(A)(3)	Exempt. See term and condition A.I.2.b.
OAC rules 3745-31-10 through 3745-31-20  Prevention of Significant Deterioration	See term and condition A.I.2.a.
OAC Chapter 3745-14  Nitrogen Oxides (NOx) Budget Trading Program	See term and condition A.I.2.d. through A.I.2.aa.
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
OAC rule 3745-17-10(C)(1)	Particulate emissions (PE) shall not exceed 0.11 pound per mmBtu of actual heat input.
OAC rule 3745-18-15(L)	Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 1.7 pounds per mmBtu of actual heat input.
OAC Chapter 3745-103  Acid Rain Permits and Compliance	See term and condition A.II.1. Exempt. See terms and conditions A.I.2.c and A.III.1.

**2. Additional Terms and Conditions**

Emissions Unit ID: B010

- 2.a** The maximum allowable SO<sub>2</sub> emissions rate of this emissions unit will not cause or contribute to a violation of a National Ambient Air Quality Standard (NAAQS) and/or Prevention of Significant Deterioration (PSD) increment based upon the permittee's air dispersion modeling information submitted on September 26, 2007, to Ohio EPA.
- 2.b** This emissions unit is exempt from the best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) since it is an existing emission unit that is not undergoing a physical change or a change in the method of operation as a result of this NSR major modification project and there is no increase in allowable emission limitations as a result of this permitting action.
- 2.c** This emissions unit is exempt from the acid rain program requirements in OAC Chapter 3745-103 pursuant to the gross electric sales exemption threshold for a cogeneration facility specified in OAC rule 3745-103-02(B)(4)(b). The permittee shall maintain records as specified in Section A.III.1 to demonstrate compliance with the following exemption threshold:
- i. average annual electric sales to the utility power distribution system shall not exceed more than one-third of potential electrical output capacity; or
  - ii. actual electric output (on a gross basis) shall not exceed 219,000 MWe-hours.
- 2.d** Office of Regulatory Information System Facility Code - 50247
- 2.e** This regulated non-electrical generating emissions unit is subject to the applicable requirements specified in OAC Chapter 3745-14 and the annual NO<sub>x</sub> allowance allocation listed below:

Annual Allowance for  
Calendar Years  
2004 through 2007

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Pursuant to OAC rule 3745-14-05(B)(2), the annual NO<sub>x</sub> allowance allocations for this emissions unit for calendar years 2008 through 2012 will be established in accordance with OAC rules 3745-14-05(C)(1) and 3745-14-05(C)(2).

\* The annual allowance and calendar years will be updated in the Title V permit to reflect the current years and allowance.

- 2.f** This emissions unit is identified as a NO<sub>x</sub> budget unit under OAC rule 3745-14-

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01(C)(1).

(Authority for term: OAC rule 3745-14-01(C)(1)(a)(i))

- 2.g** The NOx authorized account representative shall submit a complete NOx budget permit application in accordance with the deadlines specified in paragraphs (B)(2) and (B)(3) of OAC rule 3745-14-03. The NOx authorized account representative shall also submit, in a timely manner, any supplemental information that the Director determines is necessary in order to review a NOx budget permit application and issue or deny a NOx budget permit.

(Authority for term: OAC rules 3745-14-01(E)(1)(a)(i), 3745-14-01(E)(1)(a)(ii), and 3745-14-03(B)(1))

- 2.h** Beginning May 31, 2004, the owners and operators of each NOx budget source and each NOx budget unit at the source shall hold NOx allowances available for compliance deductions under paragraph (E) of OAC rule 3745-14-06, as of the NOx allowance transfer deadline, in the unit's compliance account and the source's overdraft account in an amount not less than the total NOx emissions for the control period from the unit, as determined in accordance with OAC rule 3745-14-08, plus any amount necessary to account for actual utilization under paragraph (C)(5) of OAC rule 3745-14-05 for the control period.

(Authority for term: OAC rules 3745-14-01(E)(3)(a) and 3745-14-01(E)(3)(c))

- 2.i** NOx allowances shall be held in, deducted from, or transferred among NOx allowance tracking system accounts in accordance with OAC rules 3745-14-05, 3745-14-06, 3745-14-07, and 3745-14-09.

(Authority for term: OAC rule 3745-14-01(E)(3)(d))

- 2.j** A NOx allowance shall not be deducted, in order to comply with the requirement under paragraph (E)(3)(a) of OAC rule 3745-14-01, for a control period in a year prior to the year for which the NOx allowance was allocated.

(Authority for term: OAC rule 3745-14-01(E)(3)(e))

- 2.k** Each ton of NOx emitted in excess of the NOx budget emission limitation, as defined in OAC rule 3745-14-01(B)(2)(yy), shall constitute a separate violation of OAC Chapter 3745-14, the Clean Air Act, and applicable Ohio law. The owners

Emissions Unit ID: B010

and operators of a NOx budget unit that has excess emissions in any control period shall surrender the NOx allowances required for deduction under paragraph (E)(4)(a) of OAC rule 3745-14-06 and pay any fine, penalty, or assessment or comply with any other remedy imposed under paragraph (E)(4)(c) of OAC rule 3745-14-06.

(Authority for term: OAC rules 3745-14-01(E)(3)(b), 3745-14-01(E)(4)(a) and 3745-14-01(E)(4)(b))

- 2.i** When recorded by the Administrator pursuant to OAC rules 3745-14-06 and 3745-14-07, every allocation, transfer, or deduction of a NOx allowance to or from a NOx budget unit's compliance account or the overdraft account of the source where the unit is located is deemed to amend automatically, and become a part of, any NOx budget permit of the NOx budget unit by operation of law without any further review.

(Authority for term: OAC rule 3745-14-01(E)(3)(h))

- 2.m** Except as provided below, the Director shall revise the NOx budget permit, as necessary, in accordance with OAC rule 3745-77-08.

Each NOx budget permit is deemed to incorporate automatically the definitions of terms under paragraph (B) of OAC rule 3745-14-01 and, when recorded by the Administrator, in accordance with OAC rules 3745-14-06 and 3745-14-07, every allocation, transfer, or deduction of a NOx allowance to or from the compliance accounts of the NOx budget units covered by the permit or the overdraft account of the NOx budget source covered by the permit.

(Authority for term: OAC rules 3745-14-03(D)(2) and 3745-14-03(E)(1))

- 2.n** The owner or operator of a NOx budget unit shall comply with the prohibitions under OAC rule 3745-14-08(A)(5).

(Authority for term: OAC rule 3745-14-08(A)(5))

- 2.o** The owners and operators of the NOx budget unit shall keep on site at the source each of the following documents for a period of five years from the date the document is created (this period may be extended for cause, at any time prior to the end of five years, in writing by the Director or Administrator):

i. the account certificate of representation for the NOx authorized account representative for the NOx budget unit and all documents that demonstrate the truth of the statements in the account certificate of representation, in accordance with paragraph (D) of OAC rule 3745-14-02, provided that the certificate and documents shall be retained on site at the source beyond such five-year period until such documents are superseded because of the submission of a new

**Issued: 1/31/2008**

account certificate or representation changing the NOx authorized account representative;

ii. all emission monitoring information, in accordance with OAC rule 3745-14-08;

iii. copies of all reports, compliance certifications, and other submissions and all records made or required under the NOx budget trading program; and

iv. copies of all documents used to complete a NOx budget permit application and any other submission under the NOx budget trading program or to demonstrate compliance with the requirements of the NOx budget trading program.

(Authority for term: OAC rule 3745-14-01(E)(5)(a)(i) through (iv))

- 2.p** The permittee shall operate and maintain equipment to continuously monitor and record nitrogen oxides emissions from these emissions units in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software. This includes all systems required to monitor the NOx emission rate, NOx concentration, heat input rate, and stack flow rate, in accordance with 40 CFR Parts 75.71 and 75.72.

The permittee shall comply with the initial and re-certification procedures of 40 CFR Part 75. The permittee shall maintain on-site documentation from the USEPA or the Ohio EPA that the continuous nitrogen oxides monitoring system has been certified in accordance with 40 CFR Part 75. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous nitrogen oxides monitoring system: emissions of nitrogen oxides in lb/mmBtu actual heat input on an hourly average basis, emissions of nitrogen oxides in lbs/hr, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

Emissions Unit ID: B010

Whenever the monitoring system fails to meet the quality assurance or data validation requirements of 40 CFR Part 75, data shall be substituted using the applicable procedures in Subpart D, Appendix D, or Appendix E of 40 CFR Part 75.

(Authority for term: OAC rules 3745-14-01(E)(2)(a), 3745-14-01(E)(5)(a)(ii), 3745-14-08(A)(2)(a) through (A)(2)(d), 3745-14-08(B)(1), and 3745-14-08(C)(1))

- 2.q** The permittee shall comply with the monitoring plan requirements of 40 CFR Part 75.62, except that the monitoring plan shall also include all of the information required by Subpart H of 40 CFR Part 75.

(Authority for term: OAC rule 3745-14-08(E)(2)(a))

- 2.r** The NOx authorized account representative of the NOx budget unit shall submit the reports and compliance certifications required under the NOx budget trading

program, including those under OAC rules 3745-14-04 and 3745-14-08, to the Director and Administrator.

(Authority for term: OAC rule 3745-14-01(E)(5)(b))

- 2.s** Each submission under the NOx budget trading program shall be submitted, signed, and certified by the NOx authorized account representative for each NOx budget source on behalf of which the submission is made. Each such submission shall include the following certification statement by the NOx authorized account representative:

"I am authorized to make this submission on behalf of the owners and operators of the NOx budget sources or NOx budget units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

If the NOx authorized account representative for a NOx budget unit subject to an acid rain emission limitation who signed and certified any submission that is made under Subpart F or G of 40 CFR Part 75 and which includes data and information required under OAC rule 3745-14-08 or Subpart H of 40 CFR Part 75 is not the same person as the designated representative or the alternate designated representative for the unit under 40 CFR Part 72, then the

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submission shall also be signed by the designated representative or the alternate designated representative.

(Authority for term: OAC rules 3745-14-02(A)(5) and 3745-14-08(E)(1)(b))

- 2.t** The NOx authorized account representative shall submit quarterly reports that include all of the data and information required in Subpart H of 40 CFR Part 75 for each NOx budget unit (or group of units using a common stack) and the data and information in Subpart G of 40 CFR Part 75. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30 and October 30 of each year and shall be submitted in the manner specified in Subpart H of 40 CFR Part 75 and 40 CFR Part 75.64.

(Authority for term: OAC rules 3745-14-08(E)(4)(a) and 3745-14-08(E)(4)(c)(i))

- 2.u** The NOx authorized account representative shall submit to the Administrator a compliance certification in support of each quarterly report based on a reasonable inquiry of those persons with primary responsibility for ensuring that all of the unit's emissions are correctly and fully monitored. The compliance certification shall state that:
- i. the monitoring data submitted were recorded in accordance with the applicable requirements of OAC rule 3745-14-08 and 40 CFR Part 75, including the quality assurance procedures and specifications; and
  - ii. for a unit with add-on NOx emission controls and for all hours where data are substituted in accordance with 40 CFR Part 75.34(a)(1), the add-on emission control were operating within the range of parameters listed in the quality assurance program under Appendix B of 40 CFR Part 75 and the substitute values do not systematically underestimate the NOx emissions.

(Authority for term: OAC rule 3745-14-08(E)(4)(d)(i) and (ii))

- 2.v** The NOx authorized account representative for a NOx budget unit shall submit written notice of monitoring system certification and re-certification test dates to the Director and the Administrator in accordance with 40 CFR Part 75.61. The NOx authorized account representative shall submit a certification application to the Administrator, U.S. EPA, Region V Office, and the Director within forty-five days after completing all initial or re-certification tests required under paragraph (B) of OAC rule 3745-14-08, including the information required under Subpart H

Emissions Unit ID: B010

of 40 CFR Part 75.

(Authority for term: OAC rules 3745-14-08(D) and 3745-14-08(E)(3))

- 2.w** For each control period in which one or more NOx budget units at a source are subject to the NOx budget emission limitation, the NOx authorized account representative of the source shall submit to the Director and the Administrator, by November 30 of that year, a compliance certification report for each source covering all such units.

The NOx authorized account representative shall include the following elements in the compliance certification report, in a format prescribed by the Administrator, concerning each unit at the source and subject to the NOx budget emission limitation for the control period covered by the report:

- i. identification of each NOx budget unit;
- ii. at the NOx authorized account representative's option, the serial numbers of the NOx allowances that are to be deducted from each unit's compliance account under paragraph (E) of OAC rule 3745-14-06 for the control period;
- iii. at the NOx authorized account representative's option, for units sharing a common stack and having NOx emissions that are not monitored separately or apportioned in accordance with OAC rule 3745-14-08, the percentage of allowances that is to be deducted from each unit's compliance account under paragraph (E)(5) of OAC rule 3745-14-06; and
- iv. the compliance certification under paragraph (A)(3) of OAC rule 3745-14-04.

(Authority for term: OAC rules 3745-14-04(A)(1) and 3745-14-04(A)(2))

- 2.x** In the compliance certification report under Section **A.I.2.w.iv** above, the NOx authorized account representative shall certify, based upon reasonable inquiry of those persons with the primary responsibility for operating the source and the NOx budget units at the source in compliance with the NOx budget trading program, whether each NOx budget unit for which the compliance certification is submitted was operated during the calendar year covered by the report in compliance with the requirements of the NOx budget trading program applicable to the unit, including all the following:

- i. whether the unit was operated in compliance with the NOx budget emission limitation;
- ii. whether the monitoring plan that governs the unit has been maintained to reflect the actual operation and monitoring of the unit, and contains all information necessary to attribute NOx emissions to the unit, in accordance with

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OAC rule 3745-14-08;

iii. whether all the NOx emissions from the unit, or group of units (including the unit) using a common stack, were monitored or accounted for through the missing data procedures and reported in the quarterly monitoring reports, including whether conditional data were reported in the quarterly reports in accordance with OAC rule 3745-14-08, and if conditional data were reported, the permittee shall indicate whether the status of all conditional data has been resolved and all necessary quarterly report submissions have been made; and

iv. whether the facts that form the basis for certification under OAC rule 3745-14-08 of each monitor at the unit or group of units (including the unit) using a common stack, or for using an excepted monitoring method or alternative monitoring method approved under OAC rule 3745-14-08, if any, have changed.

If a change is required to be reported under Section **A.1.2.x.iv** above, specify the nature of the change, the reason for the change, when the change occurred, and how the unit's compliance status was determined subsequent to the change, including what method was used to determine emissions when a change mandated the need for monitor re-certification.

(Authority for term: OAC rule 3745-14-04(A)(3))

- 2.y** The emission measurements recorded and reported in accordance with OAC rule 3745-14-08 shall be used to determine compliance by the unit with the NOx budget emission limitation under paragraph (E)(3) of OAC rule 3745-14-01.

(Authority for term: OAC rule 3745-14-01(E)(2)(b))

- 2.z** The permittee shall develop and maintain a written quality assurance/quality control plan for each continuous NOx monitoring system designed to ensure continuous valid and representative readings of NOx emissions in units of the applicable standard. The plan shall follow the requirements of 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous NOx monitoring system must be kept on-site and available for inspection during regular office hours.

(Authority for term: OAC rules 3745-14-08(A)(2)(c) and 3745-14-08(A)(2)(d))

- 2.aa** The NOx authorized account representative shall submit a complete NOx budget permit renewal application for the NOx budget source covering the NOx budget units at the source in accordance with paragraph (E) of OAC rule 3745-77-08.

(Authority for term: OAC rule 3745-14-03(B)(3)(a))

## II. Operational Restrictions

**Issued: 1/31/2008**

1. The total combined daily average operating rate for emissions units B010 and B020 shall not exceed 603 mmBtu per hour.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain annual records, on a calendar year basis, of the following information to demonstrate that this emissions unit is not an affected unit under the acid rain program:
  - a. the potential electrical output capacity of emissions units B010 and B020;
  - b. the average electric sales to the utility power distribution system;
  - c. the percentage of average electric sales as compared to the potential electrical output capacity; and
  - d. the total actual electric output (on a gross basis), in MWe-hours.
2. This permittee shall collect or require the coal supplier to collect a representative sample of coal for each shipment of coal which is received for burning in this emissions unit. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each month, the representative samples of coal from all shipments of coal which were received during that month shall be combined into one composite sample. This combination may be a physical composite or a weighted average of the test data for the individual shipments.

Each monthly composite sample of coal shall be analyzed for sulfur content (percent) and heat content (Btu/pound of coal). The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the most recent version of the following ASTM methods: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865, Gross Calorific Value of Coal and Coke. Alternative, equivalent methods may be used upon written approval from the Hamilton County Department of Environmental Services.

3. The permittee shall maintain monthly records of the total quantity of coal burned, the results of the analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in pounds per mmBtu), for all shipments of coal during each calendar month. The sulfur dioxide emission rate is based upon a volume-weighted

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average as calculated per the equation in OAC rule 3745-18-04(F)(1).

4. The permittee shall maintain daily records of the total combined heat input, total combined hours of operation (calculated by the sum of the operating hours for each unit), and the daily average operating rate, in mmBtu per hour, for emissions units B010 and B020. To determine the heat input, the permittee shall continuously monitor and record the steam flow rate from this emissions unit.
5. The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of particulate emissions from the common stack serving B010 and B020. The opacity of the visible particulate emissions from B010 and B020 shall be monitored in the combined stack for the two boilers and the visible particulate emission limitation specified in Section A.I.1 applies to each individual boiler as monitored at the common stack. An exceedance of the visible emissions limitation in Section A.I.1 as measured at the common stack does not necessarily constitute an exceedance of the emissions limitation for both boilers. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of data obtained by the continuous opacity monitoring system including, but not limited to:

- a. percent opacity on an instantaneous (one-minute) and 6-minute block average basis;
  - b. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
  - c. hours of operation of the emissions unit, continuous opacity monitoring system, and control equipment;
  - d. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous opacity monitoring system;
  - e. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous opacity monitoring system; as well as,
  - f. the reason (if known) and the corrective actions taken (if any) for each such event in (d) and (e).
6. The permittee shall maintain on-site, the document of certification received from the U.S. EPA or the Ohio EPA's Central Office verifying that the continuous opacity monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter/document of certification shall be made available to the director (the appropriate Ohio EPA District Office or local air agency) upon request.

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Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

7. To obtain an exemption pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain temperature monitors and recorders that measure and record the temperature of the boiler exhaust gases entering the ESPs during (a) all periods of start-up until the ESPs are operational or until the inlet temperatures of the ESPs achieve the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b) all periods of shutdown until the inlet temperatures of the ESPs drop below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i). An electronic or hardcopy record of the temperatures during periods of start-up and shutdown shall be maintained.

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

8. The permittee shall maintain the following records for emissions units B010, B020, F003, P019, and all de minimus emissions units (i.e. cooling tower) associated with the Cogeneration Expansion Project, as described in the Permit to Install (PTI) application 14-05962, submitted July 20, 2007, in order to demonstrate that the Cogeneration Expansion Project does not trigger major modification for PE, PM10/PM2.5, NO<sub>x</sub>, CO, and VOC:
  - a. the projected actual annual emissions for PE, PM10/PM2.5, NO<sub>x</sub>, CO, and VOC, in tons per year, from the Cogeneration Expansion Project as submitted in PTI application 14-05962 on July 20, 2007; and
  - b. the total actual annual emissions of PE, PM10/PM2.5, NO<sub>x</sub>, CO, and VOC, in tons per year, from emission units B010, B020, F003, P019, and all de minimus emissions units (i.e. cooling tower) associated with the Cogeneration Expansion Project, combined, for the 5 calendar years after commencing operation of the Cogeneration Expansion Project.

#### **IV. Reporting Requirements**

Emissions Unit ID: B010

1. The permittee shall submit quarterly reports on the quality and quantity of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
  - a. the total quantity of coal received (tons);
  - b. the average ash content (percent) of the coal received;
  - c. the average sulfur content (percent) of the coal received;
  - d. the average heat content (Btu/pound) of the coal received; and
  - e. the average sulfur dioxide emission rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received.

Compliance with the sulfur dioxide emission limit shall be determined each month by calculating the average monthly sulfur dioxide emission rate, using the results of the analyses of the monthly composite sample for sulfur content and heat content.

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

2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify each exceedance of the total combined operating rate limitation specified in Section A.II.1.

The quarterly deviation reports shall be submitted in accordance with Section A.1.c.ii of the General Terms and Conditions in this permit.

3. The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous opacity monitoring system:
  - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, OAC rule 3745-17-07, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. If there are no exceedances during the calendar quarter, the permittee shall submit a statement to that effect.

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- b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
  - i. the facility name and address;
  - ii. the manufacturer and model number of the continuous opacity monitor;
  - iii. the location of the continuous opacity monitor;
  - iv. the exceedance report as detailed in (a) above;
  - v. the total operating time (hours) of the emissions unit;
  - vi. the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;
  - vii. the date, time, and duration of any/each malfunction\* of the continuous opacity monitoring system, emissions unit, and/or control equipment;
  - viii. the date, time, and duration of any downtime\* of the continuous opacity monitoring system and/or control equipment while the emissions unit was in operation; and
  - ix. the reason (if known) and the corrective actions taken (if any) for each event in (b)(vii) and (viii).

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

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

4. The permittee shall notify the Hamilton County Department of Environmental Services in writing if in any three calendar year period this unit sells to a utility power distribution system an annual average of more than one-third of its potential electrical output capacity and more than 219,000 MWe-hours actual electric output (on a gross basis). This notification shall identify the cause for the exceedance and the estimated gross sales in MWe-hours and as a percentage of potential electrical capacity. This notification shall be submitted to the Hamilton County Department of Environmental

Emissions Unit ID: B010

Services within 60 days after the end of such three calendar year period.

5. The permittee shall notify the Hamilton County Department of Environmental Services in writing if annual emissions from all emissions units in the Cogeneration Expansion Project, as specified in Section A.III.8, result in a significant PE, PM10/PM2.5, NOx, CO, and/or VOC emissions increase and exceed the projected actual PE, PM10/PM2.5, NOx, CO, and VOC emissions contained in PTI application 14-05962, submitted July 20, 2007. This notification shall identify the cause for the significant emissions increase and the estimated PE, PM10/PM2.5, NOx, CO, or VOC emissions. This notification shall be submitted to the Hamilton County Department of Environmental Services within 60 days after the end of such year.

## V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.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:

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

- b. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.11 pound per mmBtu of actual heat input.

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the particulate emission testing required in term and condition A.V.2 below.

- c. Emission Limitation:

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 1.7 pounds per mmBtu of actual heat input.

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Applicable Compliance Method:

Compliance shall be determined by using the fuel analysis records required pursuant to terms and conditions A.III.2 and A.III.3 and the applicable equation in OAC rule 3745-18-04(F).

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. the emission testing shall be conducted within 6 months after completion of steam turbine installation and modification as described in the Cogeneration Expansion Project identified in this permit to install; unless otherwise approved by Hamilton County Department of Environmental Services to coincide with the required periodic testing pursuant to the terms and conditions for this emissions unit contained in the permittee's Title V Operating Permit;
  - b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates;
  - c. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9); and
  - d. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity.
  - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).
  - f. Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the

Emissions Unit ID: B010

emissions from the emissions unit and/or the performance of the control equipment.

- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report. The request may be granted, where warranted, if submitted prior to testing and with prior approval from the Hamilton County Department of Environmental Services.

## VI. Miscellaneous Requirements

1. The permittee's proposed Cogeneration Expansion Project includes the installation of new steam turbine generators and planned refinements to existing steam turbine generators in order to expand electrical generating capacity at the facility. The steam turbine generators are not sources of regulated air contaminants; therefore they are not identified as emissions units subject to regulation in this permitting action. However, the increase in electrical generating capacity results in debottlenecking and/or utilization increases of several existing emissions units at the facility. As a result, the projected SO<sub>2</sub> actual emissions increases from the existing coal-fired boilers, emissions units B010 and B020, as described in air PTI application number 14-05962 submitted on July 20, 2007, triggered the definition of significant increase and significant net emission increase as defined in OAC rule 3745-31-01(III); therefore, emissions units B010 and B020 were subject to PSD review under New Source Review (NSR) major modification requirements in this permitting action.

The permittee provided a PSD Assessment and Modeling Analysis for the existing coal-fired boilers with air PTI application number 14-05962, submitted on July 20, 2007, and revised on September 26, 2007. The SO<sub>2</sub> emission increases from the boilers do not exceed the existing allowable emission limitations which demonstrate compliance with the PSD requirements, OAC rules 3745-31-10 through 3745-31-20.

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (B010) - 420 mmBtu/hr pulverized-dry bottom coal-fired boiler, with No. 2 fuel oil burners for ignition and supplemental firing - NSR Major Modification**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**SMART Papers Holdings LLC**  
DTI Application: 11-05062

**Facility ID: 1409040212**

Emissions Unit ID: B010

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (B020) - 249 mmBtu/hr spreader stoker coal-fired boiler - NSR Major Modification**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
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OAC rule 3745-31-05(A)(3)	<p>Particulate emissions (PE) shall not exceed 118 tons per year.</p> <p>Particulate matter 10 microns and less in diameter (PM10) and particulate matter 2.5 microns and less in diameter (PM2.5) shall not exceed 0.072 pound per mmBtu of actual heat input and 77.2 tons per year*.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 1854 tons per year.</p> <p>Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 163.5 pounds per hour and 716 tons per year*.</p> <p>Carbon monoxide (CO) emissions shall not exceed 51.0 pounds per hour and 223 tons per year*.</p> <p>Non-methane Organic Compound (NMOC) emissions shall not exceed 1.12 pounds per hour and 4.9 tons per year*.</p> <p>* The emission limitations outlined above are based on the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with these limitations.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(C), and OAC rule 3745-18-15(L).</p>
OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
OAC rule 3745-17-10(C)(1)	Particulate emissions (PE) shall not exceed 0.11 pound per mmBtu of actual heat input.
OAC rule 3745-18-15(L)	<p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 1.7 pounds per mmBtu of actual heat input.</p> <p>See term and condition A.II.1.</p>
<p>OAC rules 3745-31-10 through 3745-31-20</p> <p>Prevention of Significant Deterioration</p>	See term and condition A.I.2.a.

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OAC Chapter 3745-103  Acid Rain Permits and Compliance	Exempt. See terms and conditions A.I.2.b and A.III.1.
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## 2. Additional Terms and Conditions

- 2.a** The maximum allowable SO<sub>2</sub> emissions rate of this emissions unit will not cause or contribute to a violation of a National Ambient Air Quality Standard (NAAQS) and/or Prevention of Significant Deterioration (PSD) increment based upon the permittee's air dispersion modeling information submitted on September 26, 2007, to Ohio EPA.
- 2.b** This emissions unit is exempt from the acid rain program requirements in OAC Chapter 3745-103 pursuant to the gross electric sales exemption threshold for a cogeneration facility specified in OAC rule 3745-103-02(B)(4)(b). The permittee shall maintain records as specified in Section A.III.1 to demonstrate compliance with the following exemption threshold:
- i. average annual electric sales to the utility power distribution system shall not exceed more than one-third of potential electrical output capacity; *or*
  - ii. actual electric output (on a gross basis) shall not exceed 219,000 MWe-hours.
- 2.c** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations and compliance with all applicable regulations, record keeping, and reporting required by this permit that are associated with the above OAC rule 3745-31-05(A)(3) limitations and requirements.

The above-specified emission limitations under OAC rule 3745-31-05(A)(3) represent existing best available technology (BAT) requirements established under the prior permitting actions for this emissions unit. Since this emissions unit is not undergoing a physical change or a change in the method of operation as a result of this NSR major modification project, there is no change to the allowable emission limitations previously established under BAT as a result of this permitting action.

## II. Operational Restrictions

Emissions Unit ID: B020

1. The total combined daily average operating rate for emissions units B010 and B020 shall not exceed 603 mmBtu per hour.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain annual records, on a calendar year basis, of the following information to demonstrate that this emissions unit is not an affected unit under the acid rain program:
  - a. the potential electrical output capacity of emissions units B010 and B020;
  - b. the average electric sales to the utility power distribution system;
  - c. the percentage of average electric sales as compared to the potential electrical output capacity; and
  - d. the total actual electric output (on a gross basis), in MWe-hours.
2. This permittee shall collect or require the coal supplier to collect a representative sample of coal for each shipment of coal which is received for burning in this emissions unit. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each month, the representative samples of coal from all shipments of coal which were received during that month shall be combined into one composite sample. This combination may be a physical composite or a weighted average of the test data for the individual shipments.

Each monthly composite sample of coal shall be analyzed for sulfur content (percent) and heat content (Btu/pound of coal). The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the most recent version of the following ASTM methods: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865, Gross Calorific Value of Coal and Coke. Alternative, equivalent methods may be used upon written approval from the Hamilton County Department of Environmental Services.

3. The permittee shall maintain monthly records of the total quantity of coal burned, the results of the analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in pounds per mmBtu), for all shipments of coal during each calendar month. The sulfur dioxide emission rate is based upon a volume-weighted average as calculated per the equation in OAC rule 3745-18-04(F)(1).
4. The permittee shall maintain daily records of the total combined heat input, total combined hours of operation (calculated by the sum of the operating hours for each unit), and the daily average operating rate, in mmBtu per hour, for emissions units B010 and B020. To determine the heat input, the permittee shall continuously monitor and record the steam flow rate from this emissions unit.

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5. The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of particulate emissions from the common stack serving B010 and B020. The opacity of the visible particulate emissions from B010 and B020 shall be monitored in the combined stack for the two boilers and the visible particulate emission limitation specified in Section A.I.1 applies to each individual boiler as monitored at the common stack. An exceedance of the visible emissions limitation in Section A.I.1 as measured at the common stack does not necessarily constitute an exceedance of the emissions limitation for both boilers. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of data obtained by the continuous opacity monitoring system including, but not limited to:

- a. percent opacity on an instantaneous (one-minute) and 6-minute block average basis;
  - b. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
  - c. hours of operation of the emissions unit, continuous opacity monitoring system, and control equipment;
  - d. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous opacity monitoring system;
  - e. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous opacity monitoring system; as well as,
  - f. the reason (if known) and the corrective actions taken (if any) for each such event in (d) and (e).
6. The permittee shall maintain on-site, the document of certification received from the U.S. EPA or the Ohio EPA's Central Office verifying that the continuous opacity monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter/document of certification shall be made available to the director (the appropriate Ohio EPA District Office or local air agency) upon request.

Emissions Unit ID: B020

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

7. To obtain an exemption pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain temperature monitors and recorders that measure and record the temperature of the boiler exhaust gases entering the ESPs during (a) all periods of start-up until the ESPs are operational or until the inlet temperatures of the ESPs achieve the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b) all periods of shutdown until the inlet temperatures of the ESPs drop below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i). An electronic or hardcopy record of the temperatures during periods of start-up and shutdown shall be maintained.

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

8. The permittee shall maintain the following records for emissions units B010, B020, F003, P019, and all de minimus emissions units (i.e. cooling tower) associated with the Cogeneration Expansion Project, as described in the Permit to Install (PTI) application 14-05962, submitted July 20, 2007, in order to demonstrate that the Cogeneration Expansion Project does not trigger major modification for PE, PM10/PM2.5, NOx, CO, and VOC:
  - a. the projected actual annual emissions for PE, PM10/PM2.5, NOx, CO, and VOC, in tons per year, from the Cogeneration Expansion Project as submitted in PTI application 14-05962 on July 20, 2007; and
  - b. the total actual annual emissions of PE, PM10/PM2.5, NOx, CO, and VOC, in tons per year, from emission units B010, B020, F003, P019, and all de minimus emissions units (i.e. cooling tower) associated with the Cogeneration Expansion Project, combined, for the 5 calendar years after commencing operation of the Cogeneration Expansion Project.

#### IV. Reporting Requirements

1. The permittee shall submit quarterly reports on the quality and quantity of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
  - a. the total quantity of coal received (tons);
  - b. the average ash content (percent) of the coal received;

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- c. the average sulfur content (percent) of the coal received;
- d. the average heat content (Btu/pound) of the coal received; and
- e. the average sulfur dioxide emission rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received.

Compliance with the sulfur dioxide emission limit shall be determined each month by calculating the average monthly sulfur dioxide emission rate, using the results of the analyses of the monthly composite sample for sulfur content and heat content.

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

- 2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services that identify each exceedance of the total combined operating rate limitation specified in Section A.II.1.

The quarterly deviation reports shall be submitted in accordance with Section A.1.c.ii of the General Terms and Conditions in this permit.

- 3. The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous opacity monitoring system:
  - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, OAC rule 3745-17-07, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. If there are no exceedances during the calendar quarter, the permittee shall submit a statement to that effect.

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- b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
- i. the facility name and address;
  - ii. the manufacturer and model number of the continuous opacity monitor;
  - iii. the location of the continuous opacity monitor;
  - iv. the exceedance report as detailed in (a) above;
  - v. the total operating time (hours) of the emissions unit;
  - vi. the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;
  - vii. the date, time, and duration of any/each malfunction\* of the continuous opacity monitoring system, emissions unit, and/or control equipment;
  - viii. the date, time, and duration of any downtime\* of the continuous opacity monitoring system and/or control equipment while the emissions unit was in operation; and
  - ix. the reason (if known) and the corrective actions taken (if any) for each event in (b)(vii) and (viii).

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

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

4. The permittee shall notify the Hamilton County Department of Environmental Services in writing if in any three calendar year period this unit sells to a utility power distribution system an annual average of more than one-third of its potential electrical output capacity and more than 219,000 MWe-hours actual electric output (on a gross basis). This notification shall identify the cause for the exceedance and the estimated gross sales in MWe-hours and as a percentage of potential electrical capacity. This notification shall be submitted to the Hamilton County Department of Environmental Services within 60 days after the end of such three calendar year period.
5. The permittee shall notify the Hamilton County Department of Environmental Services in writing if annual emissions from all emissions units in the Cogeneration Expansion Project, as specified in Section A.III.8, result in a significant PE, PM10/PM2.5, NOx, CO, and/or VOC emissions increase and exceed the projected actual PE, PM10/PM2.5, NOx, CO, and VOC emissions contained in

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air PTI number application 14-05962, submitted July 20, 2007. This notification shall identify the cause for the significant emissions increase and the estimated PE, PM10/PM2.5, NOx, CO, or VOC emissions. This notification shall be submitted to the Hamilton County Department of Environmental Services within 60 days after the end of such year.

**V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

Emissions Unit ID: B020

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:

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

b. Emission Limitations:

Particulate emissions (PE) shall not exceed 0.11 pound per mmBtu of actual heat input.

Particulate emissions (PE) shall not exceed 118 tons per year.

Applicable Compliance Method:

Compliance with the mass allowable emissions limitation in pound per mmBtu and the annual emission rate shall be demonstrated through the particulate emission testing required in term and condition A.V.2 below.

c. Emission Limitations:

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 1.7 pounds per mmBtu of actual heat input.

Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 1854 tons per year.

Applicable Compliance Method:

Compliance with the mass allowable emission limitation in pound per mmBtu and the annual emissions rate shall be determined by using the fuel analysis records required pursuant to terms and conditions A.III.2 and A.III.3 and the applicable equation in OAC rule 3745-18-04(F).

d. Emission Limitations:

Particulate matter 10 microns and less in diameter (PM<sub>10</sub>) and particulate matter 2.5 microns and less in diameter (PM<sub>2.5</sub>) shall not exceed 0.072 pound per mmBtu of actual heat input and 77.2 tons per year.

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Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 163.5 pounds per hour and 716 tons per year.

Carbon monoxide (CO) emissions shall not exceed 51.0 pounds per hour and 223 tons per year.

Non-methane Organic Compound (NMOC) emissions shall not exceed 1.12 pounds per hour and 4.9 tons per year.

Applicable Compliance Method:

The emission rates specified above are based upon the emissions unit's potential to emit. The emission rates were calculated using the permittee-supplied information, AP-42 emission factors, and emission testing data contained in air PTI number application 14-03948, submitted August 14, 1995 and revised February 16, 2000. Compliance shall be determined by emission factors found in US EPA AP-42 Section 1.1 (dated 9/98) or the permittee's most recent emissions test data.

If required, the permittee shall demonstrate compliance with the NO<sub>x</sub> emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

If required, the permittee shall demonstrate compliance with the CO emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

If required, the permittee shall demonstrate compliance with the NMOC emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

If required, the permittee shall demonstrate compliance with the PM<sub>10</sub>/PM<sub>2.5</sub> emission limitation through emission tests performed in accordance with 40 CFR Part 51, Appendix M, Methods 1 through 4 and 201.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. the emission testing shall be conducted within 6 months after completion of

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steam turbine installation and modification as described in the Cogeneration Expansion Project identified in this permit to install; unless otherwise approved by Hamilton County Department of Environmental Services to coincide with the required periodic testing pursuant to the terms and conditions for this emissions unit contained in the permittee's Title V Operating Permit;

- b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates;
- c. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9); and
- d. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).
- f. Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report. The request may be granted, where warranted, if submitted prior to testing and with prior approval from the Hamilton County Department of Environmental Services.

## VI. Miscellaneous Requirements

1. The terms and conditions in this permit to install shall supercede the terms and conditions for emissions unit B020 contained in PTI 14-03948, issued on April 25, 2006.
2. The permittee's proposed Cogeneration Expansion Project includes the installation of new steam turbine generators and planned refinements to existing steam turbine generators in order to expand electrical generating capacity at the facility. The steam turbine generators are not sources of regulated air contaminants; therefore they are not identified as emissions units subject to regulation in this permitting action. However, the increase in electrical generating capacity results in debottlenecking and/or utilization increases of several existing emissions units at the facility. As a result, the projected SO<sub>2</sub> actual emissions increases from the existing coal-fired boilers, emissions units B010 and B020, as described in air PTI application number 14-05962 submitted on July 20, 2007, triggered the definition of significant increase and significant net emission increase as defined in OAC rule 3745-31-01(III); therefore, emissions units B010 and B020 were subject to PSD review under New Source Review (NSR) major modification requirements in this permitting action.

The permittee provided a PSD Assessment and Modeling Analysis for the existing coal-fired boilers with air PTI application number 14-05962, submitted on July 20, 2007, and revised on September 26, 2007. The SO<sub>2</sub> emission increases from the boilers do not exceed the existing allowable emission limitations which demonstrate compliance with the PSD requirements, OAC rules 3745-31-10 through 3745-31-20.

3. This emissions unit was previously permitted to burn tire-derived fuel (TDF) in combination with coal. Prior to burning TDF in this emissions unit, the permittee shall submit an application to modify this permit to install. The application shall contain a revised netting determination for the Cogeneration Expansion Project that incorporates the use of TDF in this emissions unit, including a revised PSD Assessment and Modeling Analysis, if applicable.

Emissions Unit ID: B020

**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

**Operations, Property, and/or Equipment - (B020) - 249 mmBtu/hr spreader stoker coal-fired boiler - NSR Major Modification**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(F)	See Section B.III.1.

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

1. The permit to install for this emissions unit B020 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN3 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN3 (or other approved) model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: hydrogen chloride

TLV (ug/m3): 7458

Maximum Hourly Emission Rate (lbs/hr): 36.41

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 17.6

MAGLC (ug/m3): 178

Emissions Unit ID: B020

2. The above described evaluation determined that the maximum ground level concentration for the new or modified source was less than 80% of the MAGLC. Per ORC 3704.03(F)(4)(d), the owner or operator shall submit an annual report that describes any changes to the emissions unit that affect the air toxic modeling. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
  - a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs" ("Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices");
  - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
  - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

#### IV. Reporting Requirements

1. The permittee shall submit annual reports that describe any changes to this emissions unit which affect the air toxic modeling. If no changes were made during the year, then a report shall be submitted stating that no changes were made. This report is due by January 31 of each year and shall cover the previous calendar year.

#### V. Testing Requirements

None

#### VI. Miscellaneous Requirements

None

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05962 Facility ID: 1409040212

FACILITY NAME SMART Papers Holdings LLC

FACILITY DESCRIPTION Increase Utilization of Boilers for Cogeneration Expansion Project. CITY/TWP Hamilton

SIC CODE 2621 SCC CODE 1-02-002-02 EMISSIONS UNIT ID B010

EMISSIONS UNIT DESCRIPTION 420 mmBtu/hr pulverized-dry bottom coal-fired boiler, with No. 2 fuel oil burners for ignition and supplemental firing - NSR Major Modification

DATE INSTALLED 1928

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.009 lb/mmBtu	1.18	0.11 lb/mmBtu	202
PM <sub>10</sub>	nonattainment (as PM <sub>2.5</sub> )	0.063 lb/mmBtu	0.79		116
Sulfur Dioxide	attainment	1.23 lb/mmBtu	1330 (B010 and B020 combined)	1.7 lb/mmBtu	4489 (B010 and B020 combined)
Organic Compounds	nonattainment	0.93 lb/hr	2.6		4
Nitrogen Oxides	attainment	107.9 lbs/hr	299		473
Carbon Monoxide	attainment	42 lbs/hr	116		184
Lead	attainment	insig.			
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS?

NESHAP?

PSD? Y

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

**BAT not applicable. No physical change to emissions unit. No increase in allowable emissions.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$NA

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: NA

**NEW SOURCE REVIEW FORM B**

PTI Number: 14-05962 Facility ID: 1409040212

FACILITY NAME SMART Papers Holdings LLC

FACILITY DESCRIPTION Increase Utilization of Boilers for CITY/TWP Hamilton

Emissions Unit ID: B020

SIC CODE 2621 SCC CODE 1-02-002-04 EMISSIONS UNIT ID B020

EMISSIONS UNIT DESCRIPTION 249 mmBtu/hr spreader stoker coal-fired boiler - NSR Major Modification

DATE INSTALLED 1975

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.017 lb/mmBtu	0.07	0.11 lb/mmBtu	118
PM <sub>10</sub>	nonattainment (as PM <sub>2.5</sub> )	0.033 lb/mmBtu	0.07	0.072 lb/mmBtu	77
Sulfur Dioxide	attainment	1.23 lb/mmBtu	16.28	1.7 lb/mmBtu	1854
Organic Compounds	nonattainment	0.46 lb/hr	0.03	1.12 lbs/hr	4.9
Nitrogen Oxides	attainment	149.4 lbs/hr	8.57	163.5 lbs/hr	716
Carbon Monoxide	attainment	12 lbs/hr	0.52	51 lbs/hr	223
Lead	attainment	insig.		insig.	
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? **Y** OFFSET POLICY?

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**  
**BAT based on permittee-supplied information, AP-42, and emission test data from PTI application 14-03948. No change to previously established BAT limits in this permitting action. BAT for SO2 and PE equivalent to rule allowable limits.**

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? Yes

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$NA

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? X YES      NO

IDENTIFY THE AIR CONTAMINANTS: hydrogen chloride