

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **08-04315**

A. Source Description:

The four emissions units included in this permit are ovens used to cure paper used as oil filters. The paper contains hazardous air pollutants (HAPs) and organic compounds (OC). The ovens are vented to a regenerative thermal oxidizer control device.

B. Facility Emissions and Attainment Status:

Honeywell CPG, Fram Operations is located in Greenville, Darke County which is currently in attainment for all criteria pollutants. With the issuance of this synthetic minor permit and an additional synthetic minor PTI currently under review (PTI 08-04324), the facility-wide individual HAP emission rate will equal 9.57 TPY and the combined HAP emission rate will equal 22.20 TPY.

C. Source Emissions:

The uncontrolled emission rate from the four paper curing ovens, has the potential to exceed the HAP thresholds for major source Title V applicability. Therefore, the facility has requested a synthetic minor PTI to limit their HAP emissions below Title V thresholds, through the application of a thermal oxidizer control device. The terms and conditions of this permit will limit the facility-wide HAP emissions to below 9.9 TPY for an individual HAP and below 24.9 TPY for any combination of HAPs, based on a rolling 12-month summation.

D. Conclusion:

The uncontrolled HAP emission rate from this facility is greater than the Title V thresholds. This PTI is proposed for issuance with federally enforceable requirements to install, operate and maintain a regenerative thermal oxidizer control device for emissions units P047-P050. The facility HAP emission rates on an individual and combined basis will be less than the Title V thresholds with the issuance of this PTI, in conjunction with the issuance of federally enforceable limitations in PTI 08-04324. As such, this facility will be a minor operating facility and not subject to the Title V permitting requirements.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov. Center

**RE: DRAFT PERMIT TO INSTALL CERTIFIED MAIL
DARKE COUNTY
Application No: 08-04315**

DATE: 12/27/2001

Honeywell CPG Fram Corp
Timothy Collette
851 Jackson St
Greenville, OH 45331-1277

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA

RAPCA

Miami Valley Regional Planning Commission

IN



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 08-04315

Application Number: 08-04315
APS Premise Number: 0819070018
Permit Fee: **To be entered upon final issuance**
Name of Facility: Honeywell CPG Fram Corp
Person to Contact: Timothy Collette
Address: 851 Jackson St
Greenville, OH 45331-1277

Location of proposed air contaminant source(s) [emissions unit(s)]:

**851 Jackson St
Greenville, Ohio**

Description of proposed emissions unit(s):

4 paper cure ovens; chapter 31 replacing 08-03649 issued 12-3-97.

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

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 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 quarterly, i.e., 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. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction 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. 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 emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install 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.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance

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that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. 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.

11. 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).

12. 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.

13. Source Operation and Operating Permit Requirements After Completion of Construction

- 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

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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).

Emissions Unit ID: P047

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install 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 thirty (30) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

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

15. 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 this Permit to Install.

B. 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 air 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>
HAPs	5.95
Total OC, including HAPs	6.88
facility-wide individual HAPs	9.9
facility-wide combined HAPs	24.9

Hone

PTI

Emissions Unit ID: P047

Issued: To be entered upon final issuance

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P047 - Paper Curing Oven - 600 lbs/hr; Ov. 3001 with Regenerative Thermal Oxidizer; *Modification	OAC rule 3745-31-05 (A)(3)	Organic Compounds (OC): 0.78 lb/hr, 0.18 ton/month, 2.13 TPY The requirements of this rule also include compliance with the requirements of OAC 3745-21-07 (G)(6)(a).
	OAC rule 3745-35-07 (B) Synthetic Minor Title V	Reference A.2.b.
	OAC rule 3745-21-07 (G)(6)(a)	Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.
	OAC rule 3745-21-07 (G)(1)	The requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

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PTI
Issue

Facility ID: 0819070018

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- 2.b** The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

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Emissions Unit ID: **P047**

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B. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1650 degrees Fahrenheit.
2. The maximum paper usage rate for this emissions unit shall not exceed 273,750 lbs/month or 3,285,000 lbs/year, based on rolling, 12-month summations.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1650 degrees Fahrenheit.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall collect and record the paper usage rate, in pounds, each month for this emissions unit.
 3. The permittee shall collect and record the following information each month for the entire facility.
 - a. The total individual Hazardous Air Pollutant (HAP)* emission rate, in tons per month, for each HAP employed at this facility.
 - b. The total combined HAP emission rate, in tons per month, for all of the HAPs employed at this facility.
 - c. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.

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PTI /

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- d. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

*A listing of the HAPs can be found in Section 112 (b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local agency contact. This information does not have to be kept on a line-by-line basis.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:
 - a. the paper usage limitations;
 - b. the individual facility HAP limitation; and
 - c. the combined facility HAP limitation.
3. The permittee shall submit all reports required by this permit in accordance with the general terms and condition A.2.
4. The permittee shall submit annual reports which specify the individual HAP emission rate and the combined HAP emission rate from this facility. These reports shall be submitted to the Director (appropriate Ohio EPA District Office or local air agency) by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation-
0.78 lb/hr OC

Applicable Compliance Method-
Compliance with this emissions limitation shall be based upon the following:
 - i. Multiply the maximum paper usage of 600 lbs/hr by the emission factor of 1.35 x

Emissions Unit ID: P047

10^{-4} lb formaldehyde/lb paper, as derived from the December, 1999 stack test.

- ii. Multiply the maximum paper usage of 600 lbs/hr by the emission factor of 2.865×10^{-4} lb phenol/lb paper, as derived from the December, 1999 stack test.
- iii. Multiply the maximum paper usage of 600 lbs/hr by the emission factor of 6.975×10^{-4} lb methanol/lb paper, as derived from the December, 1999 stack test.
- iv. Multiply the maximum paper usage of 600 lbs/hr by the emission factor of 1.75×10^{-4} lb isopropanol/lb paper, as derived from the December, 1999 stack test.
- v. Sum the products from i. through iv., for the total hourly OC emission rate in pounds.

- b. Emission Limitation-
0.18 ton/month OC

Applicable Compliance Method-

Compliance with this emissions limitation shall be based upon the following:

- i. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 1.35×10^{-4} lb formaldehyde/lb paper, as derived from the December, 1999 stack test.
- ii. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 2.865×10^{-4} lb phenol/lb paper, as derived from the December, 1999 stack test.
- iii. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 6.975×10^{-4} lb methanol/lb paper, as derived from the December, 1999 stack test.
- iv. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 1.75×10^{-4} lb isopropanol/lb paper, as derived from the December, 1999 stack test.
- v. Sum the products from i. through iv., in lbs OC/month, for each month and divide by 2000 lbs/ton.

- c. Emission Limitation-
2.13 TPY OC

Applicable Compliance Method-

Compliance with this emissions limitation shall be based upon record keeping in Section C.2. and shall be the sum of the 12-monthly limits, in lbs, divided by 2000 lbs/ton.

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- d. Compliance with the facility wide HAP emission limitations in Section A.2.b. shall be demonstrated by the record keeping required in Section C.3.

F. Miscellaneous Requirements

1. In accordance with OAC rule 3745-35-07, the following terms in this permit are federally enforceable: A.2.b., C.3., D.2.b., D.2.c.

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PTI /

Emissions Unit ID: **P047**

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2. *This is a modification of PTI 08-3649 issued December 3, 1997 and represents the following changes in the emission rates: P047 + 0.25 TPY OC; P048 + 0.05 TPY OC; P049 and P050 + 0.94 TPY OC.

Hone

PTI

Issued: To be entered upon final issuance

Emissions Unit ID: P048

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P048 - Paper Curing Oven - 550 lbs/hr; Ov 3002 with Regenerative Thermal Oxidizer; *Modification	OAC rule 3745-31-05 (A)(3)	Organic Compounds (OC): 0.71 lb/hr, 0.16 ton/month, 1.93 TPY The requirements of this rule also include compliance with the requirements of OAC 3745-21-07 (G)(6)(a).
	OAC rule 3745-35-07 (B) Synthetic Minor Title V	Reference A.2.b.
	OAC rule 3745-21-07 (G)(6)(a)	Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.
	OAC rule 3745-21-07 (G)(1)	The requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

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PTI
Issue

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- 2.b** The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

Hone

PTI /

Emissions Unit ID: **P048**

Issued: To be entered upon final issuance

B. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1650 degrees Fahrenheit.
2. The maximum paper usage rate for this emissions unit shall not exceed 249,417 lbs/month or 2,993,000 lbs/year, based on rolling, 12-month summations.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1650 degrees Fahrenheit.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall collect and record the paper usage rate, in pounds, each month for this emissions unit.
 3. The permittee shall collect and record the following information each month for the entire facility.
 - a. The total individual Hazardous Air Pollutant (HAP)* emission rate, in tons per month, for each HAP employed at this facility.
 - b. The total combined HAP emission rate, in tons per month, for all of the HAPs employed at this facility.
 - c. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.

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- d. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:
 - a. the paper usage limitations;
 - b. the individual facility HAP limitation; and
 - c. the combined facility HAP limitation.
3. The permittee shall submit all reports required by this permit in accordance with the general terms and condition A.2.
4. The permittee shall submit annual reports which specify the individual HAP emission rate and the combined HAP emission rate from this facility. These reports shall be submitted to the Director (appropriate Ohio EPA District Office or local air agency) by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation-
0.71 lb/hr OC

Applicable Compliance Method-
Compliance with this emissions limitation shall be based upon the following:
 - i. Multiply the maximum paper usage of 550 lbs/hr by the emission factor of 1.35×10^{-4} lb formaldehyde/lb paper, as derived from the December, 1999 stack test.
 - ii. Multiply the maximum paper usage of 550 lbs/hr by the emission factor of 2.865×10^{-4} lb phenol/lb paper, as derived from the December, 1999 stack test.

- iii. Multiply the maximum paper usage of 550 lbs/hr by the emission factor of 6.975×10^{-4} lb methanol/lb paper, as derived from the December, 1999 stack test.
- iv. Multiply the maximum paper usage of 550 lbs/hr by the emission factor of 1.75×10^{-4} lb isopropanol/lb paper, as derived from the December, 1999 stack test.

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- v. Sum the products from i. through iv., for the total hourly OC emission rate in pounds.
 - b. Emission Limitation-
0.16 ton/month OC

Applicable Compliance Method-
Compliance with this emissions limitation shall be based upon the following:
 - i. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 1.35×10^{-4} lb formaldehyde/lb paper, as derived from the December, 1999 stack test.
 - ii. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 2.865×10^{-4} lb phenol/lb paper, as derived from the December, 1999 stack test.
 - iii. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 6.975×10^{-4} lb methanol/lb paper, as derived from the December, 1999 stack test.
 - iv. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 1.75×10^{-4} lb isopropanol/lb paper, as derived from the December, 1999 stack test.
 - v. Sum the products from i. through iv., in lbs OC/month, for each month and divide by 2000 lbs/ton.
 - c. Emission Limitation-
1.93 TPY OC

Applicable Compliance Method-
Compliance with this emissions limitation shall be based upon record keeping in Section C.2. and shall be the sum of the 12-monthly limits, in lbs, divided by 2000 lbs/ton.
 - d. Compliance with the facility wide HAP emission limitations in Section A.2.b. shall be demonstrated by the record keeping required in Section C.3.

F. Miscellaneous Requirements

1. In accordance with OAC rule 3745-35-07, the following terms in this permit are federally enforceable: A.2.b., C.3., D.2.b., D.2.c.

Hone

PTI /

Emissions Unit ID: **P048**

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2. *This is a modification of PTI 08-3649 issued December 3, 1997 and represents the following changes in the emission rates: P047 + 0.25 TPY OC; P048 + 0.05 TPY OC; P049 and P050 + 0.94 TPY OC.

Hone

PTI

Emissions Unit ID: P049

Issued: To be entered upon final issuance

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P049 - Paper Curing Oven - 500 lbs/hr; Ov. 3003 with Regenerative Thermal Oxidizer; *Modification	OAC rule 3745-31-05 (A)(3)	Organic Compounds (OC): 0.65 lb/hr, 0.15 ton/month, 1.76 TPY
	OAC rule 3745-35-07 (B) Synthetic Minor Title V	The requirements of this rule also include compliance with the requirements of OAC 3745-21-07 (G)(6)(a).
	OAC rule 3745-21-07 (G)(6)(a)	Reference A.2.b.
	OAC rule 3745-21-07 (G)(1)	Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.
		The requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping

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and/or reporting requirements to ensure compliance with these limitations.

- 2.b** The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

B. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1650 degrees Fahrenheit.
2. The maximum paper usage rate for this emissions unit shall not exceed 228,083 lbs/month or 2,737,000 lbs/year, based on rolling, 12-month summations.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1650 degrees Fahrenheit.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall collect and record the paper usage rate, in pounds, each month for this emissions unit.
 3. The permittee shall collect and record the following information each month for the entire facility.
 - a. The total individual Hazardous Air Pollutant (HAP)* emission rate, in tons per month, for each HAP employed at this facility.

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- b. The total combined HAP emission rate, in tons per month, for all of the HAPs employed at this facility.
- c. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.
- d. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:
 - a. the paper usage limitations;
 - b. the individual facility HAP limitation; and
 - c. the combined facility HAP limitation.
3. The permittee shall submit all reports required by this permit in accordance with the general terms and condition A.2.
4. The permittee shall submit annual reports which specify the individual HAP emission rate and the combined HAP emission rate from this facility. These reports shall be submitted to the Director (appropriate Ohio EPA District Office or local air agency) by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation-
0.65 lb/hr OC

Applicable Compliance Method-

Compliance with this emissions limitation shall be based upon the following:

- i. Multiply the maximum paper usage of 500 lbs/hr by the emission factor of 1.35×10^{-4} lb formaldehyde/lb paper, as derived from the December, 1999 stack test.
- ii. Multiply the maximum paper usage of 500 lbs/hr by the emission factor of 2.865×10^{-4} lb phenol/lb paper, as derived from the December, 1999 stack test.
- iii. Multiply the maximum paper usage of 500 lbs/hr by the emission factor of 6.975×10^{-4} lb methanol/lb paper, as derived from the December, 1999 stack test.
- iv. Multiply the maximum paper usage of 500 lbs/hr by the emission factor of 1.75×10^{-4} lb isopropanol/lb paper, as derived from the December, 1999 stack test.

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- v. Sum the products from i. through iv., for the total hourly OC emission rate in pounds.
 - b. Emission Limitation-
0.15 ton/month OC

Applicable Compliance Method-
Compliance with this emissions limitation shall be based upon the following:
 - i. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 1.35×10^{-4} lb formaldehyde/lb paper, as derived from the December, 1999 stack test.
 - ii. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 2.865×10^{-4} lb phenol/lb paper, as derived from the December, 1999 stack test.
 - iii. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 6.975×10^{-4} lb methanol/lb paper, as derived from the December, 1999 stack test.
 - iv. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 1.75×10^{-4} lb isopropanol/lb paper, as derived from the December, 1999 stack test.
 - v. Sum the products from i. through iv., in lbs OC/month, for each month and divide by 2000 lbs/ton.
 - c. Emission Limitation-
1.76 TPY OC

Applicable Compliance Method-
Compliance with this emissions limitation shall be based upon record keeping in Section C.2. and shall be the sum of the 12-monthly limits, in lbs, divided by 2000 lbs/ton.
 - d. Compliance with the facility wide HAP emission limitations in Section A.2.b. shall be demonstrated by the record keeping required in Section C.3.

F. Miscellaneous Requirements

1. In accordance with OAC rule 3745-35-07, the following terms in this permit are federally

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enforceable: A.2.b., C.3., D.2.b., D.2.c.

2. *This is a modification of PTI 08-3649 issued December 3, 1997 and represents the following changes in the emission rates: P047 + 0.25 TPY OC; P048 + 0.05 TPY OC; P049 and P050 + 0.94 TPY OC.

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P050 - Paper Curing Oven - 300 lbs/hr; Ov. 3004 with Regenerative Thermal Oxidizer; *Modification	OAC rule 3745-31-05 (A)(3)	Organic Compounds (OC): 0.39 lb/hr, 0.09 ton/month, 1.06 TPY
	OAC rule 3745-35-07 (B) Synthetic Minor Title V	The requirements of this rule also include compliance with the requirements of OAC 3745-21-07 (G)(6)(a).
	OAC rule 3745-21-07 (G)(6)(a)	Reference A.2.b.
	OAC rule 3745-21-07 (G)(1)	Ninety percent or more of the carbon in the organic material being incinerated shall be oxidized to carbon dioxide.
		The requirements specified by this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

- 2.a The hourly emission limitation was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping

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and/or reporting requirements to ensure compliance with these limitations.

- 2.b** The emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112 (b) of Title III of the Clean Air Act, from this facility shall be less than 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs, based on rolling, 12-month summations.

B. Operational Restrictions

1. The average combustion temperature within the thermal incinerator, for any 3-hour block of time when the emissions unit is in operation, shall not be less than 1650 degrees Fahrenheit.
2. The maximum paper usage rate for this emissions unit shall not exceed 136,875 lbs/month or 1,642,500 lbs/year, based on rolling, 12-month summations.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the combustion temperature within the thermal incinerator when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The monitoring and recording devices shall be capable of accurately measuring the desired parameter. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

The permittee shall collect and record the following information for each day:

- a. All 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when the emissions unit was in operation, was less than 1650 degrees Fahrenheit.
 - b. A log of the downtime for the capture (collection) system, control device, and monitoring equipment, when the associated emissions unit was in operation.
2. The permittee shall collect and record the paper usage rate, in pounds, each month for this emissions unit.
 3. The permittee shall collect and record the following information each month for the entire facility.
 - a. The total individual Hazardous Air Pollutant (HAP)* emission rate, in tons per month, for each HAP employed at this facility.

- b. The total combined HAP emission rate, in tons per month, for all of the HAPs employed at this facility.
- c. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total individual HAP emission rate for each HAP employed at this facility.
- d. The cumulative monthly total, in tons/month, for the first twelve months following the issuance of this permit to install and the updated rolling twelve month total thereafter, of the total combined HAPs for all of the HAPs employed at this facility.

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D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator does not comply with the temperature limitation specified above.
2. The permittee shall submit deviation (excursion) reports which identify any exceedances of the following:
 - a. the paper usage limitations;
 - b. the individual facility HAP limitation; and
 - c. the combined facility HAP limitation.
3. The permittee shall submit all reports required by this permit in accordance with the general terms and condition A.2.
4. The permittee shall submit annual reports which specify the individual HAP emission rate and the combined HAP emission rate from this facility. These reports shall be submitted to the Director (appropriate Ohio EPA District Office or local air agency) by January 31 of each year and shall cover the previous calendar year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation-
0.39 lb/hr OC

Applicable Compliance Method-
Compliance with this emissions limitation shall be based upon the following:
 - i. Multiply the maximum paper usage of 300 lbs/hr by the emission factor of 1.35×10^{-4} lb formaldehyde/lb paper, as derived from the December, 1999 stack test.
 - ii. Multiply the maximum paper usage of 300 lbs/hr by the emission factor of 2.865×10^{-4} lb phenol/lb paper, as derived from the December, 1999 stack test.
 - iii. Multiply the maximum paper usage of 300 lbs/hr by the emission factor of 6.975×10^{-4} lb methanol/lb paper, as derived from the December, 1999 stack test.

- iv. Multiply the maximum paper usage of 300 lbs/hr by the emission factor of 1.75×10^{-4} lb isopropanol/lb paper, as derived from the December, 1999 stack test.

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- v. Sum the products from i. through iv., for the total hourly OC emission rate in pounds.
 - b. Emission Limitation-
0.09 ton/month OC

Applicable Compliance Method-
Compliance with this emissions limitation shall be based upon the following:
 - i. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 1.35×10^{-4} lb formaldehyde/lb paper, as derived from the December, 1999 stack test.
 - ii. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 2.865×10^{-4} lb phenol/lb paper, as derived from the December, 1999 stack test.
 - iii. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 6.975×10^{-4} lb methanol/lb paper, as derived from the December, 1999 stack test.
 - iv. Multiply the paper usage, in lbs/month as determined in C.2. by the emission factor of 1.75×10^{-4} lb isopropanol/lb paper, as derived from the December, 1999 stack test.
 - v. Sum the products from i. through iv., in lbs OC/month, for each month and divide by 2000 lbs/ton.
 - c. Emission Limitation-
1.06 TPY OC

Applicable Compliance Method-
Compliance with this emissions limitation shall be based upon record keeping in Section C.2. and shall be the sum of the 12-monthly limits, in lbs, divided by 2000 lbs/ton.
 - d. Compliance with the facility wide HAP emission limitations in Section A.2.b. shall be demonstrated by the record keeping required in Section C.3.

F. Miscellaneous Requirements

1. In accordance with OAC rule 3745-35-07, the following terms in this permit are federally

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Issued: To be entered upon final issuance

enforceable: A.2.b., C.3., D.2.b., D.2.c.

2. *This is a modification of PTI 08-3649 issued December 3, 1997 and represents the following changes in the emission rates: P047 + 0.25 TPY OC; P048 + 0.05 TPY OC; P049 and P050 + 0.94 TPY OC.