



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

4/17/2013

Certified Mail

Mr. Pat Cowan
Rock-Tenn Converting Company
3347 Madison Road
Cincinnati, OH 45209

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1431070952
Permit Number: P0112099
Permit Type: Initial Installation
County: Hamilton

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

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTI is a final action of the Director 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, made payable to "Ohio Treasurer Josh Mandel," 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
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/pemitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
SWOQA; Indiana; Kentucky



Response to Comments

Facility ID:	1431070952
Facility Name:	Rock-Tenn Converting Company
Facility Description:	
Facility Address:	3347 MADISON ROAD Cincinnati, OH 45209 Hamilton County
Permit:	P0112099, Permit-To-Install - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Cincinnati Enquirer on 02/28/2013. The comment period ended on 03/30/2013.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: (DS1) Clarify definition of gas fired boiler from 40 CFR 63 Subpart JJJJJJ

- a. Comment: Slight rewording would more accurately state 40 CFR 63 definition of gas fired boiler exemption.
- b. Response: Wording will be revised.

2. Topic: (DS2) NOX Potential to Emit

- a. Comment: RockTenn estimated total NOx PTE at 43.60 TPY. Please see our emissions netting analysis. Assuming the boiler operates 8760 Hrs/Yr, 96 Hrs/Yr (48 Hrs/Yr for testing and 48 Hrs/Yr for natural gas curtailments/interruptions) or 8,744 MMBtu/Yr firing ULSD oil at 0.12 lbNOx/MMBtu and 8,664 Hrs/Yr or 861,446 MMBtu/Yr firing natural gas at 0.10 lbNOx/MMBtu, annual NOx PTE is 43.60 TPY.
- b. Response: In order to provide maximum flexibility to the facility, and to reflect worst case emissions potential, the potential to emit was calculated for netting purposes to be from fuel oil firing at 8760 hours of operation. This obviates the need for fuel oil usage restrictions, and recordkeeping and reporting requirements for rolling, twelve month summations of usage.



3. Topic: (DS3) Netting analysis

- a. Comment: From the RockTenn emissions netting analysis, 43.60 TPY of NO_x from the proposed boiler minus 87.00 TPY of NO_x from B001 provides a net change of minus 43.40 TPY achieved.
- b. Response: Based on the response to DS2 above, the proposed figures are correct.

4. Topic: (DS4) Allowable summary

- a. Comment: RockTenn estimated total NO_x PTE at 43.60 TPY. See comment on previous page.
- b. Response: Based on the response to DS2 above, the proposed figures are correct.

5. Topic: Page 14, b)(1)a.

- a. Comment: Expanded definitions of PE, PM-10, and PM-2.5.
- b. Response: PE, PM-10, and PM-2.5 are defined by statute; clarification within the permit is unnecessary and unprecedented.

6. Topic: Page 16, b)(1)k.

- a. Comment: Slight rewording would more accurately state 40 CFR 63 definition of gas fired boiler exemption.
- b. Response: Wording will be revised.

7. Topic: (DS9) Error in PE allowable value.

- a. Comment: This value of 0.0015 Lb/MMBtu is incorrect and should be 0.015 Lb/MMBtu. Per USEPA AP-42 Section 1.3, Table 1.3-1, for No. 2 Fuel Oil firing in boilers < 100 MMBtu, an emission factor of 2 lbs Filterable PM/MGal Oil is provided. $(2 \text{ lbs Filterable PM/MGal Oil}) / (1,000 \text{ Gal}) / (138,000 \text{ BTU/Gal Oil}) * (1,000,000 \text{ Btu/MMBtu}) = 0.015 \text{ lb Filterable PM/MMBtu}$.
- b. Response: This value was a typographical error. The correct value will be inserted.

8. Topic: (DS10) Error in PM-10 allowable value.

- a. Comment: See DS-9.
- b. Response: This value was a typographical error. The correct value will be inserted.

9. Topic: (DS11) Error in PM-2.5 allowable value.

- a. Comment: See DS-9.
- b. Response: This value was a typographical error. The correct value will be inserted.

10. Topic: (DS12) VOC limit for fuel oil combustion.

- a. Comment: The OEPA VOC emission limit of 0.002 lb/MMBtu is based on 0.252 lb/MGal of distillate oil, taken from USEPA AP-42 Section 1.3 Table 1.3-3 for TOC emission factors from uncontrolled distillate oil fired boilers. The AP-42 VOC emission rate is 50% lower than the



emissions performance guarantee of 0.004 Lb/MMBtu (approximately 10 PPM VOC) provided by the manufacturer (Nebraska Boiler) and the burner manufacturer (Coen) on new boilers. Due to the fact that 0.004 lb of VOC/MMBtu is the lowest emission guarantee provided to RockTenn and ULSD oil will only be fired as a backup fuel, we respectfully request that 0.004 Lb/MMBtu be assigned as the permit limit. The 2.39 TPY VOC PTE will still be accommodated by the higher Lb/MMBtu limit requested for ULSD oil firing.

- b. Response: Considering the extremely limited use of fuel oil for the proposed source, we agree to use the manufacturer's emission factor for VOC of 0.004 lbs/MMBtu.

11. Topic: (DS13) Error in PM-10 allowable value.

- a. Comment: See DS-9.
- b. Response: This value was a typographical error. The correct value will be inserted.

12. Topic: (DS14)-(DS18), (DS21)-(DS22) Heat input while using Fuel Oil as fuel is incorrect.

- a. Comment: Manufacturer maximum design distillate oil heat input capacity is 91.08 MMBtu/Hr. Manufacturer maximum design distillate oil firing rate is 660 Gal/Hr, equivalent to 91.08 MMBtu/Hr, assuming 138,000 Btu/Gal in distillate oil.
- b. Response: Boilers in the Ohio EPA air permit system have a single value for maximum heat input. The highest value is used to determine worst case emissions. We recognize that this value slightly increases the annual allowable emissions, but does not affect the lb./MMBtu limits.

13. Topic: (DS20) VOC limit for fuel oil combustion.

- a. Comment: Same as DS12
- b. Response: See DS12 response. Testing requirement is revised to reflect use of manufacturer's emission factor.



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Rock-Tenn Converting Company**

Facility ID:	1431070952
Permit Number:	P0112099
Permit Type:	Initial Installation
Issued:	4/17/2013
Effective:	4/17/2013



Division of Air Pollution Control
Permit-to-Install
for
Rock-Tenn Converting Company

Table of Contents

Authorization	1
A. Standard Terms and Conditions	3
1. Federally Enforceable Standard Terms and Conditions	4
2. Severability Clause	4
3. General Requirements	4
4. Monitoring and Related Record Keeping and Reporting Requirements.....	5
5. Scheduled Maintenance/Malfunction Reporting	6
6. Compliance Requirements	6
7. Best Available Technology	7
8. Air Pollution Nuisance	7
9. Reporting Requirements	7
10. Applicability	8
11. Construction of New Sources(s) and Authorization to Install	8
12. Permit-To-Operate Application	9
13. Construction Compliance Certification	9
14. Public Disclosure	9
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations	10
16. Fees.....	10
17. Permit Transfers	10
18. Risk Management Plans	10
19. Title IV Provisions	10
B. Facility-Wide Terms and Conditions.....	11
C. Emissions Unit Terms and Conditions	13
1. B004, Natural Gas Boiler	14



Final Permit-to-Install
Rock-Tenn Converting Company
Permit Number: P0112099
Facility ID: 1431070952
Effective Date: 4/17/2013

Authorization

Facility ID: 1431070952
Facility Description:
Application Number(s): A0046140
Permit Number: P0112099
Permit Description: Initial installation of a 99.4 MMBtu/hr natural gas-fired boiler, capable of firing ultra-low sulfur fuel as backup.
Permit Type: Initial Installation
Permit Fee: \$200.00
Issue Date: 4/17/2013
Effective Date: 4/17/2013

This document constitutes issuance to:

Rock-Tenn Converting Company
3347 MADISON ROAD
Cincinnati, OH 45209

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

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

A handwritten signature in black ink, appearing to read "Scott J. Nally".

Scott J. Nally
Director



Final Permit-to-Install
Rock-Tenn Converting Company
Permit Number: P0112099
Facility ID: 1431070952
Effective Date: 4/17/2013

Authorization (continued)

Permit Number: P0112099
Permit Description: Initial installation of a 99.4 MMBtu/hr natural gas-fired boiler, capable of firing ultra-low sulfur fuel as backup.

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

Emissions Unit ID:	B004
Company Equipment ID:	Natural Gas Boiler
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Final Permit-to-Install
Rock-Tenn Converting Company
Permit Number: P0112099
Facility ID: 1431070952
Effective Date: 4/17/2013

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

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

2. Severability Clause

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

3. General Requirements

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



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

4. Monitoring and Related Record Keeping and Reporting Requirements

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



- (2) 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 Southwest Ohio Air Quality 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 A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Southwest Ohio Air Quality 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.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Southwest Ohio Air Quality 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).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.



- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Southwest Ohio Air Quality 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:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Southwest Ohio Air Quality 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 Southwest Ohio Air Quality 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.)

10. Applicability

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

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

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



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

14. Public Disclosure

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



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

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

16. Fees

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

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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



Final Permit-to-Install
Rock-Tenn Converting Company
Permit Number: P0112099
Facility ID: 1431070952
Effective Date: 4/17/2013

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. As part of this application, Rock-Tenn Converting Company is using emission netting credits from existing coal fired boiler, emissions unit B001, for the installation of a new 99.4 MMBtu/hr gas/oil fired boiler (emissions unit B004) at Rock-Tenn Converting Company (premise number 1431070952). Rock-Tenn Converting Company shall operate and maintain emissions unit B004 in order to ensure the emission reduction credit noted below.

Emissions Unit B004 potential emissions, in tons per year.

Pollutant	NOx
B004	52.4
Total	52.4

Emission Credits from Existing Coal Boiler, Emissions Unit B001, in tons per year.

Pollutant	NOx
B001	-87.00
Increases Minus Reductions	-34.6
Significant emission threshold	40
Significant emission increase	No

The two year period within the last ten years, as allowed in OAC rule 3745-31-01, is from 2004 to 2005. The emission credits have been calculated by the difference in emissions from the existing coal-fired boiler (B001) compared to the reduction in emissions after the installation of the proposed boiler (B004).

Emissions of NOx from emissions unit B004 would be 52.4 tons per year, which is above the 40 TPY major source modification emission threshold level. Subtracting emissions unit B001 NOx emissions from emissions unit B004 increases gives a net decrease of 34.6 TPY, below the major source significance level of 40 TPY.



Final Permit-to-Install
Rock-Tenn Converting Company
Permit Number: P0112099
Facility ID: 1431070952
Effective Date: 4/17/2013

C. Emissions Unit Terms and Conditions



1. B004, Natural Gas Boiler

Operations, Property and/or Equipment Description:

99.4 mmBtu/hr Natural Gas fired package boiler for steam production.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) g)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01.	Particulate emissions (PE) shall not exceed 6.31 tons per year (TPY). Particulate matter emissions 10 microns and less in diameter (PM10) shall not exceed 7.26 tons per year (TPY). Particulate Matter 2.5 microns and less in diameter (PM2.5) emissions shall not exceed 4.89 tons per year (TPY). Sulfur Dioxide (SO2) emissions shall not exceed 0.67 tons per year (TPY). Volatile Organic Compound (VOC) emissions shall not exceed 2.39 tons per year (TPY). See b)(2)a., b)(2)c., b)(2)d., b)(2)e., and b)(2)g. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-17-10(B)(1), OAC rule 3745-18-06(A), OAC rule 3745-18-06(D), OAC rule 3745-110-03, and 40 CFR Part 60 Subpart Dc.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06.	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06. Voluntary restriction to avoid BAT	See b)(2)c., b)(2)d. and b)(2)e.
d.	ORC 3704.03(T) Best Available Technology (BAT) under the Revised Code applies to nitrogen oxides (NOx) and carbon monoxide (CO).	See b)(2)d. and b)(2)e. for NOx and CO emission limitations.
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
f.	OAC rule 3745-17-10(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). PE shall not exceed 0.020 pound per million Btu actual heat input.
g.	OAC rule 3745-18-06(A)	Fuel burning equipment is exempt from paragraphs (D), (F) and (G) of OAC rule 3745-18-06, and from rules 3745-18-07 to 3745-18-94 of the Administrative Code during any calendar day in which natural gas is the only fuel burned.
h.	OAC rule 3745-18-06(D)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR 60 Subpart Dc.
i.	OAC rule 3745-110-03(C)	See b)(2)d. and b)(2)e. for applicable NOx emission limits.
j.	40 CFR Part 60 Subpart Dc	Emissions of SO2 shall not exceed 0.50 lb of SO2/MMBtu of actual heat input when combusting No. 2 fuel, or as an alternative, comply with c)(1). (This limitation is less stringent than the



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		voluntary restriction for SO ₂ .) Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity. This opacity limitation does not apply during periods of start-up, shutdown or malfunction. See b)(2)f.
k.	40 CFR part 63, Subpart JJJJJJ	The permittee is exempt from the area source MACT requirements pursuant to 40 CFR Part 63.11195(e) of Subpart JJJJJJ as long this emissions unit complies with the following requirements: gas-fired boiler as defined in 63.11237 which states a boiler that primarily burns gas is still considered a gas-fired boiler even if it also burns oil or other liquid fuel during periods of gas curtailment, gas supply emergencies, or for periodic testing. Periodic operational testing of the boiler on liquid fuel shall not to exceed 48 hours during any calendar year. See c)(4).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, these emission limitations/control measures no longer apply.



- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, PM₁₀, PM_{2.5} and VOC emissions from this air contaminant source since the uncontrolled potential to emit for PE, PM₁₀, PM_{2.5} and VOC emissions is less than ten tons per year.

- c. This rule applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Permit to install P0112099 for this contaminant source takes into account the following voluntary restrictions (including use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).

- i. Permittee shall use only ultra low sulfur No. 2 fuel oil having a maximum sulfur content of 15 ppm.
- ii. Emissions of Sulfur Dioxide (SO₂) shall not exceed 0.0015 lb/MMBtu.
- iii. Emissions of Sulfur Dioxide (SO₂) shall not exceed 0.67 TPY.

- d. The following emission limitations shall not be exceeded when burning natural gas:

PE/PM₁₀/PM_{2.5} emissions shall not exceed 0.0076 lb/MMBtu of actual heat input.*

Sulfur Dioxide (SO₂) emissions shall not exceed 0.0006 lb/MMBtu of actual heat input.*

Nitrogen Oxide (NO_x) emissions shall not exceed 0.10 lb/MMBtu of actual heat input.*

Carbon Monoxide (CO) emissions shall not exceed 0.084 lb/MMBtu of actual heat input.*

Volatile Organic Compound (VOC) emissions shall not exceed 0.0055 lb/MMBtu of actual heat input.*

*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.

- e. The following emission limitations shall not be exceeded when burning No. 2 fuel oil:



Particulate emissions (PE) shall not exceed 0.015 lb/MMBtu of actual heat input.*

Particulate Matter 10 microns or less in diameter (PM10) shall not exceed 0.017 lb/MMBtu of actual heat input.*

Particulate Matter 2.5 microns or less in diameter (PM2.5) shall not exceed 0.011 lb/MMBtu of actual heat input.*

SO2 emissions shall not exceed 0.0015 lb/MMBtu of actual heat input.

NOx emissions shall not exceed 0.12 lb/MMBtu of actual heat input.*

CO emissions shall not exceed 0.04 lb/MMBtu of actual heat input.*

VOC emissions shall not exceed 0.004 lb/MMBtu of actual heat input.*

*The emission limitations outlined above for PE/PM10/PM2.5, NOx, CO, and VOC are based on the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with these limitations.

- f. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- g. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas or No. 2 fuel oil, an annual No. 2 fuel oil usage limitation, the fuel oil sulfur content limitation, the use of low-NOx burners, the visible emission limitation, and compliance with the mass emission limitations.

c) Operational Restrictions

- (1) The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in this permit, and shall not exceed a maximum sulfur content of 15 ppm.
- (2) The permittee shall operate and maintain low-NOx burners, at all times when operating this emissions unit, for the combustion of natural gas and No. 2 fuel oil, that comply with the NOx heat input emission limitations listed in b)(2)d. and b)(2)e.
- (3) The permittee shall burn only natural gas or ultra low sulfur content No. 2 fuel oil in this emissions unit.
- (4) For emissions unit B004, the permittee shall burn only natural gas except during periods of gas curtailment, natural gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.



d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain records of the oil burned in this emissions unit, in accordance with either Alternative 1 or Alternative 2 described below:

Alternative 1:

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

Alternative 2:

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

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

For each day during which the permittee burns a fuel other than natural gas or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

- (2) The permittee shall log any fuel use other than natural gas in emissions unit B004. The log shall include the time, in hours, and date of the period when an alternate fuel was used as well as the identification and quantity of the fuel consumed during this time frame. The log shall also include the reason why the alternate fuel was used.



e) Reporting Requirements

- (1) The permittee shall notify the director (the appropriate District Office or local air agency) in writing of any record which shows a deviation from the allowable sulfur dioxide emission limitation contained in this permit, based upon the sulfur dioxide emission rates for shipment of oil, calculated in accordance with the formula specified in OAC rule 3745-18-04(F). The notification shall include a copy of such record and shall be sent to the director (the appropriate District Office or local air agency) within 45 days after the deviation occurs.
- (2) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any record which shows a deviation of the operational restriction in c)(3) and the limitation outlined in c)(4). The notification shall include a copy of such record and shall be sent the Southwest Ohio Air Quality Agency within 30 days after the deviation occurs.
- (3) Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
 - a. construction date (no later than 30 days after such date);
 - b. actual start-up date (within 15 days after such date), including a description of each affected emissions unit, equipment manufacturer, and serial number of the equipment if available; and
 - c. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Southwest Ohio Air Quality Agency
250 William Howard Taft Road
Cincinnati, Ohio 45219

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

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) 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 percent opacity, as a six-minute average, except as specified by rule.



Applicable Compliance Method:

Compliance with this emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emission observations are specifically required to demonstrate compliance with these emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

b. Emission Limitations:

Particulate emissions (PE), particulate matter 10 microns and less in diameter (PM₁₀), and Particulate Matter 2.5 microns and less in diameter (PM_{2.5}) shall not exceed 0.0076 lb/MMBtu of actual heat input when burning natural gas; and

PE emissions shall not exceed 0.015 lb/MMBtu of actual heat input when burning No. 2 fuel oil.

PM₁₀ emissions shall not exceed 0.017 lb/MMBtu of actual heat input when burning No. 2 fuel oil.

PM_{2.5} emissions shall not exceed 0.011 lb/MMBtu of actual heat input when burning No. 2 fuel oil.

Applicable Compliance Method when burning natural gas:

Compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (99.4 thousand cubic feet per hour) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 7.6 lbs. of PE/PM₁₀/PM_{2.5} per million cubic feet, and then dividing by the maximum hourly heat input capacity of the emissions unit (99.4 MMBtu/hr).

Applicable Compliance Method when burning No. 2 fuel oil:

Compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (456.5 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Tables 1.3-1, 1.3-2, and 1.3-6 (revised 5/10) emission factor of 2.0 lbs. of PE, 2.3 lbs. of PM₁₀, and 1.55 lbs. of PM 2.5 per 1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (99.4 MMBtu/hr).

If required the permittee shall demonstrate compliance with the lb/MMBtu emission limitations in accordance with USEPA reference Method 1-5 of 40 CFR, Part 60, Appendix A.

c. Emission Limitations:

SO₂ emissions shall not exceed 0.0006 lb/MMBtu of actual heat input when burning natural gas; and



SO₂ emissions shall not exceed 0.0015 lb/MMBtu of actual heat input when burning No. 2 fuel oil.

Applicable Compliance Method when burning natural gas:

Compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (99.4 thousand cubic feet per hour) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 0.6 lb of SO₂/million cubic feet, and then dividing by the maximum hourly heat input capacity of the emissions unit (99.4 MMBtu/hr).

Applicable Compliance Method when burning No. 2 fuel oil:

Compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the calculated sulfur dioxide emission rate for each shipment of oil received during each calendar month meets the sulfur dioxide emission limitation.

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitations in accordance with USEPA reference Method 6, Method 6A, Method 6B, or Method 6C, whichever is appropriate, of 40 CFR, Part 60, Appendix A.

d. Emission Limitations:

NO_x emissions shall not exceed 0.10 lb/MMBtu of actual heat input when burning natural gas; and

NO_x emissions shall not exceed 0.12 lb/MMBtu of actual heat input when burning No. 2 fuel oil.

Applicable Compliance Method when burning natural gas:

Compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (99.4 thousand cubic feet per hour) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emission factor of 100 lbs. of NO_x/ million cubic feet of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (99.4 MMBtu/hr).

Applicable Compliance Method when burning No. 2 fuel oil:

Compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (720 gallons/hr) by the vendor provided as submitted with permit application A0045203 emission factor equivalent of 16.6 lbs. of NO_x/1000 gallons of fuel oil and then dividing by the maximum hourly heat input capacity of the emissions unit (99.4 MMBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation in accordance with Method 10, 40 CFR, Part 60, Appendix A.



e. Emission Limitations:

CO emissions shall not exceed 0.084 lb/MMBtu of actual heat input when burning natural gas; and

CO emissions shall not exceed 0.040 lb/MMBtu of actual heat input when burning No. 2 fuel oil.

Applicable Compliance Method when burning natural gas:

Compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (99.4 thousand cubic feet per hour) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emission factor of 84 lbs. of CO/ million cubic feet of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (99.4 MMBtu/hr).

Applicable Compliance Method when burning No. 2 fuel oil:

Compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (720 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 5/10) emission factor of 5 lbs. of CO/1000 gallons of fuel oil and then dividing by the maximum hourly heat input capacity of the emissions unit (99.4 MMBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation in accordance with Method 10, 40 CFR, Part 60, Appendix A.

f. Emission Limitations:

VOC emissions shall not exceed 0.0055 lb/MMBtu of actual heat input when burning natural gas; and

VOC emissions shall not exceed 0.004 lb of VOC/MMBtu of actual heat input when burning No. 2 fuel oil.

Applicable Compliance Method when burning natural gas:

Compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (99.4 thousand cubic feet per hour) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 5.50 lbs. of VOC/million cubic feet of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (99.4 MMBtu/hr).

Applicable Compliance Method when burning No. 2 fuel oil:

Compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (720 gallons/hr) by manufacturer's supplied emission factor of 0.54lb of VOC/1000 gallons of fuel oil and then dividing by the maximum hourly heat input capacity of the emissions unit (99.4 MMBtu/hr).



If required, the permittee shall demonstrate compliance with the lb/MMBtu limitations in accordance with Method 25, 40 CFR, Part 60, Appendix A.

g. Emission Limitations:

Particulate emissions (PE) shall not exceed 6.31 tons per year (TPY).

Particulate matter 10 microns and less in diameter (PM₁₀) shall not exceed 7.26 tons per year (TPY).

Particulate matter 2.5 microns and less in diameter (PM_{2.5}) shall not exceed 4.89 tons per year (TPY).

Volatile Organic Compound (VOC) emissions shall not exceed 2.39 tons per year (TPY).

Sulfur Dioxide (SO₂) emissions shall not exceed 0.67 ton per year (TPY).

Applicable Compliance Method:

For PE/PM₁₀/PM_{2.5}:

Compliance with the annual emission limitation may be demonstrated by multiplying the lb of PE/PM₁₀/PM_{2.5} per MMBtu value by the maximum rated heat input capacity of the emissions unit (in MMBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

For VOC:

Compliance with the annual emission limitation may be demonstrated by multiplying the lb of VOC/MMBtu value by the maximum rated heat input capacity of the emissions unit (in MMBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

For SO₂:

Compliance with the annual emission limitation may be demonstrated by multiplying the lb of SO₂/MMBtu value by the maximum rated heat input capacity of the emissions unit (in MMBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

- (2) Compliance with the sulfur content limitation for ultra low sulfur No. 2 fuel oil specified in c)(1) shall be determined by the record keeping requirements specified in d)(1).
- (3) 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 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.



- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for NO_x, while burning natural gas in the appropriate averaging period(s),
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

Method 7 from 40 CFR, Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. 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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) **Miscellaneous Requirements**

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit-to-install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit-to-install.