

Synthetic Minor Determination and/or **Netting Determination**
Permit To Install: 03-17115

A. Source Description

P.H. Glatfelter Company is proposing to modify two existing coaters, emissions units K001 and K002 and to install a new color compounding area (emissions unit P003). K001 and K002 are being modified to increase OC emissions due to a coating formulation change for the production of deep shade tinted carbonless paper.

B. Facility Emissions and Attainment Status

P.H. Glatfelter Company is not a "major" facility for Title V purposes. Sandusky county is designated as attainment for all criteria pollutants.

C. Source Emissions

This permit will place federally enforceable restrictions on all three emissions units by way of a combined annual restriction on coating usage of 2,820,000 gallon and a VOC content of 0.055 lbs/gallon, as applied. These restrictions will result in a permit allowable emissions rate of 77.6 tons per rolling 12-month period combined for K001, K002 and P003.

D. Conclusion

With federally enforceable restrictions in place for OC emissions, facility-wide emissions will be less than 100 tons OC/year, making P.H. Glatfleter Company a "minor" facility for Title V purposes.



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: DRAFT PERMIT TO INSTALL
SANDUSKY COUNTY
Application No: 03-17115
Fac ID: 0372030100**

CERTIFIED MAIL

| | |
|---|------------------------------|
| | TOXIC REVIEW |
| | PSD |
| Y | SYNTHETIC MINOR |
| | CEMS |
| | MACT |
| | NSPS |
| | NESHAPS |
| | NETTING |
| | MAJOR NON-ATTAINMENT |
| | MODELING SUBMITTED |
| | GASOLINE DISPENSING FACILITY |

DATE: 5/9/2006

P.H. Glatfelter Company
Kimberly Lute
PO Box 2500 401 South Paint Street
Chillicothe, OH 45601

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 **\$600** 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.

Sincerely,

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

SANDUSKY COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 03-17115 FOR AN AIR CONTAMINANT SOURCE FOR
P.H. Glatfelter Company**

On 5/9/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **P.H. Glatfelter Company**, located at **2275 Commerce Drive, Fremont, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-17115:

Modifications to coating formulations for (2) coaters and installaion of a new color compounding area.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Don Waltermeyer, Ohio EPA, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402 [(419)352-8461]



**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 03-17115

Application Number: 03-17115
Facility ID: 0372030100
Permit Fee: **To be entered upon final issuance**
Name of Facility: P.H. Glatfelter Company
Person to Contact: Kimberly Lute
Address: PO Box 2500 401 South Paint Street
Chillicothe, OH 45601

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2275 Commerce Drive
Fremont, Ohio**

Description of proposed emissions unit(s):
Modifications to coating formulations for (2) coaters and installation of a new color compounding area.

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

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 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 Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(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> |
|------------------|----------------------|
| OC | 77.6 |
| CO | 4.90 |
| Nox | 5.86 |

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.

Operations, Property, and/or Equipment - (K001) - *coaters no.1 with natural gas drying oven (modification to PTI 03-8238, issued September 7, 1995 to increase OC limit due to coating formulation change. The modification will also involve establishing a synthetic minor restriction to avoid Title V).*

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|-------------------------------|--|
| OAC rule 3745-31-05 (A)(3) | <u>Emissions from Coating Operation</u> 37.1 lbs organic compounds (OC)/hour <u>Emissions from Natural Gas Combustion (Drying Oven)</u> 0.67 lb nitrogen oxides (NOX)/hour; 2.93 tons NOX/year 0.56 lb carbon monoxide (CO)/hour; 2.45 tons CO/year See A.2.a |
| OAC rule 3745-31-05 (C) | 77.6 tons OC per rolling 12-month period from emissions units K001, K002 and P003 combined (See A.2.b) |
| OAC rule 3745-21-09 (F) | 2.9 lbs VOC per gallon of coating, excluding water and exempt solvents |
| OAC rule 3745-23-06 (B) | See A.2.c |
| OAC rule 3745-21-08 (B) | See A.2.d |

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-09(F).
- 2.b The OC emissions from emissions units K001, K002 & P003 combined shall not exceed 77.6 tons per rolling 12-month period based on a material usage restriction (See B.1) and an OC content restriction (see section B.2).

The 77.6 tons of OC per year is a federally enforceable limitation established for purposes of avoiding Title V applicability. For purposes of federal enforceability, OC emissions effectively restrict VOC emissions.

- 2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On February 14, 2005, OAC rule 3745-23-06 was rescinded; therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revision to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.d The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was received was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the 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 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.e The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

B. Operational Restrictions

- 1. The maximum annual coating usage from K001, K002 & P003 combined shall not exceed 2,820,000 gallons, based on a rolling, 12-month summation of coating usage. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

| <u>Month(s)</u> | <u>Maximum Allowable Cumulative Coating Usage (gallons)</u> |
|-----------------|---|
| 1 | 235,000 |
| 1-2 | 470,000 |

| | |
|------|-----------|
| 1-3 | 705,000 |
| 1-4 | 940,000 |
| 1-5 | 1,175,000 |
| 1-6 | 1,410,000 |
| 1-7 | 1,645,000 |
| 1-8 | 1,880,000 |
| 1-9 | 2,115,000 |
| 1-10 | 2,350,000 |
| 1-11 | 2,585,000 |
| 1-12 | 2,820,000 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling 12-month summation of coating usage.

2. The OC content of the coatings employed in emissions unit K001 shall not exceed 0.055 pounds per gallon, as applied.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the company name and identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gal [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - d. the OC content, in pounds per gallon, for each coating, as applied;
 - e. the OC emission rate for each coating employed, in lbs/month ($C.1.b \times C.1.d$ for each coating employed); and
 - f. the total monthly OC emission rate for all coatings employed, in lbs (summation of e for all coatings).

2. In conjunction with the recordkeeping requirements specified in C.1 above, the permittee shall also record the following each month for emission units K001, K002 & P003 combined:
 - a. for the first 12 months of operation following the issuance of this permit, the cumulative year-to-date total OC emissions rates, in tons;
 - b. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month OC emission rate, in tons;
 - c. during the first 12 calendar months of operation following the issuance of this permit, the cumulative year-to-date coating usage rate, in gallons; and
 - d. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the coating usage rate, in gallons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. All exceedances of the rolling, 12-month coatings usage restriction of 2,820,000 gallons (for emissions units K001, K002, and P003, combined).
 - b. All exceedances of the rolling, 12-month OC emission limitation of 77.6 tons.
 - c. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings usage rates specified in section B.1.

These reports shall be submitted in accordance with the general terms and conditions of this permit.

2. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings that exceed the 0.055 lbs of OC/gallon of coating, as applied in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the Northwest District Office) in writing of any monthly record showing the use of noncomplying coatings that exceed the 2.9 lbs of VOC/gallon excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the Northwest District Office) within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation**
37.1 lbs OC/hour

Applicable Compliance Method

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (750 gallons per hour) by the maximum OC content of all the coatings (0.055 pounds per gallon) and applying a value of 90% as the maximum percentage of the organic compounds contained in coatings that are emitted uncontrolled from this emissions unit. The remaining 10% of the organic compounds contained in the coatings shall be considered to be uncontrolled emissions for the associated color compounding area (P003).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

- b. **Emission Limitation**
77.6 tons OC per rolling 12-month period for emissions units K001, K002 & P003 combined

Applicable Compliance Method

Compliance with this limitation shall be demonstrated through recordkeeping requirements in section C.2 of this permit.

- c. **Emission Limitation:** 0.67 lb NOX/hr; 2.93 tons NOX/year from natural gas combustion from drying oven

Applicable Compliance Method: Compliance with the hourly emissions limitation shall be determined by multiplying a maximum heat input of 7.0 mmBtu/hr by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NOX/million scf of natural gas, and dividing by 1050 mmBtu/ mm cu. ft. of natural gas.

If required, compliance with the NOX limitation above shall be determined in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 7.

The annual NOX emission limitation was established by multiplying the hourly limitation by 8760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

- d. Emission Limitation: 0.56 lb CO/hr; 2.45 tons CO/year from natural gas combustion from drying oven

Applicable Compliance Method: Compliance with the hourly emissions limitation shall be determined by multiplying a maximum heat input of 7.0 mmBtu/hr by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 84 lbs CO/million scf of natural gas, and dividing by 1050 mmBtu/ mm cu. ft. of natural gas.

If required, compliance with the CO limitation above shall be determined in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 10.

The annual CO emission limitation was established by multiplying the hourly limitation by 8760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

F. Miscellaneous Requirements

None

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.

Operations, Property, and/or Equipment - (K002) - Coaters no.2 (modification to PTI 03-8238, issued September 7, 1995 to increase the OC limit due to coating formulation change. This modification will also result in establishing a synthetic minor restriction to avoid Title V).

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|-------------------------------|--|
| OAC rule 3745-31-05 (A)(3) | <u>Emissions from Coating Operation</u> 49.5 lbs organic compounds (OC)/hour <u>Emissions from Natural Gas Combustion (Drying Oven)</u> 0.67 lb nitrogen oxides (NOX)/hour; 2.93 tons NOX/year 0.56 lb carbon monoxide (CO)/hour; 2.45 tons CO/year See A.2.a |
| OAC rule 3745-31-05 (C) | 77.6 tons OC per rolling 12-month period from emissions units K001, K002 and P003 combined (See A.2.b) |
| OAC rule 3745-21-09 (F) | 2.9 lbs VOC per gallon of coating, excluding water and exempt solvents |
| OAC rule 3745-23-06 (B) | See A.2.c |
| OAC rule 3745-21-08 (B) | See A.2.d |

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-21-09(F).
- 2.b The OC emissions from emissions units K001, K002 & P003 combined shall not exceed 77.6 tons per rolling 12-month period based on a material usage restriction (See B.1) and an OC content restriction (see section B.2).

The 77.6 tons of OC per year is a federally enforceable limitation established for purposes of avoiding Title V applicability. For purposes of federal enforceability, OC emissions effectively restrict VOC emissions.

- 2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On February 14, 2005, OAC rule 3745-23-06 was rescinded; therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revision to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.d The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was received was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the 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 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.e The hourly emission limitation represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitation.

B. Operational Restrictions

- 1. The maximum annual coating usage from K001, K002 & P003 combined shall not exceed 2,820,000 gallons, based on a rolling, 12-month summation of coating usage. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

| <u>Month(s)</u> | <u>Maximum Allowable Cumulative Coating Usage (gallons)</u> |
|-----------------|---|
| 1 | 235,000 |
| 1-2 | 470,000 |
| 1-3 | 705,000 |
| 1-4 | 940,000 |

| | |
|------|-----------|
| 1-5 | 1,175,000 |
| 1-6 | 1,410,000 |
| 1-7 | 1,645,000 |
| 1-8 | 1,880,000 |
| 1-9 | 2,115,000 |
| 1-10 | 2,250,000 |
| 1-11 | 2,585,000 |
| 1-12 | 2,820,000 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling 12-month summation of coating usage.

2. The OC content of the coatings employed in emissions unit K002 shall not exceed 0.055 pounds per gallon, as applied.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the company name and identification of each coating employed;
 - b. the number of gallons of each coating employed;
 - c. the VOC content of each coating (excluding water and exempt solvents), as applied, in lbs/gal [The VOC content excluding water and exempt solvents shall be calculated in accordance with the equation specified in paragraph (B)(8) of OAC rule 3745-21-10 for $C_{VOC,2}$];
 - d. the OC content, in pounds per gallon, for each coating, as applied;
 - e. the OC emission rate for each coating employed, in lbs/month (C.1.b x C.1.d) for each coating employed); and
 - f. the total monthly OC emission rate for all coatings employed, in lbs (summation of e for all coatings).
2. In conjunction with the recordkeeping requirements specified in C.1 above, the permittee shall also record the following each month for emission units K001, K002 & P003 combined:

- a. for the first 12 months of operation following the issuance of this permit, the cumulative year-to-date total OC emissions rates, in tons per;
- b. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month OC emission rate, in tons;
- c. during the first 12 calendar months of operation following the issuance of this permit, the cumulative year-to-date coating usage rate, in gallons; and
- d. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the coating usage rate, in gallons.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify the following:
 - a. All exceedances of the rolling, 12-month coatings usage restriction of 2,820,000 gallons (for emissions units K001, K002, and P003, combined).
 - b. All exceedances of the rolling, 12-month OC emission limitation of 77.6 tons.
 - c. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative coatings usage rates specified in section B.1.

These reports shall be submitted in accordance with the general terms and conditions of this permit.

2. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings that exceed the 0.055 lbs of OC/gallon of coating, as applied in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
3. The permittee shall notify the Director (the Northwest District Office) in writing of any monthly record showing the use of noncomplying coatings that exceed the 2.9 lbs of VOC/gallon excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the Northwest District Office) within 30 days following the end of the calendar month.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation**
49.5 lbs OC/hour

Applicable Compliance Method

The hourly allowable OC emission limitation above represents the potential to emit for this emission unit and was established by multiplying the maximum hourly coatings usage rate (1000 gallons per hour) by the maximum OC content of all the coatings (0.055 pounds per gallon) and applying a value of 90% as the maximum percentage of the organic compounds contained in coatings that are emitted uncontrolled from this emissions unit. The remaining 10% of the organic compounds contained in the coatings shall be considered to be uncontrolled emissions for the associated color compounding area (P003).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

- b. **Emission Limitation**
77.6 tons OC per rolling 12-month period for emissions units K001, K002 & P003 combined

Applicable Compliance Method

Compliance with this limitation shall be demonstrated through recordkeeping requirements in section C.2 of this permit.

- c. **Emission Limitation:** 0.67 lb NOX/hr; 2.93 tons NOX/year from natural gas combustion from drying oven

Applicable Compliance Method: Compliance with the hourly emissions limitation shall be determined by multiplying a maximum heat input of 7.0 mmBtu/hr by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 100 lbs NOX/million scf of natural gas, and dividing by 1050 mmBtu/ mm cu. ft. of natural gas.

If required, compliance with the NOX limitation above shall be determined in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 7.

The annual NOX emission limitation was established by multiplying the hourly limitation by 8760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

- d. **Emission Limitation:** 0.56 lb CO/hr; 2.45 tons CO/year from natural gas combustion from drying oven

Applicable Compliance Method: Compliance with the hourly emissions limitation shall be determined by multiplying a maximum heat input of 7.0 mmBtu/hr by the emission factor in AP-42, Chapter 1.4 (revised 7/98) of 84 lbs CO/million scf of natural gas, and dividing by 1050 mmBtu/ mm cu. ft. of natural gas.

If required, compliance with the CO limitation above shall be determined in accordance with the test methods and procedures specified in 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 10.

The annual CO emission limitation was established by multiplying the hourly limitation by 8760 hours/year, and then dividing by 2000 pounds/ton. Therefore, provided compliance is demonstrated with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

F. Miscellaneous Requirements

None

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.

Operations, Property, and/or Equipment - (P003) - Color compounding area

| Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|-------------------------------|--|
| OAC rule 3745-31-05 (A)(3) | 4.71 lbs organic compounds (OC)/hour, 20.63 tons OC/year See A.2.a |
| OAC rule 3745-31-05 (C) | 77.6 tons OC per rolling 12-month period from emissions units K001, K002 and P003 combined (See A.2.b) |
| OAC rule 3745-21-07 (G)(2) | See A.2.c |

2. Additional Terms and Conditions

- 2.a The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(C).
- 2.b The OC emissions from emissions units K001, K002 & P003 combined shall not exceed 77.6 tons per rolling 12-month period based on a material usage restriction (See B.1) and an OC content restriction (see section B.2).

The 77.6 tons of OC per year is a federally enforceable limitation established for purposes of avoiding Title V applicability. For purposes of federal enforceability, OC emissions effectively restrict VOC emissions.

- 2.c OAC Rule 3745-21-07 (G)(2) does not apply because the emissions unit is not involved in “employing, applying, evaporating or drying” photochemically reactive material (Ohio Supreme Court’s decision in Ashland Chemical Company vs. Jones (2001), 92 Ohio St. 3d 234).

2.d The hourly and annual emission limitations represents the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with this emission limitations.

B. Operational Restrictions

1. The maximum annual coating usage from K001, K002 & P003 combined shall not exceed 2,820,000 gallons, based on a rolling, 12-month summation of coating usage. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the levels specified in the following table:

| <u>Month(s)</u> | <u>Maximum Allowable Cumulative Coating Usage (gallons)</u> |
|-----------------|---|
| 1 | 235,000 |
| 1-2 | 470,000 |
| 1-3 | 705,000 |
| 1-4 | 940,000 |
| 1-5 | 1,175,000 |
| 1-6 | 1,410,000 |
| 1-7 | 1,645,000 |
| 1-8 | 1,880,000 |
| 1-9 | 2,115,000 |
| 1-10 | 2,250,000 |
| 1-11 | 2,585,000 |
| 1-12 | 2,820,000 |

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual coating usage limitation shall be based upon a rolling 12-month summation of coating usage.

2. The OC content of the coatings mixed in emissions unit P003 shall not exceed 0.055 pounds per gallon, as applied.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the company name and identification of each coating mixed;
 - b. the OC content, in pounds per gallon, for each coating mixed;
2. The monitoring and record keeping contained in emissions units K001 and K002 shall be used to demonstrate compliance with both the 77.6 tons OC per rolling 12-month period and the maximum annual coating usage not to exceed 2,820,000 gallons per rolling 12-month period from emissions units K001, K002 and P003 combined. Emissions unit P003 is used to mix coatings which are applied in emissions units K001 and K002. A percentage (10% maximum) of the organic compounds in the coatings is emitted during mixing operations. The remaining organic compounds contained in the coatings are emitted from emissions units K001 and K002. The monitoring and record keeping in emissions unit K001 and K002 is structured to account for all coating usage and all the organic compounds contained in the coatings. Therefore no additional monitoring and record keeping will be required for emissions unit P003 to demonstrate compliance with the above mentioned limitations.

D. Reporting Requirements

1. The permittee shall notify the Northwest District Office in writing of any monthly record showing the use of noncomplying coatings that exceed the 0.055 lbs of OC/gallon of coating mixed in this emissions unit. The notification shall include a copy of such record and shall be sent to the Northwest District Office within 30 days following the end of the calendar month.
2. The reporting requirements contained in emissions units K001 and K002 shall be used to demonstrate compliance with both the 77.6 tons OC per rolling 12-month period and the maximum annual coating usage not to exceed 2,820,000 gallons per rolling 12-month period from emissions units K001, K002 and P003 combined. Emissions unit P003 is used to mix coatings which are applied in emissions units K001 and K002. A percentage (10% maximum) of the organic compounds in the coatings is emitted during mixing operations. The remaining organic compounds contained in the coatings are emitted from emissions units K001 and K002. The reporting requirements in emissions unit K001 and K002 is structured to address all coating usage and the organic compounds contained in the coatings. Therefore no reporting will be required for emissions unit P003 to demonstrate compliance with the above mentioned limitations.

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. **Emission Limitation**
4.71 lbs OC/hour, 20.63 tons OC/year

Applicable Compliance Method

The hourly OC emission limitations above represents the potential to emit for this emissions unit. The hourly emission limitation was established by multiplying the maximum hourly coating mixing rate (857 gallons per hour) by the maximum OC content of all the coatings (0.055 pounds per gallon) and applying a value of 10% as the maximum percentage of the organic compounds contained in the coatings that are emitted uncontrolled from this emissions unit. The remaining 90% of the organic compounds contained in the coatings shall be considered to be uncontrolled emissions for the associated coating operations (K001 & K002).

If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

The annual allowable OC emission limitation represents the potential to emit for this emissions unit and was established by multiplying the maximum hourly emissions by a maximum operating schedule of 8,760 hours per year and dividing by 2000 pounds per ton.

- b. **Emission Limitation**
77.6 tons OC per rolling 12-month period for emissions units K001, K002 & P003 combined

Applicable Compliance Method

See C.2

F. Miscellaneous Requirements

None