



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
50 West Town Street, Suite 700  
Columbus, OH 43215

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

Mailing Address:

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

06/07/07

CERTIFIED MAIL

**RE: Draft Title V Chapter 3745-77  
permit**

01-23-01-0150  
Sonoco Products Company  
Peggi Davis  
1 North Second Street  
MC A55  
Hartsville, SC 29550

Dear Peggi Davis:

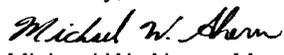
You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Central District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to the following address:**

**Andrew Hall  
Permit Review/Development Section  
Ohio EPA, Division of Air Pollution Control  
122 South Front Street  
Columbus, Ohio 43215**

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact Central District Office.

Sincerely,

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

cc: USEPA (electronically submitted)  
File, DAPC PIER  
Central District Office



State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 06/07/07

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 01-23-01-0150 to: Sonoco Products Company Kentucky

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B001 (Boiler #1) 38 MM BTU/hr Coal Fired Boiler with multiclone	B002 (Boiler #2) 33.5 MM BTU/hr Distillate (No. 2) Oil Fired and Na	tural Gas Boiler
--	--	------------------

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Central District Office  
(614) 728-3778  
01/01/00

Ohio Environmental Protection Agency

Chris Korleski  
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Section

#### 1. 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, i.e., in Section A.III of Part III of this Title V permit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
- i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.  
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))
- 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 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.  
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))
- c. The permittee shall submit required reports in the following manner:

- i. **All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:**

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter (An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c)).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) constitutes a violation of an emission limitation (or control requirement) and, therefore, is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided

in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this General Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this General Term and Condition.

See B.6 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

- iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; General Terms and Conditions: A.2, A.3, A.4, A.6.e, A.7, A.12, A.14, A.18, A.19, A.20, and A.22 of Part I of this Title V permit, as well as any deviations from the requirements in Section A.V or A.VI of Part III of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office

or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in Part II.A of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

- iv. 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

- v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

## 2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance 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). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

## 3. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

## 4. Title IV Provisions

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

*(Authority for term: OAC rule 3745-77-07(A)(5))*

**5. Severability Clause**

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

*(Authority for term: OAC rule 3745-77-07(A)(6))*

**6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, revoked, or revoked and reissued, for cause, in accordance with A.10 below. 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, reopening 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.
- f. Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable upon final issuance of all applicable OAC Chapter 3745-35 operating permits and/or registrations for all subject emissions units located at the facility and:
  - i. the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - ii. the permittee no longer meets the definition of a “major source” as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - iii. a combination of i. and ii. above.

The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**8. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**9. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**10. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**11. Federal and State Enforceability**

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

*(Authority for term: OAC rule 3745-77-07(B))*

**12. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.
  - ii. Compliance certifications shall include the following:
    - (a) An identification of each term or condition of this permit that is the basis of the certification.
    - (b) The permittee's current compliance status.
    - (c) Whether compliance was continuous or intermittent.
    - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
    - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
  - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

### 13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

**14. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).  
*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

**15. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.  
*(Authority for term: OAC rule 3745-77-07(G))*

**16. Off-Permit Changes**

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.  
*(Authority for term: OAC rule 3745-77-07(I))*

**17. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.  
*(This term is provided for informational purposes only.)*

**18. Insignificant Activities or Emissions Levels**

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.  
(Authority for term: OAC rule 3745-77-07(A)(1))

**19. Permit to Install Requirement**

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.  
(Authority for term: OAC rule 3745-77-07(A)(1))

**20. 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.  
(Authority for term: OAC rule 3745-77-07(A)(1))

**21. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an “emissions unit” as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.  
(Authority for term: OAC rule 3745-77-01)

**22. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

**B. State Only Enforceable Section**

**1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

**2. 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.

**3. 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.

**4. 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).

**5. 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.

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

- a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii; or
- b. where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or
- c. where the company's responsible official has certified that an emissions unit has been permanently shut down.

## **Part II - Specific Facility Terms and Conditions**

### **A. State and Federally Enforceable Section**

**None**

### **B. State Only Enforceable Section**

1. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

Z001 - Maintenance Parts Washer;  
Z003 - Maintenance Welding;  
Z004 - Coal Storage Pile;  
Z005 - Coal Unloading;  
Z006 - Coal Loading;  
Z007 - Coal Conveying;  
Z008 - Ash Handling;  
Z009 - Fuel Oil Storage Tank;  
Z010 - Fuel Dispensing Operation; and  
Z011 - Paper Machine.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Boiler #1 (B001)

**Activity Description:** 38 MM BTU/hr Coal Fired Boiler with multiclone

#### A. State and Federally Enforceable Section

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
38 mmBtu/hr coal-fired boiler with multiclone and continuous opacity monitor (COM).	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(C)(1)	Particulate emissions shall not exceed 0.27 lb/mmBtu actual heat input.
	OAC rule 3745-18-29(E)	Sulfur dioxide emissions shall not exceed 4.8 lbs/mmBtu actual heat input.
	OAC rule 3745-31-05(C) (synthetic minor to avoid MACT)	9.9 tons hydrogen chloride (HCl) per rolling, 12-month period from emissions unit B001(see A.I.2.a)

##### 2. Additional Terms and Conditions

- 2.a Annual emissions of HCl shall not exceed 9.9 tons per rolling 12-month period from emission units B001. The emission limitation is based on a coal throughput restriction (see A.II.1) for the purpose of establishing federally enforceable limitations to avoid "Maximum Achievable Control Technology" (MACT) applicability.

[Authority for term: OAC rule 3745-77-07(C)(1)]

## II. Operational Restrictions

1. The maximum rolling, 12-month chloride containing coal throughput for emissions unit B001 is limited by the following equation:

$$(U) \times (C) \times (0.94) \times (36/35) = 9.9 \text{ TPY}$$

where,

U = the throughput of coal for each shipment, in tons;

C = chlorine content in weight % for each coal shipment;

(36/35) = molecular weight of chloride is 35 lb/lb-mole and hydrochloric acid is 36 lb/lb-mole;

The equation above assumes 94% \* of the chlorides contained in the coal is converted to HCl during the combustion process.

\* The percentage of chlorides in coal converted to HCL is based on actual stack tests and laboratory data as provided by the National Council for the Air and Stream Improvement of the Pulp and Paper Industry (NCASI) dated April 2007.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, coal throughput for emissions unit B001 is limited by the following:

Months	Tons HCL
1	2.0
1-2	4.0
1-3	8.0
1-4	9.9
1-12	9.9

After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coal throughput restriction shall be based upon a rolling, 12-month summation.

[Authority for term: OAC rule 3745-77-07(C)(1)]

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect or require the coal supplier to collect a representative sample of coal for each shipment of coal which is received for burning in this emissions unit. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal.

Each shipment of coal shall be analyzed for sulfur content (percent), heat content (Btu/pound of coal), and chlorine content (percent). The permittee shall perform or require the supplier to perform the analyses for sulfur content, heat content, and chlorine content in accordance with the following ASTM methods: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isothermal Bomb Calorimeters; and ASTM method D4208, Standard Test Method for Total Chlorine in Coal by the Oxygen Bomb Combustion/Ion Selective Electrode Method, respectively. Alternative, equivalent methods may be used upon written approval from the Ohio EPA, Central District Office.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

2. The permittee shall maintain records of the following information each month for this emissions unit:

- a. total quantity of coal received in each shipment (tons);
- b. the weighted\* average sulfur content;
- c. heat content (percent) of the coal received;
- d. weighted\* average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received;
- e. the chlorine content, in weight percent, for each shipment of coal utilized;
- f. the calculated HCl emissions from each shipment of coal, in tons, using the following equation:

$$E = (U \times C/94)(36/35)$$

where,

$E_n$  = HCl emissions from individual coal shipment utilized;

$U$  = the throughput of coal for each individual shipment, in tons;

$C$  = chlorine content in weight % for each individual coal shipment;

$(36/35)$  = molecular weight of chloride is 35 lb/lb-mole and hydrochloric acid is 36 lb/lb-mole.

g. The total HCl emission rate of all coal shipments utilized, in tons/month, calculated as follows:

$$EM = E_1 + E_2 + E_3 + \dots + E_n$$

where,

$EM$  = Monthly HCl emissions, in tons/month; and

$E_n$  = HCl emissions from each individual shipment of coal utilized (A.III.4.e); and

h. The rolling, 12-month HCl emission rate calculated as follows:

$$ET = EM_1 + EM_2 + EM_3 + \dots + EM_{12}$$

where,

$ET$  = annual HCl emissions (tons) as summed from the previous 12 months of monthly HCl emissions; and

$EM$  = monthly HCl emissions (tons/month).

\*In proportion to the quantity of coal received in each shipment during the calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

Each continuous emission monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

[Authority for term: OAC rule 3745-77-07(C)(1)]

4. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

1. The permittee shall notify the Director (Ohio EPA, Central District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from Section A.III above. The notification shall include a copy of such record and shall be sent to the Director (Ohio EPA, Central District Office) within 45 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1)]

2. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Ohio EPA, Central District Office documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

[Authority for term: OAC rule 3745-77-07(C)(1)]

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

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

#### **IV. Reporting Requirements (continued)**

**3.** The permittee shall submit deviation (excursion) reports, in accordance with the General Terms and Conditions of this permit, that identify all exceedances of the following:

- a. the 9.9 tons of HCl per rolling, 12-month period emission limitation;
- b. the rolling, 12-month chloride containing coal throughput restriction specified in A.II.2.

[Authority for term: OAC rule 3745-77-07(C)(1)]

#### **V. 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):

**1.a** Emission Limitation:

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

Applicable Compliance Method:

If required, compliance 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).

**1.b** Emission Limitation:

0.27 lb of particulate emissions/mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in term No.2 which follows.

**1.c** Emission Limitation:

4.8 lbs of sulfur dioxide/mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be determined by using the fuel analysis records required pursuant to Section A.III.2 and the applicable equation in OAC rule 3745-18-04(F). If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 6.

**1.d** Emission Limitation:

9.9 tons hydrogen chloride (HCl) per rolling, 12-month period from emissions unit B001.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation in accordance with the recordkeeping requirements specified in Section A.III.2.

## **V. Testing Requirements (continued)**

2. The permittee shall conduct, or have conducted, particulate emission testing for this emissions unit to demonstrate compliance with the allowable mass emission rate for particulate matter in accordance with the following requirements:
  - i. The emission testing shall be conducted within 1 year after permit issuance and within 1 year prior to the permit expiration.
  - ii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates for PM: 40 CFR Part 60, Appendix A, Methods 1 through 5.
  - iii. 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 Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Boiler #2 (B002)

**Activity Description:** 33.5 MM BTU/hr Distillate (No. 2) Oil Fired and Natural Gas Boiler

#### A. State and Federally Enforceable Section

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

- The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B002 - (Boiler # 2)- Natural gas and fuel oil fired 33.5 MMBTU/hr boiler with low Nox burners.	OAC rule 3745-31-05(A)(3) (PTI 01-08204)	Particulate emissions (PE) shall not exceed 0.49 pound per hour and 2.2 tons per year.
		Sulfur dioxide (SOx) emissions shall not exceed 16.99 pounds per hour and 74.2 tons per year.
		Nitrogen oxides (NOx) emissions shall not exceed 4.79 pounds per hour and 20.9 tons per year.
		Carbon monoxide (CO) emissions shall not exceed 2.69 pounds per hour and 11.8 tons per year.
		Volatile organic compound (VOC) emissions shall not exceed 0.2 pound per hour and 0.77 tons per year.
		See Sections A.II.1 and A.II.2 below.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input.
	OAC rule 3745-18-06(D)	Sulfur dioxide emissions shall not exceed 1.6 lbs/mmBtu of actual heat input.
	40 CFR 60 Subpart Dc	See A.2.b below.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-21-08(B)	The emission limitation specified by these rules are less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-21-07(B)	See Section A.I.2.d below. See Section A.I.2.e below.

## 2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas or No. 2 fuel oil, fuel sulfur content limitation, and the emission limitations as specified in A.II below and emissions limitation in Section A.I.1 above.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-08204]

- 2.b** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency (U.S. EPA), 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency (Ohio EPA).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-08204]

- 2.c** The lb/mmBtu actual heat input and tons per year emission limitations, except for SO<sub>2</sub>, are based on the emissions unit's potentials to emit. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with these emission limitations.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-08204]

- 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).

On November 5, 2002, OAC rule 3745-21-08 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 U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revisions 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-08204]

- 2.e** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-07(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-08204]

## II. Operational Restrictions

- 1.** The permittee shall burn only natural gas and/or No. 2 fuel oil in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-08204]

## II. Operational Restrictions (continued)

2. The quality of No. 2 fuel oil received for burning in this emissions unit shall have a combination of sulfur content and heat content sufficient to comply with the allowable sulfur dioxide emission limitation of 0.50 lb/mmBtu of actual heat input and the sulfur content limitation for No. 2 fuel oil of less than or equal to 0.5 weight per cent sulfur.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-08204]

## III. Monitoring and/or Record Keeping 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.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-08204]

### 1.a Alternative 1:

For each shipment of oil received for burning in this emissions unit, 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 lb/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, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-08204]

### 1.b 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 fuel oil 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 fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lb/mmBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)].

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-08204]

- 1.c 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 and D4294), or equivalent methods as approved by the Director.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-08204]

2. The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-08204]

### III. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall perform daily checks, when the emissions unit is in operation burning No. 2 fuel oil, and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - a. the color of the emissions;
  - b. whether the emissions are representative of normal operations;
  - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
  - d. the total duration of any visible emission incident; and
  - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### IV. Reporting Requirements

1. The permittee shall notify the Central District Office, in writing, of any fuel burned in this emissions unit other than natural gas or No. 2 fuel oil.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-08204]

2. The permittee shall notify the Central District Office, in writing, of any record which shows a deviation of the allowable sulfur dioxide emission limitation and/or sulfur content limitation based upon the record keeping requirements from term III.1 above.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-08204]

3. The notifications identified in terms IV.2 and IV.3 shall include a copy of such record and shall be sent to the Central District Office within 45 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-08204]

4. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month periods.

[Authority for term: OAC rule 3745-77-07(C)(1)]

### V. 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):

## V. Testing Requirements (continued)

### 1.a Emission Limitations:

Particulate emissions (PE) shall not exceed 0.49 pound per hour and 2.2 tons per year.

#### Applicable Compliance Method:

When firing natural gas, compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (32,000 cf/hr) by the emission factor from AP-42, Fifth Addition, Chapter 1, External Combustion Sources, Section 1.4, Table 1.4-2 (7/98) for particulates from natural gas combustion (7.6 lbs particulates/1,000,000 scf).

When firing number two fuel oil, compliance with this emission limitation may be demonstrated by multiplying the maximum number 2 fuel oil burning capacity of the emissions unit (239.3 gal/hr) by the emission factor from AP-42, Fifth Addition, Chapter 1, External Combustion Sources, Section 1.3, Table 1.3-1 (9/98) for particulates in number 2 fuel oil combustion (2 lbs particulates/1,000 gal).

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

### 1.b Emission Limitations:

Sulfur dioxide (SO<sub>x</sub>) emissions shall not exceed 16.99 pounds per hour and 74.4 tons per year.

#### Applicable Compliance Method:

When firing natural gas, compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (32,000 cf/hr) by the emission factor from AP-42, Fifth Addition, Chapter 1, External Combustion Sources, Section 1.4, Table 1.4-2 (7/98) for SO<sub>x</sub> from natural gas combustion (0.6 lbs SO<sub>x</sub>/1,000,000 scf).

When firing number two fuel oil, compliance with this emission limitation may be demonstrated by multiplying the maximum number 2 fuel oil burning capacity of the emissions unit (239.3 gal/hr) by the emission factor from AP-42, Fifth Addition, Chapter 1, External Combustion Sources, Section 1.3, Table 1.3-1 (9/98) for SO<sub>x</sub> in number 2 fuel oil combustion (142S lb/1000 gallon where S = 0.5% sulfur in the fuel).

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

### 1.c Emission Limitations:

Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 4.79 pounds per hour and 20.9 tons per year.

#### Applicable Compliance Method:

Compliance shall be based upon the emission testing requirements specified in Section A.V.2.

### 1.d Emission Limitations:

Carbon monoxide (CO) emissions shall not exceed 2.69 pounds per hour and 11.8 tons per year.

#### Applicable Compliance Method:

When firing natural gas, compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (32,000 cf/hr) by the emission factor from AP-42, Fifth Addition, Chapter 1, External Combustion Sources, Section 1.4, Table 1.4-2 (7/98) for CO from natural gas combustion (84.0 lbs CO/1,000,000 scf).

When firing number two fuel oil, compliance with this emission limitation may be demonstrated by multiplying the maximum number 2 fuel oil burning capacity of the emissions unit (239.3 gal/hr) by the emission factor from AP-42, Fifth Addition, Chapter 1, External Combustion Sources, Section 1.3, Table 1.3-1 (9/98) for CO in number 2 fuel oil combustion (5.0 lbs CO/1,000 gal).

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

## V. Testing Requirements (continued)

**1.e** Emission Limitations:

Volatile organic compound (VOC) emissions shall not exceed 0.2 pound per hour and 0.8 tons per year.

Applicable Compliance Method:

When firing natural gas, compliance with this emission limitation may be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (32,000 cf/hr) by the emission factor from AP-42, Fifth Addition, Chapter 1, External Combustion Sources, Section 1.4, Table 1.4-2 (7/98) for VOC from natural gas combustion (5.5 lbs VOC/1,000,000 scf).

When firing number two fuel oil, compliance with this emission limitation may be demonstrated by multiplying the maximum number 2 fuel oil burning capacity of the emissions unit (239.3 gal/hr) by the emission factor from AP-42, Fifth Addition, Chapter 1, External Combustion Sources, Section 1.3, Table 1.3-1 (9/98) for VOC in number 2 fuel oil combustion (0.556 lbs VOC/1,000 scf).

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

**1.f** Emission Limitation:

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

Applicable Compliance Method:

If required, compliance 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).

**1.g** Emission Limitation:

1.6 lbs of sulfur dioxide/mmBtu of actual heat input

Applicable Compliance Method:

Except as provided below, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

If the sulfur content of each shipment of oil received during a calendar month does not comply with the allowable emission limitation on an "as-received" basis, compliance with the allowable sulfur dioxide emission limitation shall be based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments of oil during the calendar month.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 6C.

**1.h** Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Method 5.

## V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - i. The emission testing shall be conducted within 1 year after permit issuance and within 1 year prior to the permit expiration.
  - ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for NO<sub>x</sub> while the emissions unit is burning natural gas.
  - iii. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): 40 CFR Part 60, Appendix A, Methods 1-4, and 7E.
  - iv. 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 Ohio EPA, Central District Office.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Central District Office. 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, Central District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, Central District Office 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.

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 Ohio EPA, Central District Office 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 Ohio EPA, Central District Office.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

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

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
---	---	--

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

\*\*\*\*\*

**THIS IS THE LAST PAGE OF THE PERMIT**

\*\*\*\*\*

# Statement of Basis For Title V Permit

Part I - General	
Company Name	Sonoco
Premise Number	01-23-01-0150
What makes this facility a Title V facility?	NOx, SOx
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes.
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No.
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745- )	Other	
None			

7 Instructions for Part II:

Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)																
Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.																
EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments	
		SIP (3745- )	Other													
B001 B002	20%opacity as a 6-minute average.	17-07(A)	n	n	n	y	n	n	y	n	y	n	n	y	n	
B001	0.27 lb particulate/ mmBTU	17-10(C)(1)	n	n	n	y	n	n	y	n	y	n	y	n	n	
B001	4.8 lb SO <sub>2</sub> / mmBTU .	18-29(E)	n	n	n	y	n	n	y	n	y	n	y	n	n	

B001	9.9 tons HCL per rolling, 12-month period.	31-05(C)	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	1.	<p>The maximum rolling, 12-month chloride containing coal throughput for emissions unit B001 is limited by the following equation:</p> $(U) \times (C) \times (0.94) \times (36/35) = 9.9 \text{ TPY}$ <p>where,  U = the throughput of coal for each shipment, in tons;  C = chlorine content in weight % for each coal shipment;  (36/35) = molecular weight of chloride is 35 lb/lb-mole and hydrochloric acid is 36 lb/lb-mole;</p> <p>The equation above assumes 94% * of the chlorides contained in the coal is converted to HCl during the combustion process.</p> <p>* The percentage of chlorides in coal converted to HCL is based on actual stack tests and laboratory data as provided by the National Council for the Air and Stream Improvement of the Pulp and Paper Industry (NCAS) dated April 2007.</p> <p>[Authority for term: OAC rule 3745-77-07(C)(1)]</p>												
B002	0.49 lb PE/hr	31-05(A)(3)	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	n	2.	<p>To ensure enforceability during the first 12 calendar months of operation under the provisions of this permit, coal throughput for emissions unit B001 is limited by the following:</p> <table border="1"> <thead> <tr> <th>Months</th> <th>Tons HCL</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>2.0</td> </tr> <tr> <td>1-2</td> <td>4.0</td> </tr> <tr> <td>1-3</td> <td>8.0</td> </tr> <tr> <td>1-4</td> <td>9.9</td> </tr> <tr> <td>1-12</td> <td>9.9</td> </tr> </tbody> </table> <p>After the first 12 calendar months of operation under the provisions of this permit, compliance with the annual coal throughput restriction shall be based upon a rolling, 12-month summation.</p> <p>[Authority for term: OAC rule 3745-77-07(C)(1)]</p>	Months	Tons HCL	1	2.0	1-2	4.0	1-3	8.0	1-4	9.9	1-12	9.9
Months	Tons HCL																																
1	2.0																																
1-2	4.0																																
1-3	8.0																																
1-4	9.9																																
1-12	9.9																																

B002	16.99 lbs Sox/hr	31-05(A)(3)	n	n	n	y	y	n	n	n	y	n	y	n	y	n	n	n	n	1. The permittee shall burn only natural gas and/or No. 2 fuel oil in this emissions unit. [Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-08204]
																				2. The quality of No. 2 fuel oil received for burning in this emissions unit shall have a combination of sulfur content and heat content sufficient to comply with the allowable sulfur dioxide emission limitation of 0.50 lb/mmBtu of actual heat input and the sulfur content limitation for No. 2 fuel oil of less than or equal to 0.5 weight per cent sulfur. [Authority for term: OAC rule 3745-77-07(C)(1) and PTI 01-08204]
B002	4.49 lbs Nox/hr	31-05(A)(3)	n	n	n	y	y	n	n	n	y	n	y	n	y	n	n	n	n	
B002	2.69 lb CO/hr	31-05(A)(3)	n	n	n	y	y	n	n	n	y	n	y	n	y	n	n	n	n	
B002	0.2 lb VOC/hr	31-05(A)(3)	n	n	n	y	y	n	n	n	y	n	y	n	y	n	n	n	n	
B002	Particulate emissions shall not exceed 0.020 lb/mmBTU of actual heat input.	17-10(B)(1)	n	n	n	y	y	n	n	n	y	n	y	n	y	n	n	n	n	
B002	Sulfur dioxide emissions shall not exceed 1.6 lb/mmBTU of actual heat input.	18-06(D)	n	n	n	y	y	n	n	n	y	n	y	n	y	n	n	n	n	

EU = emissions unit ID

ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)

OR = operational restriction

M = monitoring requirements

St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement

ENF = did noncompliance issues drive the monitoring requirements?

R = record keeping requirements

Rp = reporting requirements

ET = emission testing requirements (not including compliance method terms)

Misc = miscellaneous requirements

Instructions for Part III:

- 7 All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.
- 7 If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not all of the requirements have been transferred from the permit to install.
- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.
3. If the "ND" column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
4. If the "ENF" column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an "N" is noted in the "OR," "Misc," "St," "ND," or "ENF" columns.

**7 Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the "N/A" in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the "Comments" area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain "N/A" when developing the SOB during the initial permit development. Note: APA's and Off-permit changes do not need to be noted in the SOB.