

Statement of Basis For Title V Permit

Part I - General	
Company Name	Caraustar Industries - Rittman Paperboard
Premise Number	02-85-02-0076
What makes this facility a Title V facility?	SO ₂ , PE, VOC, HAPs, NO _x , CO
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)	See summary below

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1	77-07(A)(13)		identification of IEU with applicable requirements
A.2		40 CFR 64	CAM clarification
A.3		40 CFR 63	MACT subpart DDDDD, ICI Boiler attachment for B001 and B003.
A.4	25-03		Emergency episode plan requirement

C

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, B003	20% opacity	17-07(A)		N	N	Y	N	N	Y	N	Y	N	N	N	M - use of certified COMS; R - recording 6-minute average opacity and any deviations of said limit; Rp - quarterly Excess Emission Reports
B001, B003	0.204 lbs/MM Btu PE	17-10(C)(2)		N	N	Y	N	N	Y	N	Y	N	Y	N	M - use of certified COMS as surrogate ; R - recording 6-minute average opacity and any deviations of said limit; Rp - quarterly Excess Emission Reports ET- stack testing yr2-3 and 6 months before expiration.

B001, B003	7.0 lbs SO2/MM Btu	18-91(G)(1)		N	Y	Y	N	N	Y	N	Y	N	N	N	OR - coal quality sufficient to meet SO2 emission standard; M&R - monthly coal composite sampling; Rp - quarterly coal quality and SO2 emission; ET - stack testing only if required.
B001, B003	CAM		40 CFR 64	N	N	Y	N	N	Y	N	Y	N	N	N	M - use of certified COMS, develop QA/QC plan, monitoring of 18% exceedances.
P003	0.020 lb/MM Btu	17-10(B)(1)		N	N	Y	N	N	Y	N	Y	N	N	N	This natural gas-fired boiler is inherently clean burning, emit virtually no particulate matter and exhibit no visible emissions during normal operations. M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. ET - None - per Ohio EPA Engineering Guide 16
P003	20% opacity	17-07(A)		N	N	Y	N	N	Y	N	Y	N	N	N	This natural gas-fired boiler is inherently clean burning, emit virtually no particulate matter and exhibit no visible emissions during normal operations. M - 'Normal' or 'negative' observations on stack visible emissions checks serve as an indicator of ongoing compliance with the emissions limit. A 'negative' observation requires a record noting suspected cause and corrective action. Daily was chosen as a reasonable and practical monitoring frequency. ET - None - per Ohio EPA Engineering Guide 16
P003	OC limitation	21-07		Y	N	N	N	N	N	N	N	N	N	N	Existing source not in a Priority 1 area thus no limits.

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

C Instructions for Part III:

- C 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.
- C 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.
2. 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.

- C **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.

Caraustar - Rittman Paperboard

02-85-02-0076

2005 Title V renewal - Summary of changes and EU background

Issues

In order to avoid confusion with the applicable opacity standard for EU B001 and B003, I urge that this Title V renewal be fast tracked. See the attached e-mail from Todd Brown.

The renewal application was 2 months late. The facility has not yet receive their Orders, but did receive the NOV from Central Office.

Since the last permit, EU B002, B004 and P002 were permanently shutdown.

Summary of changes

Facility Wide

1. Split the IEUs to those with federally enforceable requirements and those with no requirements.
2. Addition of the ICI Boiler MACT explanation. Facility has not chosen a compliance option, thus the rule was attached rather than incorporated into the T&C of the permit.
1. Addition of CAM applicability language. B001 and B003 have potential emissions greater than 100 tons of PE and are controlled by multiclones. The Eus are subject to CAM until the ICI Boier MACT compliance date.

B001

1. Remove the 35% opacity limit established by the EVEL process in 1984. Added a 20% opacity limit per rule and the associated testing. Facility tested in 2003 and 2005 without justifying a continuing need for the EVEL. Please see the attached e-mail between Todd Brown and John Summerhays.
2. Update the PE limit from 17-10 because one boiler was shutdown. Two units tested at 180 MMBtu/hr each during the last two stack tests. Limit based upon 180 MMBtu/hr equals 0.204 lb/MMBtu. Two boilers rated at 165 MMBtu/hr and equates to a 0.2095 lb/MMBtu limit.
1. Replace COMS language with the revised "NEW COMS" language from Library. COMS installed Nov. 2001.
2. Replace coal quality sampling language with revised coal quality language from Library. No substantive change.

3. Addition of CAM as applicable rule. Addition of CAM MRR language. Facility proposed 22% opacity trigger for CAM. Facility based the trigger on the assumption that the 35% opacity limit would remain until the ICI boiler MACT compliance date. I used an 18% opacity trigger based upon the stack test data.

B003

1. Remove the 35% opacity limit established by the EVEL process in 1984. Added a 20% opacity limit per rule and the associated testing. Facility tested in 2003 and 2005 without justifying a continuing need for the EVEL. Please see the attached e-mail between Todd Brown and John Summerhays.
2. Update the PE limit from 17-10 because one boiler was shutdown. Two units tested at 180 MMBtu/hr each during the last two stack tests. Limit based upon 180 MMBtu/hr equals 0.204 lb/MMBtu. Two boilers rated at 165 MMBtu/hr and equates to a 0.2095 lb/MMBtu limit.
1. Replace COMS language with the revised "Existing COMS" language from Library. COMS installed 1992.
2. Replace coal quality sampling language with revised coal quality language from Library. No substantive change.
3. Addition of CAM as applicable rule. Addition of CAM MRR language. Facility proposed 22% opacity trigger for CAM. Facility based the trigger on the assumption that the 35% opacity limit would remain until the ICI boiler MACT compliance date. I used an 18% trigger based upon the stack test data.

P003

1. Updated the compliance method for the PE limit in the testing section. Added a AP-42 emission factor in addition to the optional testing requirement.

From: Todd Brown
To: summerhays.john@epa.gov
Date: Fri, May 6, 2005 9:21 AM
Subject: EVEL language in Ohio's SIP

John,
Please tell me what I need to do, if anything, to get the slate wiped clean with regards to previous EVEL determinations that have been included in

the SIP. Ohio EPA agrees that the SIP language should be changed to eliminate any confusion with regards to an EVEL expiring with the permit, and not being recognized on the permit renewal (unless, of course, the facility goes through the EVEL determination process again). For the time being, Ohio EPA is going to notify the companies that have EVELs, upon permit renewal, that current EVELs are no longer recognized once the permit is renewed (again, unless they have followed the latest version of EG 13 with regard to developing EVELs). The companies will then have to go through this process each time the permit is renewed. Thank you for your help with this matter, and again, let me know what I need to do with regards to the SIP language.

Todd Brown
Ohio EPA
614.644.4839

>>> <Summerhays.John@epamail.epa.gov> 02/04/05 9:47 AM >>>

Todd,

This is in response to your January 27 question regarding removing an outdated site-specific EVEL. EPA understands that the situation is as follows: Recent testing shows that the EVEL is no longer necessary, and OEPA believes that the EVEL should be withdrawn and the facility should be subject to the general Ohio opacity rules. The specific EVEL limit is included in a state operating permit that was approved as part of the SIP. Despite expiration of that permit, the permit remains referenced in the SIP, as codified in 40 CFR 52.1870.

Based on the above, my suggestion is that OEPA put the normal opacity limit into the facility's current or new Title V permit (either by amendment of the existing permit or by writing the permit renewal that way). This appears to be appropriate both at the State and Federal level. At the State level, we believe that your rules and engineering guides give authority to remove or tighten an EVEL at any time evidence becomes available that such a change is warranted. Indeed, as I recall, we have agreed that EVELs are subject to review at the time of each Title V permit renewal based on testing conducted in anticipation of that renewal. At the federal level, we can concur that the applicability of the SIP provision expired when this approved permit and its conditions expired. There is no need or basis to include an EVEL that is not warranted into a renewed permit. Therefore, we believe that

OEPA has full authority to issue the facility a Title V permit without an EVEL.

Also, in order to lessen opportunity for confusion, and to clarify the SIP, I recommend that we take steps to amend the SIP to remove this company's provision for its alternate limits. Your inquiry is timely, because we are currently reviewing a SIP submittal from Ohio that would authorize the State to issue EVELs to companies in accordance with specified criteria (mostly given in Engineering Guides 13 and 15) without SIP review. As we take this step of granting Ohio authority to issue new EVELs, it seems to me we also have an opportunity to grant Ohio the authority to manage the old EVELs as well. It seems logical to grant Ohio authority not only to issue new EVELs but also to remove or update old ones. Indeed, I would suggest that I essentially remove all the old EVELs from the SIP--wipe the slate clean. At the same time, I would clarify that companies have EVELs if and only if Ohio has included an EVEL in their current Title V permit in accordance with the Engineering Guides, and in accordance with the most recent evidence as to whether an EVEL is warranted. I have the opportunity to propose this in conjunction with proposing action on Ohio's SIP submittal. I welcome Ohio's reaction to this suggestion.