

Statement of Basis For Title V Permit

Part I - General	
Company Name	SMART Papers LLC
Premise Number	1409040212
What makes this facility a Title V facility?	SO2, NOx, CO, PE, HAP (HCl)
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)	Emissions unit B020 PTI 14-03938 modification (relaxation of MRR), emissions unit K004 PTI 14-04176 modification (change to emission limitation, relaxation of MRR), emissions unit K005 PTI 14-04409 modification (change to emission limitation, relaxation of MRR), relaxation of MRR to various emission units(B010, F003, K001-K027, P009, P010, P012-P019) in Title V permit due to appeal and settlement (ERAC Case #095305), and change of emissions unit P901to insignificant.
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		<u>Comments</u>
	SIP (3745-)	Other	
A.1.	77-07(F)(2)	N	Permittee requested inclusion of facility-wide negative declarations in the permit.
A.2.	N	40 CFR 61.145	Facility is subject to asbestos renovation and demolition activity requirements.
A.3.	N	40 CFR 82.150	Permittee is subject to class I or class II refrigerant handling and disposal requirements of 40 CFR Part 82.150.

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	<u>Comments</u>
		SIP (3745-)	Other												
B010	Annual NOx Budget Allowance	14-05	N	N	N	Y	N	N	Y	N	Y	N	Y	N	B010 is a non-electrical generating emissions unit participating in the NOx Budget Trading Program under OAC Chapter 3745-14.
B010	20% opacity	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET: B010 has a certified COMS.
B010	0.11 lbs PE/mmBtu	17-10(C)	N	N	N	N	N	N	N	N	N	N	Y	N	M, R, Rp: Use of certified COMs and COMs excess emission reports as surrogate for compliance. PE testing required 2x per permit cycle.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B010	1.7 lbs SO2/mmBtu	18-15(L)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: B010 and B020 are required to comply with a combined daily average operating rate to ensure compliance with SO2 emissions. ET: Compliance determined by record keeping of fuel analyses and sulfur content.
B010 and B020	Industrial Boiler MACT Subpart DDDDD	N	40 CFR 63	N	N	N	N	N	N	N	N	N	N	Y	M, R, Rp, ET, Misc: B010 and B020 will be subject to applicable requirements of 40 CFR 63 Subpart DDDDD on the 9/13/2007 compliance date.
B010 and B020	CAM	N	40 CFR 64	N	N	Y	N	N	Y	N	Y	N	N	N	ET: Not applicable to CAM based upon emissions units subject to 40 CFR 63 Subpart DDDDD. However, the requirements are not effective until 9/13/2007. In the mean time, B010 and B020 will employ certified COMs and ESP power indicators to comply with the requirements of 40 CFR 64.
B020	118 TPY PE	N	3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	Y	N	M, R, Rp: Use of certified COMs and COMs excess emission reports as surrogate for compliance. PE testing required 2x per permit cycle.
B020	0.072 lb PM10/mm Btu and 77.2 TPY PM10	N	3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: Emission limitation(s) are based on the emissions unit's potential to emit.
B020	1854 TPY SO2	N	3745-31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: B010 and B020 are required to comply with a combined daily average operating rate to ensure compliance with SO2 emissions. B020 has additional restrictions when co-firing with tire derived fuel. ET: Compliance determined by record keeping of fuel analyses and sulfur content.
B020	163.5 lbs NOx/hr and 716 TPY NOx	N	3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: Emission limitation(s) are based on the emissions unit's potential to emit.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B020	51.0 lbs CO/hr and 223 TPY CO	N	3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: Emission limitation(s) are based on the emissions unit's potential to emit.
B020	1.12 lbs NMOC/hr and 4.9 TPY NMOC	N	3745-31-05 (A)(3)	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: Emission limitation(s) are based on the emissions unit's potential to emit.
B020	20% opacity	17-07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET: B020 has a certified COMS.
B020	0.11 lb PE/mmBtu	17-10(C)	N	N	N	N	N	N	N	N	N	N	Y	N	M, R, Rp: Use of certified COMs and COMs excess emission reports as surrogate for compliance. PE testing required 2x per permit cycle.
B020	1.7 lbs SO2/mmBtu	18-15(L)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: B010 and B020 are required to comply with a combined daily average operating rate to ensure compliance with SO2 emissions. B020 has additional restrictions when co-firing with tire derived fuel. ET: Compliance determined by record keeping of fuel analyses and sulfur content.
F003	20% opacity	17-07(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET: no visible emission testing unless a problem is identified by weekly monitoring
F003	use of RACM	17-08(B)	N	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: Use of weekly monitoring for presence of VEs as surrogate for use of RACM. No visible emission testing unless a problem is identified by weekly monitoring.
K001 - K027	2.9 lbs VOC/gal coating content	21-09(F)	N	N	N	Y	N	N	Y	N	Y	N	Y	N	
K001 - K003, K008 - K027	0.2 kg organic HAP per kg coating solids	N	40 CFR 63 JJJJ	N	N	Y	N	N	Y	N	Y	N	N	N	ET: Compliance with emission limitation determined by monitoring and record keeping requirements of coatings used pursuant to Subpart JJJJ.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
K004 - K007	0.2 kg organic HAP per kg coating solids	N	40 CFR 63 JJJJ	Y	N	N	N	N	N	N	N	N	N	N	ND: Paper making on-machine coating is exempt from Subpart JJJJ.
K004, K005	211 lbs VOC/hour	N	31-05 (A)(3)	N	N	N	N	N	N	N	N	N	N	N	M, R, Rp, ET: Emission limitation(s) are based on the emissions unit's potential to emit.
K004	16.25 TPY VOC	N	31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	ET: Compliance with emission limitation determined by monitoring and record keeping requirements.
K005	16.25 TPY VOC	N	31-05 (C)	N	Y	Y	N	N	Y	N	Y	N	N	N	ET: Compliance with emission limitation determined by monitoring and record keeping requirements.
P009	20% opacity	17- 07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET: No visible emission testing unless a problem is identified by the scrubber monitoring
P009	5.18 lbs PE/hr	17- 11(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET: Not technically feasible to test this emissions unit. Compliance to be determined by monitoring and record keeping of scrubber performance.
P010	25.84 lbs PE/hr and 25.84 lbs PM10/hr	N	31-05 (A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: Maximum hourly trim production rate to ensure compliance with emission limitation ET: Emission limitation is based on worst case source test data. Compliance will be demonstrated by record keeping.
P010	20% opacity	17- 07(A); 17- 07(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET: No visible emission testing unless a problem is identified by the baghouse monitoring.
P010	Use of RACM	17- 08(B)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET: Record keeping (baghouse) will demonstrate compliance with use of RACM.
P010	10.65 TPY PE and 10.65 TPY PM10	N	31-05 (C)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: Maximum annual trim production rate to ensure compliance with emission limitation. ET: Emission limitation is based on worst case source test data. Compliance will be demonstrated by record keeping.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P012 - P015, P018	None	21- 07(G)(2)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: No photochemically reactive materials (PRM) shall be employed in these emissions units. ET: Compliance with no PRM usage demonstrated by record keeping.
P016, P017, P019	20% opacity	17- 07(A)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET: No visible emission testing unless a problem is identified by the baghouse monitoring.
P016	6.7 lbs PE/hour	17- 11(B)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET: Emission limitation is less than the emissions unit's controlled potential to emit. No emission testing unless a problem is identified by the baghouse monitoring.
P017	3.26 lbs PE/hour	17- 11(B)(1)	N	N	Y	Y	N	N	Y	N	Y	N	N	N	OR: Maximum process weight rate of emissions unit to ensure compliance with emission limitation. ET: Emission limitation is less than the emissions unit's controlled potential to emit. No emission testing unless a problem is identified by the baghouse monitoring.
P019	6.76 lbs PE/hour	17- 11(B)(1)	N	N	N	Y	N	N	Y	N	Y	N	N	N	ET: Emission limitation is less than the emissions unit's controlled potential to emit. No emission testing unless a problem is identified by the baghouse monitoring.

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.