



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

02/29/00

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

08-57-19-0134

Fraser Paper Inc., West Carrollton Mill
HAROLD NELSON
51 SOUTH ELM STREET
WEST CARROLLTON, OH 45449

Dear HAROLD NELSON:

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 RAPCA within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

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 or comments concerning this draft Title V permit, please contact RAPCA.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA (electronic)
Jim Orlemann, DAPC Engineering
Michael Ahern, DAPC PMU
RAPCA
Indiana
Kentucky



Ohio EPA

State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 02/29/00

Effective Date:

Expiration Date:

The duration of this permit will be five years.

This document constitutes issuance to:

Fraser Paper Inc., West Carrollton Mill
51 SOUTH ELM STREET
WEST CARROLLTON, OH 45449

of a Title V permit for Facility ID: 08-57-19-0134

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

B001 (#5 BOILER)

130 MMBTU/HR PULVERIZED COAL FIRED BOILER

B004 (#6 BOILER)

196 MMBTU/HR NATURAL GAS FIRED STANDBY BOILER

B005 (#7 BOILER)

100 MMBTU/HR MULTI FUEL FIRED BOILER [PRIMARYLY COAL AND PAPER SLUDGE]

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 3745-77-04(A) 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:

RAPCA
451 West Third Street
PO Box 972
Dayton, OH 45422
(937) 225-4435

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - 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.
- 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.6 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - 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 are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

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 CFR 68.215(a), the permittee shall submit either of the following:

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

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.

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.

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. 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.

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.

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.

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.

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 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.

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.

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 appropriate Ohio EPA District Office or local air agency and to the Administrator of U.S. EPA in the following manner 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 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.

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.

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).

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.

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, except that no such notice shall be required for changes that qualify as insignificant emission 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; and
- 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.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

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.

18. 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.

B. State Only Enforceable Section

1. 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.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. 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).

4. 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.

5. 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.

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

1. The facility is hereby notified that this permit and all Agency records concerning the operation of this permitted source are subject to public disclosure in accordance with OAC rule 3745-49-03.
2. The following insignificant emissions units are located at this facility:

F001: Coal Storage
F002: Roadways and Parking Lots
F003: Landfill Roadways
P001: Starch System
P004: Fly Ash Handling System
P005: Fly Ash Handling System
P901: Limestone Storage Silo
P902: Sand Storage Silo
Z001: Rhone Poulenc 321
Z002: Cytec 1820 & MX60
Z003: Callaway 915A
Z004: Pensize
Z005: Degreaser - Janitorial Products
Z006: Texo 1003
Z007: Shell Nonatell MT 1210M
Z008: Betz CDI B871
Z009: Betz RX 52A
Z010: Loucophour B302 Liq. & Phorwhite P
Z011: Dyes
Z012: WD40
Z013: Swift 45675
Z014: Misc. Coatings

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: #5 BOILER (B001)

Activity Description: 130 MMBTU/HR PULVERIZED COAL FIRED 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>
130 mmBtu/hr Pulverized Dry Bottom Boiler with Cyclone and Wet Scrubber; Boiler #5	OAC rule 3745-18-63(L)	1.6 lbs sulfur dioxide (SO2)/mmBtu of actual heat input
	OAC rule 3745-17-10 (C)(1)	0.18 lb particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-17-07 (A)	Opacity shall not exceed 20 percent, as a 6-minute average, except for one 6-minute period in any one hour when up to 60 percent is permissible.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The quality of the coal burned in this emissions unit shall meet a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation specified in Section A.1. above.
- The pressure drop across the scrubber shall be continuously maintained at a value of no less than 6.5 inches of water at all times while the emissions unit is in operation.
- The scrubber water flow rate shall be continuously maintained at a value of no less than 39 gallons per minute at all times while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; 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 Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

2. The permittee shall maintain monthly records of the total quantity of coal received, the results of the analyses for ash content, sulfur content, heat content, and the calculated sulfur dioxide emission rate, in lbs/mmBtu.
3. The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The pressure drop across the scrubber, in inches of water, on a once/shift basis.
- b. The scrubber water flow rate, in gallons per minute, on a once/shift basis.
- c. The down time for the control device, monitoring equipment, and the associated emissions unit.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record which shows a deviation of the allowable sulfur dioxide emission limitation. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the exceedance occurs.
2. The permittee shall submit written deviation (excursion) reports in accordance with paragraph A.1.c. of the General Terms and Conditions that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
 - a. the static pressure drop across the scrubber; and
 - b. the scrubber water flow rate.

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 Limitation -
1.6 lbs SO₂/mmBtu of actual heat input

Applicable Compliance Method -

Compliance shall be based upon the monitoring and record keeping requirements specified in Sections A.III.1 and A.III.2 and the use of the equation contained in OAC rule 3745-18-04(F)(1).

If required, the permittee shall demonstrate compliance pursuant to the test methods and procedures outlined in OAC rule 3745-18-04(D)(1).

- 1.b** Emission Limitation -
0.18 lb PE/mmBtu of actual heat input

Applicable Compliance Method -

Compliance shall be based on the results of the stack testing required in Section A.V.2 of this permit.

- 1.c** Emissions Limitation-
Opacity shall not exceed 20 percent, as a 6-minute average, except for one 6-minute period in any one hour when up to 60 percent is permissible

Applicable Compliance Method-

If required, visible emission evaluations using the methods and procedures specified in USEPA Reference Method 9 shall be taken while the emissions unit is in operation by a qualified observer, certified in accordance with USEPA RM 9, 40 CFR Part 60, Appendix A, Section 3., Qualifications and Testing.

- 2.** Approximately 6 months after permit issuance and within 6 months prior to permit renewal, the permittee shall conduct, or have conducted, performance testing for the emissions unit to demonstrate compliance with the allowable mass emissions rate for particulates. The emissions test(s) shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-17-03. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to assure that the emissions unit operation and 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 and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

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>
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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: #6 BOILER (B004)

Activity Description: 196 MMBTU/HR NATURAL GAS FIRED STANDBY 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>
196 mmBtu/hr Natural Gas/ No. 2 Fuel Oil-Fired Standby Boiler, Boiler #6	OAC rule 3745-17-10 (B)(1)	0.020 lb particulate emissions (PE)/mmBtu of actual heat input
	OAC rule 3745-18-06(D)	1.6 lbs SO ₂ /mmBtu of actual heat input
	OAC rule 3745-17-07(A)	Opacity shall not exceed 20 percent, as a 6-minute average, except for one 6-minute period in any one hour when up to 60% is permissible.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall only operate this emissions unit as "stand-by fuel burning equipment," defined as "any fuel burning equipment which is used only as a direct substitution for other fuel burning equipment for a limited period due to unpredictable and unavoidable breakdown or failure, or routine scheduled maintenance of such other fuel burning equipment" in OAC rule 3745-17-01(B)(20).
- The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in Section A.I. above.
- The permittee shall burn only natural gas and/or number two fuel oil in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

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 lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier. When a shipment of oil is received with a sulfur content that would result in a calculated sulfur dioxide emission rate higher than the allowable emission rate, the permittee shall maintain monthly records of the calculated sulfur dioxide emission rate based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all shipments of oil for only those months when oil is combusted in this emissions unit.
2. 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, D4294, D6010), or equivalent methods as approved by the Director.
3. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
4. The permittee shall keep records of when this emissions unit was in operation, which emissions unit this boiler was substituting for, and the reason for the substitution.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon a volume-weighted average of 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 (the appropriate Ohio EPA District Office or local air agency) within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any record which shows the operation of this emissions unit as a "stand-by fuel burning equipment," the emissions unit that this boiler is substituting for, and the reason for the substitution. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 45 days after the operation occurs.

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:
0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method-

When firing natural gas, compliance shall be based upon multiplying the maximum hourly gas burning capacity of the emissions unit (0.08 mm cubic feet/hr) by the natural gas emission factor [from AP-42, Chapter 1.4 (revised 7/98)] of 1.9 lbs PE (filterable)/mm cubic feet, and then dividing by the maximum hourly heat input capacity of the emissions unit (196 mmBtu/hr).

When firing No. 2 oil, compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (1,412 gallons/hr) by the emission factor for No. 2 oil [from AP-42, Chapter 1.3 (revised 9/98)] of 2.0 lbs PE (filterable)/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (196 mmBtu/hr).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
1.6 lbs SO₂/mmBtu of actual heat input

Applicable Compliance Method:

When firing fuel oil, 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.

When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate compliance with the 1.6 lbs SO₂/mmBtu limitation in accordance with method 6 of 40 CFR Part 60, Appendix A.

- 1.c** Emission Limitation:
Opacity shall not exceed 20 percent, as a 6-minute average, except for one 6-minute period in any one hour when up to 60% is permissible

Applicable Compliance Method:

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

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>
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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: #7 BOILER (B005)

Activity Description: 100 MMBTU/HR MULTI FUEL FIRED BOILER [PRIMARYLY COAL AND PAPER SLUDGE]

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>
100 mmBtu/hr Bubbling Fluidized Bed Boiler That Fires a Combination of Coal, Paper/Deinking Mill Sludge, Natural Gas, No. 2 Fuel Oil, and Wood Pallets, With Baghouse; Boiler #7	OAC rule 3745-31-05 (D) PTI 08-0347	0.37 lb sulfur dioxide (SO ₂)/mmBtu of actual heat input, as a rolling, 30-day average
		162.06 TPY SO ₂ , as a rolling, 365-day summation
		0.20 lb nitrogen oxides (NO _x)/mmBtu, as a rolling, 30-day average
		87.60 TPY NO _x , as a rolling, 365-day summation
		0.05 lb particulate emissions (PE)/mmBtu of actual heat input
	40 CFR 60, Subpart Dc	21.90 TPY PE
		90 % SO ₂ reduction efficiency, as a rolling, 30-day average
		See Section A.2.g below.
		See Section A.2.e below.
		See Section A.2.f below.
OAC rule 3745-17-10 (C)(1) OAC rule 3745-17-07 (A) OAC rule 3745-18-63 (A)	See Section A.2.f below.	
	See Section A.2.g below.	
	See Section A 2.e below.	

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-31-05(A)(3) PTI 08-3477	0.25 lb carbon monoxide (CO)/mmBtu of actual heat input 109.5 TPY CO Visible emissions shall not exceed 10% opacity, as a 6-minute average.

2. Additional Terms and Conditions

- 2.a** The primary fuels of this emissions unit are coal and paper/deinking mill sludge. Therefore, the permittee must demonstrate compliance with 40 CFR Part 60.42c (e)(1) and (e)(2). These requirements represent a SO2 emission rate and reduction efficiency more stringent than or as stringent as those for all other fuel combinations specified in 40 CFR Part 60.42c.
- 2.b** The SO2 emissions from this emissions unit shall be controlled through the dry scrubbing provided by the calcium carbonate in the paper/deinking mill sludge and shall be sufficient to comply with the allowable SO2 emission rate and percent reduction limitations specified in Section A.I.1 of this permit.
- 2.c** Pursuant to OAC rule 3745-23-06 (B), the NOx emissions from this emissions unit shall be controlled through a combination of fluidized bed combustion and ammonia injection and shall be sufficient to comply with the allowable NOx emission rate limitation specified in Section A.I.1 of this permit.
- 2.d** The PE from this emissions unit shall be controlled through the application of a baghouse with a removal efficiency that is sufficient to comply with the allowable particulate emission rate limitation specified in Section A.I.1 of this permit.
- 2.e** The lbs SO2/mmBtu of actual heat input emission limitations based on 40 CFR Part 60, Subpart Dc and OAC rule 3745-18-63 (A) are less stringent than the SO2 emission limitation established pursuant to the best available technology requirement of OAC rule 3745-31-05 (D).
- 2.f** The lb PE/mmBtu emission of actual heat input limitations based on 40 CFR Part 60, Subpart Dc and OAC rule 3745-17-10 (C)(1) are less stringent than the PE limitation established pursuant to the best available technology requirement of OAC rule 3745-31-05 (D).
- 2.g** The opacity limitation based on OAC rule 3745-17-07 (A) is less stringent than the opacity limitation established pursuant to 40 CFR Part 60, Subpart Dc.
- 2.h** In accordance with 40 CFR 60.42c(I), the SO2 emission limit and percent reduction requirements shall apply at all times, including periods of startup, shutdown, and malfunction.

II. Operational Restrictions

- 1.** The maximum firing rate of wood pallets shall not exceed 10 per day.
- 2.** The quality of coal and sludge burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in Section A.1. above.
- 3.** The use of paper sludge generated from a site other than Fraser Papers, Inc., Ohio EPA ID 0857190134, in this emissions unit is specifically prohibited, unless a permit to install is first obtained in accordance with OAC rule 3745-31-02.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect a representative grab sample of each shipment of the coal that is received for burning in this emissions unit. The permittee shall perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples collected during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed the coal sample for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; 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 Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

2. The permittee shall collect a representative grab sample each day of the sludge that is generated for burning in this emissions unit. The permittee shall perform the sludge sampling and analyses in accordance with the following procedures:
 - a. Collect* and weigh each daily grab sample of the "as-fired" sludge.
 - b. Record the % solids**.
 - c. Dry the "as-fired" sludge sample.
 - d. Calculate and record the % moisture.

At the end of each calendar month, all of the dried, grab samples collected during that calendar month shall be combined into one composite sample.

Each monthly composite sample of sludge shall be analyzed for sulfur content (percent) and heat content (Btu/pound of sludge). The analytical methods for sulfur content and heat content shall be ASTM method D129, Standard Test for Sulfur in Petroleum Products (General Bomb Method) and ASTM method D240*, Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter, (* modified to a minimum of four tests with a calculated average), respectively. Alternative, equivalent methods may be used based upon written approval by the appropriate Ohio EPA District Office or local air agency.

* The sludge should be collected at the screw press discharge before it is placed on the bunker or any conveyors.

** The permittee shall employ Method 2540G (Total, Fixed and Volatile Solids in Solid and Semisolid Samples) found in "Standard Methods for the Examination of Water and Wastewater" to measure the % solids.

3. The permittee shall require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency. 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.

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

4. The permittee shall maintain monthly records of the following information:
 - a. the total quantity of coal received and the results of the monthly analyses for ash content, sulfur content, and heat content;
 - b. the total quantity of sludge generated and the results of the monthly analyses for sulfur content and heat content; and
 - c. the total quantity of oil received and the results of the oil supplier's analyses for sulfur content and heat content.

5. The permittee shall operate and maintain equipment to continuously monitor and record SO₂ emissions (in parts per million and pounds per hour) from this emissions unit . Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous SO₂ monitoring system including, but not limited to, parts per million SO₂ on an instantaneous (one-minute) basis, emissions of SO₂ in pounds for each hour and each day of operation, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

6. The permittee shall follow the facility's written quality assurance/quality control plan for the continuous SO₂ monitoring system designed to ensure continuous valid and representative readings of SO₂. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous SO₂ monitoring system must be kept on site and available for inspection during regular office hours.
7. The permittee shall submit information detailing the proposed location of the sampling site(s) in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 6 for approval by the Ohio EPA, Central Office.

Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after the initial startup, the permittee shall conduct certification tests of the continuous SO₂ monitoring system pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6. Personnel from the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the appropriate Ohio EPA District Office or local air agency within 30 days after the test is completed. Copies of the test results shall be sent to the appropriate Ohio EPA District Office or local air agency and the Ohio EPA, Central Office. Certification of the continuous SO₂ monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6.

In accordance with 40 CFR 60.46c(c)(3), the span value of the SO₂ CEMS at the outlet of the steam generating unit shall be 50 percent of the maximum estimated hourly potential SO₂ emission rate of the fuel combusted.

8. The permittee shall operate and maintain equipment to continuously monitor and record NO_x, in parts per million and pounds per hour, from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous NO_x monitoring system including, but not limited to, parts per million NO_x on an instantaneous (one-minute) basis, emissions of NO_x in pounds for each hour and each day of operation, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

10. The permittee shall follow the facility's written quality assurance/quality control plan for the continuous NO_x monitoring system designed to ensure continuous valid and representative readings of NO_x emissions in units of the applicable standard. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous NO_x monitoring system must be kept on site and available for inspection during regular office hours.

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

11. The permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 6 for approval by the Ohio EPA, Central Office.

Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after the initial startup, the permittee shall conduct certification tests of such equipment pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6. Personnel from the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the appropriate Ohio EPA District Office or local air agency within 30 days after the test is completed. Copies of the test results shall be sent to the appropriate Ohio EPA District Office or local air agency and the Ohio EPA, Central Office. Certification of the continuous NO_x monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6.

12. The permittee shall operate and maintain the continuous opacity monitoring system 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.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) basis, daily zero/span calibration checks, and manual calibration adjustments.

13. The permittee shall follow the facility's 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.

14. The permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 1 for approval by the Ohio EPA, Central Office.

Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after the initial startup, the permittee shall conduct certification tests on the continuous opacity monitoring system equipment pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 1. Personnel from the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to the appropriate Ohio EPA District Office or local air agency pursuant to OAC rule 3745-15-04 within 30 days after the test is completed. Certification of the continuous opacity monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I), and 40 CFR Part 60, Appendix B, Performance Specification 1 including section 5.1.9 (mandatory).

In accordance with 40 CFR 60.47c(b), the span value of the opacity COMS shall be between 60 and 80 percent.

In accordance with 40 CFR 60.46c(c)(2), the permittee shall perform quarterly accuracy determinations and daily calibration drift test in accordance with Procedure 1 (appendix F).

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

15. The permittee shall maintain records of the following information on a daily basis for this emissions unit:
- the identification of each type of fuel burned;
 - the quantity of each fuel type burned (in tons for coal, wood pallets*, and sludge** and in mm scfm and gallons for natural gas and no. 2 fuel oil, respectively);
 - the controlled SO₂ emission rate, in pounds, i.e., the summation of each hourly emission rate, as recorded according to Section A.III.5, for that day;
 - the rolling, 365-day, summation of the controlled SO₂ emission rate, in tons, i.e., the summation of A.III.15.c for that day and the previous 364 days, divided by 2000;
 - the NO_x emission rate, in pounds, i.e., the summation of each hourly emission rate, as recorded according to Section A.III.8, for that day; and
 - the rolling, 365-day, summation of the NO_x emission rate, in tons, i.e., the summation of A.III.15.e. for that day and the previous 365 days, divided by 2000.

* The permittee shall also keep daily records of the number of wood pallets employed.

** For sludge, record the weight with water and the weight without water, in tons.

16. The permittee shall maintain records of the following information on a monthly basis for this emissions unit:
- the heat content of each fuel burned during the month (in Btu/pound for coal, wood pallets, and sludge* and in mmBtu/mm scfm and Btu/gallon for natural gas and no. 2 fuel oil, respectively);
 - the total mmBtu heat input* for each day of the month, i.e., the summation of [(A.III.15.b) X (A.III.16.a)] for all fuels burned;
 - the sulfur content of each fuel burned, in percent by weight;
 - the potential (pre-controlled) SO₂ emissions, in pounds/day for each day of the month, i.e., the summation of [(A.III.15.b) x (A.III.16.c) x 2**] for all fuels burned; and
 - the potential (pre-controlled) SO₂ emissions, in lbs/mmBtu for each day of the month, i.e., (A.III.16.d)/(A.III.16.b).

* Use the dry weight of sludge when calculating the total heat input for sludge.

** The factor of 2 is used in the conversion from S to SO₂ since 32 lbs/lb-mole of sulfur will yeild 64 lbs/lb-mole of SO₂ (S + O₂ -->SO₂).

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

17. The permittee shall calculate and maintain records of the following for each day of operation of this emissions unit:
 - a. the daily controlled SO₂ emission rate, in pounds per mmBtu, i.e., (A.III.15.c) / (A.III.16.b);
 - b. the 30-day, rolling average controlled SO₂ emission rate, in pounds per mmBtu, i.e., the summation of (A.III.17.a) for that day and the previous 29 days divided by 30;
 - c. the daily SO₂ percent reduction, i.e., [(A.III.16.e - A.III.17.a) / A.III.16.e] X 100%;
 - d. the 30-day, rolling average percent reduction, i.e., the summation of (A.III.17.c) for that day and the previous 29 days divided by 30;
 - e. the daily NO_x emission rate, in pounds per mmBtu, i.e., (A.III.15.e) / (A.III.16.b); and
 - f. the 30-day, rolling average NO_x emission rate, in pounds per mmBtu; i.e., the summation of (A.III.17.d) for that day and the previous 29 days divided by 30.
18. The permittee shall perform daily visible particulate emissions evaluations (for any periods of time where the COM is out of service for 24 hours or longer) from the stack serving this emissions unit using the methods and procedures specified in USEPA Reference Method 9 by a qualified observer certified in accordance with USEPA RM 9, 40 CFR Part 60, Appendix A, section 3., Qualifications and Testing. The results of such visible emission readings shall be noted in an operations log.

IV. Reporting Requirements

1. The permittee shall submit the following information on a quarterly basis in accordance with 40 CFR 60.48c(e):
 - a. calendar dates covered in the reporting period;
 - b. each 30-day average SO₂ emission rate, calculated during the reporting period, ending with the last 30-day period in the quarter; reasons for noncompliance with the emission standard; and a description of corrective actions taken;
 - c. each 30-day average percent reduction of the potential (the pre-controlled emission rate, as calculated in A.III.13.) SO₂ emission rate calculated during the reporting period, ending with the last 30-day period in the quarter; reasons for noncompliance with the emission standard; and a description of corrective actions taken;
 - d. identification of any times when emissions data have been excluded from the calculation of average emission rates; justification for excluding data; and a description of corrective actions taken if data have been excluded for periods other than those during which coal or oil were not combusted in the steam generating unit;
 - e. identification of any times when the pollutant concentration exceeded the full span of the CEMS;
 - f. description of any modifications to the CEMS that could affect the ability of the CEMS to comply with Performance Specifications 2 or 3;
 - g. results of daily CEMS drift tests and quarterly accuracy assessments as required under appendix F, Procedure 1; and
 - h. copies of the oil supplier's analyses for oil which is received for burning in this emissions unit including the name of the oil supplier and a statement that the oil complies with the specifications in 40 CFR 60.41c.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter.

IV. Reporting Requirements (continued)

2. The permittee shall also submit the following information on a quarterly basis:
- a. the total quantity of coal burned, in tons;
 - b. the total quantity of sludge burned, in tons;
 - c. the total quantity of oil burned, in gallons;
 - d. the total quantity of natural gas burned, in cubic feet;
 - e. each 30-day average NO_x emission rate, calculated during the reporting period, ending with the last 30-day period in the quarter; reasons for noncompliance with the emission standard; and a description of corrective actions taken;
 - f. each 365-day rolling SO₂ emission rate, calculated during the reporting period, ending with the last 365-day period in the quarter; reasons for noncompliance with the emission standard; and a description of corrective actions taken; and
 - g. each 365-day rolling NO_x emission rate, calculated during the reporting period, ending with the last 365-day period in the quarter; reasons for noncompliance with the emission standard; and a description of corrective actions taken.

These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter.

3. The permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting all instances of opacity values in excess of the 10 percent limitation specified in Section A.I.1., 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).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting 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.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with 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, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter.

IV. Reporting Requirements (continued)

4. The permittee shall submit notification, to the appropriate OEPA District Office or local air agency, with the date of construction or reconstruction, anticipated startup, and actual startup in accordance with 40 CFR Part 60.48c (a) and Section A. of the General Terms and Conditions. The notification shall also include the following in accordance with 40 CFR part 60.48c (a):
 - a. the design heat input capacity of the affected facility and identification of the fuels to be combusted in the affected facility;
 - b. if applicable, a copy of any Federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels; and
 - c. the annual capacity factor at which the permittee anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
5. The permittee shall submit annual reports which specify the total PE and CO emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.
6. The permittee shall submit semi-annual written reports which identify all time periods during which the COM was out of service for 24 hours or longer and the visible emission readings recorded during this time exceeded 10% opacity, as a 6-minute average. 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 period.

V. Testing Requirements

1. Compliance with the emission limitation(s) in this permit shall be determined in accordance with the following method(s):
 - 1.a Emission Limitation -
0.37 lb/mmBtu SO₂, as a 30-day, rolling average

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section A.III.5. and Sections A.III.15 - A.III.17 of this permit.
 - 1.b Emission Limitation -
162.06 TPY SO₂, as a rolling, 365-day summation

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Section A.III.15 of this permit.
 - 1.c Emission Limitation -
0.20 lb/mmBtu NO_x, as a 30-day, rolling average

Applicable Compliance Method -
Compliance shall be based upon the record keeping as specified in Section A.III.8 and Sections A.III.15. - A.III.17 of this permit.
 - 1.d Emission Limitation -
87.60 TPY NO_x, as a rolling, 365-day summation

Applicable Compliance Method -
Compliance shall be based upon record keeping as specified in Section A.III.15 of this permit.
 - 1.e Emission Limitation -
0.05 lb PE/mmBtu of actual heat input

Applicable Compliance Method -
Compliance shall be based on the results of the stack testing required in Section A.V.2 of this permit.

V. Testing Requirements (continued)

- 1.f** Emission Limitation -
21.90 TPY PE

Applicable Compliance Method -

The 21.90 TPY limitation was developed by multiplying the 0.05 lb/mmBtu emission limitation by the maximum hourly heat input capacity of the emissions unit (100 mmBtu/hr) and by 8,760, and then dividing by 2000. Therefore, provided compliance is shown with the lb/mmBtu limitation, compliance will also be shown with the annual limitation.

- 1.g** Emission Limitation -
90 % SO₂ reduction efficiency, as a 30-day, rolling average

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in Sections A.III.15 - A.III.17 of this permit.

- 1.h** Emission Limitation -
0.25 lb/mmBtu CO

Applicable Compliance Method -

Compliance shall be based on the results of the stack testing required in Section A.V.2 of this permit.

- 1.i** Emission Limitation -
109.50 TPY CO

Applicable Compliance Method -

The 109.50 TPY limitation was developed by multiplying the 0.25 lb/mmBtu emission limitation by the maximum hourly heat input capacity of the emissions unit (100 mmBtu/hr) and the maximum operating schedule of 8,760 hrs/yr, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the lb/mmBtu limitation, compliance will also be shown with the annual limitation.

- 1.j** Emission Limitation -
10% opacity, as a 6-minute average

Applicable Compliance Method -

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B) (1) using the methods and procedures specified in USEPA Reference Method 9 (see Section A.III.14).

- 2.** Approximately 2.5 years after permit issuance and within 6 months prior to permit renewal, the permittee shall conduct, or have conducted, performance testing for the emissions unit to demonstrate compliance with the allowable mass emissions rate for particulate emissions and CO. The emissions test(s) for particulates and CO shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-17-03 and 40 CFR Part 60, Appendix A, Methods 1-4 & 10, respectively. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), this facility shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to assure that the emissions unit operation and 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 and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

Facility Name: **Fraser Papers, Inc.**

Facility ID: **08-57-19-0134**

Emissions Unit: **#7 BOILER (B005)**

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>
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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

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