

Statement of Basis For Title V Permit

Company Name	MW Custom Papers, Inc.	
Premise Number	06-71-01-0028	
What makes this facility a Title V facility?	PM, SO2, NOx	
Has each insignificant emissions unit been reviewed to confirm it meets the definition in 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.	NA	

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
A.1.	25		Emission control action program.
A.2.		40 CFR Part 82	Subparts B and F as related to the operations at this facility.
A.3.	20	40 CFR Part 61	All asbestos renovation and demolition activities performed in accordance with applicable requirements.
A.4. through A.4.d		40 CFR Part 63.6(e)	Startup, Shutdown, and Malfunction Plan
A.5. through A.5.c		40 CFR Part 63	Condensate Collection and Treatment System

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 & Federally Enforceable Section)

Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
B001 B002 B003 B011	20% opacity	17-07 (A)		N	N	Y	N	N	Y	N	Y	N	N	N	M - Continuous opacity monitors R- Data recorded Rp- Quarterly reporting includes negative declaration
B014 B015 R004	20% opacity	17-07 (A)		N	N	Y	N	N	Y	N	Y	N	Y	N	M - Weekly VE Checks R - record VE conditions Rp - Semi-annual reports including corrective actions ET - Method 9
B013 P001 P005	20% opacity	71-07 (A)		N	N	N	N	N	N	N	N	N	Y	N	ET- Method 9
P901	20% opacity	71-07 (A)		N	N	N	N	N	N	N	Y	N	Y	N	Rp - Semi-Annual reports including corrective actions ET - Method 9
B001 B002 B003 B013	0.10 lb of PE per MMBtu	17-10 (C)(1)		N	N	N	N	N	N	N	N	N	Y	N	ET - Method 1-5 @ 2.5 yrs from permit issuance and 6 months prior to expiration.

B001 B002 B003	0.020 lb of PE per MMBtu, when firing No. 2 fuel oil			N	N	N	N	N	N	N		N	Y	N	ET - Compliance demonstrated through AP-42 emission factors. If required, Method 1 - 5.
B001 B002 B003	3.6 lbs of SO2 per MMBtu	18-77 (A)		N	N	Y	N	N	Y	N	Y	N	Y	N	M, R - Fuel oil analysis in accordance with Method 19 Rp - Quarterly reports on calculated SO2 emission rate ET - document each shipment of fuel oil meets the limitation

B011	See comment section	31-05 (A)(3)		N	N	Y	N	N	Y	N	Y	N	Y	N	<p>The permittee shall not discharge into the atmosphere any exhaust gases in excess of the following emission limitations:</p> <ul style="list-style-type: none"> i. 0.021gr/dscf of particulate emissions, corrected to 8% oxygen, on a dry basis; ii. 37.31 lbs/hr and 163.5 tpy of particulate emissions, corrected to 8% oxygen, on a dry basis; iii. 110 ppmv of nitrogen oxides (NOx), as a rolling, 30-day average, corrected to 8% oxygen, on a dry basis; iv. 211.6 lbs/hr and 712.9 tpy of NOx, corrected to 8% oxygen, on a dry basis; v. 300 ppmv of carbon monoxide (CO), corrected to 8% oxygen, on a dry basis; vi. 270.2 lbs/hr and 1,183.4 tpy of CO, corrected to 8% oxygen, on a dry basis; vii. 50 ppmv of volatile organic compounds (VOC), corrected to 8% oxygen, on a dry basis; viii. 25.7 lbs/hr and 112.7 tpy of VOC, corrected to 8% oxygen, on a dry basis; ix. 5 ppmv total reduced sulfur, as 12-hour average, corrected to 8% oxygen, on a dry basis; x. 5.5 lbs/hr and 24 tpy of total reduced sulfur, corrected to 8% oxygen, on a dry basis; xi. 55 ppmv of sulfur dioxide (SO2), corrected to 8% oxygen, on a rolling, 24-hour average; xii. 407.6 lbs/hr, as a 3-hour average, and 495.9 tpy of SO2, corrected to 8% oxygen, on a dry basis; xiii. 4.6 lbs/hr and 20.1 tpy of sulfuric acid, corrected to 8% oxygen, on a dry basis; and xiv. 0.0056 lb/hr and 0.0245 tpy of lead, corrected to 8% oxygen, on a dry basis.
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B013	1.6 lbs of SO2 when using No 2 fuel oil	18-06 (D)		N	N	Y	N	N	Y	N	Y	N	Y	N	M, R - Fuel oil analysis to comply with sulfur limit Rp - Deviation reports within 45 days of exceedance of calculated emission limit ET - If required Method 1-4 and 6
B014 B015	0.39 lb of carbon monoxide (CO) per MMBtu of actual heat input 0.08 lb of nitrogen oxides (NOx) per MMBtu of actual heat input 0.008 lb of particulate emissions per MMBtu of actual heat input	31-05 (A)(3) 40 CFR Part 60, Subpart Db		N	N	Y	N	N	Y	N	Y	N	Y	N	M, R - Continuous emissions monitors for NOx and CO Rp - Deviations of NOx and CO limits within 30 days. Quarterly monitor downtime including negative declarations. ET - NOx and CO testing 2.5 yrs and 6 months prior to expiration. Testing for PE limit only if required.

F001	<p>No visible particulate emissions from the paved roadways and parking areas, except for one minute during any 60-minute observation period.</p> <p>No visible particulate emissions from the unpaved roadways and parking areas, except for 3 minutes during any 60-minute observation period.</p>	31-05 (A)(3)		N	N	Y	N	N	Y	N	Y	N	Y	N	<p>M, R - Daily inspections Rp - Quarterly Deviation reports citing if an inspection was not performed and if a control measure was not implemented. ET - Method 22</p>
P001	PE shall not exceed 19.15 lbs/hr	17-11 (B)		N	N	N	N	N	N	N	N	N	Y	N	ET - Method 1-5
P001 P005	0.15 g/dscm (0.064 gr/dscf) of particulate emissions, corrected to 10% oxygen	40 CFR Part 63, Subpart MM		N	N	N	N	N	N	N	N	N	Y	N	ET - Method 1-5

P005	<p>0.1 g of particulate emissions per kg of black liquor solids fired in the recovery boiler</p> <p>35.2 lbs/hr of particulate emissions</p> <p>154.3 tpy of particulate emissions</p> <p>0.0084 g of total reduced sulfur per kg of black liquor solids fired in the recovery boiler</p> <p>1.19 lbs/hr of total reduced sulfur</p> <p>5.2 tpy of total reduced sulfur</p> <p>2.14 lbs/hr of VOC</p> <p>9.4 tpy of VOC</p>	31-05 (A)(3)		N	N	N	N	N	N	N	N	N	Y	N	<p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart BB.</p>
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P008, P014, P015	See Comment Section	40 CFR Part 63, Subpart S		N	Y	Y	N	N	Y	N	Y	N	Y	N	The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart A - General Provisions, as specified in 40 CFR Part 63, Subpart S, Table 1.
P015	5 ppmv of total reduced sulfur	40 CFR Part 63, Subpart BB		N	Y	Y	N	N	Y	N	Y	N	Y	N	The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart A - General Provisions, as specified in 40 CFR Part 63, Subpart S, Table 1.
P016	The thermal oxidizer outlet methanol concentration shall be equal to or less than 20 ppmv, corrected to 10% oxygen.	40 CFR Part 63, Subpart S		N	Y	Y	N	N	Y	N	Y	N	Y	N	The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart A - General Provisions, as specified in 40 CFR Part 63, Subpart S, Table 1. Compliance with the emission limitations in section A.I.2.b of these terms and conditions shall be determined in accordance with the methods in 40 CFR Part 63.457. The methods required depend on the control option selected from the options given in section A.I.2.b of these terms and conditions.
P017	4.5 lbs/hr of chlorine 0.68 lb/hr of chlorine dioxide	31-05 (A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - The minimum pressure drop or pressure drop range across the scrubber, and the minimum scrubber water flow rate shall be determined during the initial performance test that demonstrates that the emission unit is in compliance. M - operate and maintain 2 chlorine monitors inside the chlorine dioxide plant and 1 chlorine monitor outside the chlorine dioxide plant for the detection of leaks Rp - Qutrly deviation reports of pressure drop and water flow rates ET - test methods and procedures specified in 40 CFR Part 60, Appendix A Methods 1 through 4 and 26A. Alternative approved test methods may be used with prior approval from the Ohio EPA
P320, P325, P330, P335, P400, P730, P791, P800	None	None		N	N	N	N	N	N	N	N	N	N	N	This emissions unit is an existing stationary source, located at a facility which is not in a "Priority 1" county as specified in OAC rule 3745-21-06(A). Therefore, the requirements of OAC rule 3745-21-07 do not apply to this emissions unit.

P350, P401, P500, P510, P630, P650, P670,	2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents	21-09 (F)		N	N	Y	N	N	Y	N	N	N	Y	N	M, R- a. the name and identification number of each coating, as applied; and b. the VOC content of each coating (excluding water and exempt solvents), as applied. Rp - Notify the Director of the use of any non-complying coatings within 30 days. ET - Formulation data or the procedures specified in 40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC content of coatings.
P401	8.82 lbs/hr of VOC 38.6 tpy of VOC	31-05 (A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	M, R - a. the company identification for each coating and clean up material employed; b. the number of gallons of each coating and clean up material employed; c. the organic compound content of each coating and clean up material, in pounds per gallon; d. the total VOC emissions of coating and clean up material employed, in pounds; e. the total number of hours the emissions unit was in operation; and f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (e)/(d), in pounds per hour (average). R - deviations of the average hourly emission rate within 30 days of the month in which they occurred. ET - Compliance demonstrated upon record keeping.
P500	11.64 tpy of volatile organic compound s (VOC) related to the modification n to increase production speed 57.08 tpy of VOC, total	31-05 (A)(3)		N	Y	Y	N	N	N	N	N	N	Y	N	M, R - a. the name and identification number of each coating, as applied; and b. the VOC content of each coating (excluding water and exempt solvents), as applied. ET - Compliance with these emission limitations is demonstrated by a one time calculation using the emission factor of 0.395 lb of VOC per ton of paper produced, determined in performance tests conducted in 1995 and 1996. With the changes covered by PTI 06-06470, the maximum paper production rate for this emissions unit was increased from 640.7 tons/day to 791.8 tons/day.

P670	21.2 lbs/hr of VOC 93 tpy of VOC	31-05 (A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>M, R - a. the company identification for each coating and clean up material employed;</p> <p>b. the number of gallons of each coating and clean up material employed;</p> <p>c. the organic compound content of each coating and clean up material, in pounds per gallon;</p> <p>d. the total VOC emissions of coating and clean up material employed, in pounds;</p> <p>e. the total number of hours the emissions unit was in operation; and</p> <p>f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (e)/(d), in pounds per hour (average).</p> <p>R - deviations of the average hourly emission rate within 30 days of the month in which they occurred.</p> <p>ET - Compliance demonstrated upon record keeping.</p>
P901	2.00 lbs/hr of PE 8.8 tpy of PE 0.67 lb/hr of VOC 2.9 tpy of VOC	31-05 (A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	<p>OR - The hot lime vent bin shall be operated under negative pressure at all times when the emissions unit is in operation. And, the minimum pressure drop or pressure drop range across the scrubber, and the minimum scrubber water flow rate shall be determined during the initial performance test that demonstrates that the emission unit is in compliance. That minimum pressure drop or pressure drop range across the scrubbers and minimum scrubber water flow rate shall be continuously maintained at all times while the emissions unit is in operation. Fugitive PE shall be eliminated or minimized.</p> <p>M, R - monitor the pressure drop across the hot lime vent bin and the slaker scrubber. Records shall be kept on an hourly basis of the operating pressure on the hot lime bin vent and of the differential pressure across the hot lime slaker scrubber on the caustic plant operator's log sheet.</p> <p>Rp - Qrtly deviations, Semi-annual VE's, Annual PE and VOC emissions.</p> <p>ET - Emission factor for PE and emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25; and</p>

P902	See Comment section for BAT	31-05 (A)(3)		N	N	Y	N	N	Y	N	Y	N	Y	N	BAT -The debarking operation shall be controlled by wet suppression at all times to eliminate the visible emissions of fugitive dust. The chipping operation emissions shall be vented to a cyclone at all times to eliminate the visible emissions of fugitive dust. The screening operation shall be enclosed to eliminate the visible emissions of fugitive dust. The conveying operations shall be enclosed and belt brushes shall be employed at all times to eliminate the visible emissions of fugitive dust. M, R - Weekly inspections Rp - Qrtly deviation reports including negative declarations ET - Compliance with the visible emission limitation for the material handling operations identified above shall be determined in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22.
R004	0.01 pound of VOC per gallon of coating, excluding water and exempt solvents 35.68 tpy of VOC	31-05 (A)(3)		N	Y	Y	N	N	Y	N	Y	N	Y	N	OR - use only natural gas M, R - VOC coating data/ record alternative fuel use/ daily VE operations log Rp - coating deviations within 30 days/ alternative fuel usage within 30 days/ semi-annual VE reports/ Annual VOC emissions report ET - Compliance based on record keeping.
T031	The permittee shall not store any volatile photochemically reactive materials	21-07 (D)		N	N	Y	N	N	Y	N	Y	N	N	N	M, R - The permittee shall maintain records that identify each liquid organic material stored in this emissions unit and whether or not it is a photochemically reactive material. Rp - The permittee shall submit a report identifying any time photochemically reactive materials were stored in this emissions unit. Each report shall be submitted within 30 days after the permittee determines that photochemically reactive materials were stored in this emissions unit.

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 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.
4. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

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