OhioEPA

State of Ohio Environmental Protection Agency

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

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

09/26/01

RE: Proposed Title V Chapter 3745-77 Permit
08-57-19-0001
Appleton Papers Inc.

Attn: Genevieve Damico AR-18J
United States Enviromental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Damico:

The proposed issuance of the Title V permit for Appleton Papers Inc., has been created in Ohio EPA's State Air Resources System (STARS) on 09/26/01, for review by USEPA. This proposed action is identified in STARS as 3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact Mike Ahern, DAPC Permit Management Unit supervisor at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

Thomas G. Rigo

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

cc: RAPCA
File, DAPC PMU

State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Issue Date: 09/26/01	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 08-57-19-0001 to:
Appleton Papers Inc.
1030 West Alex-Bell Rd.
West Carrollton, OH 45449

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

B001 (Boiler #3)
Natural gas fired package boiler - 90,000 lb steam/hr.

B002 (Boiler #2)
Coal fired spreader stoker boiler - 120,000 lb steam/hr.

B003 (Boiler #4)
Coal fired spreader stoker boiler - 161,000 lb steam/hr.

K001 (Paint Spray Booth)
Maintenance paint spray booth.

P002 (Starch Handling)
Bulk starch unloading from trucks or rail cars to silo and transfer to slurry tank.

P003 (Bottom Ash Silo #2)
Bottom Ash silo collects bottom ash from boiler #2

P004 (Bottom Ash Silo #4)
Bottom Ash silo collects bottom ash from boiler #4

P008 (C-Stage Bleaching)
C-Stage bleaching

P009 (Fly Ash Silo)
Fly ash silo collects ash from both coal fired boilers.

P011 (No. 92 Papermachine - Coater)
No. 92 Papermachine coater and air floatation dryer.

P013 (No. 91 Papermachine - Coater)
No. 91 Papermachine coater

P014 (No. 93 Papermachine - Coater)
No. 93 Papermachine coater and air floatation dryer.

P016 (No. 92 Papermachine - Wet End)
No. 92 Papermachine - wet end

P017 (E-Stage Bleaching)
E-Stage bleaching

P018 (H-Stage Bleaching)
H-Stage bleaching

P019 (Ansilex Clay Handling)
Bulk ansilex clay unloading from trucks or railcars to silo and transfer to either of two coating makedown tanks.

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 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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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.8 below if no deviations occurred during the quarter.
iii. Written reports, which identify any deviations from the federally enforceable <u>monitoring</u>, <u>recordkeeping</u>, <u>and reporting requirements</u> 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 the permittee is required to 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"), the permittee shall comply with the requirement to register such a 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 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. Insignificant Activity

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

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 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 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. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with

this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. 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).

6. 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.

7. 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.

8. Additional Reporting Requirements When There Are No Deviations of <u>Federally Enforceable</u> 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 following insignificant emission units are located at this facility:

F001 Fugitive Dust, Park Areas & Roadways
F003 Fugitive Dust, Coal Storage Area
F004 Fugitive Dust, Coal Dumping and Transfer
P010 Chlorine Storage and Distribution
P015 No. 91 Papermachine - Wet End
Z001 No. 93 Papermachine - Wet End
Z010 Procote Makedown
Z012 Fire Water Pump
Z013 High Density Towers
Z014 Oil Tanks
Z015 Cold Cleaning
Z017 Hydrochloric Acid

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.

2. 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.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #3 (B001)

Activity Description: Natural gas fired package boiler - 90,000 lb steam/hr.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
natural gas-fired package boiler - 129 mmBtu/hr; boiler no. 3	OAC rule 3745-17-10(B)(1)	0.020 pound of particulate emissions (PE) per mmBtu 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

2.a Since natural gas is the only fuel fired in this emissions unit, OAC Chapter 3745-18 is not applicable. Hence, there is no SO2 emission limitation for this emissions unit.

2.b The limitation of 0.020 pound of PE per mmBtu of actual heat input refers to the filterable portion of PE, as measured by USEPA Reference Test Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation-
0.020 pound of PE per mmBtu of actual heat input

Applicable Compliance Method-
Compliance may be determined by multiplying the maximum hourly natural gas burning capacity of the emissions unit (mm cu.ft/hr) by the AP-42, 5th Edition, Table 1.4-1 (revised 7/98) emission factor of 1.9 lbs PE (filterable)/mm cu.ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu per hour).

If required, the permittee shall demonstrate compliance with the emission limitation above pursuant to OAC 3745-17-03(B)(9).

1.b Emission Limitation-
20% opacity, as a 6-minute average

Applicable Compliance Method-
If required, compliance shall be demonstrated by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1).

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #2 (B002)

Activity Description: Coal fired spreader stoker boiler - 120,000 lb steam/hr.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
coal-fired spreader stoker boiler - 156 mmBtu/hr; boiler no. 2, with electrostatic precipitator	OAC rule 3745-17-10(C)(1)	0.13 pound of particulate emissions (PE) per 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.
	OAC rule 3745-18-63(K)	1.6 pounds of sulfur dioxide per mmBtu of actual heat input

2. Additional Terms and Conditions

2.a The limitation of 0.13 pound of PE per mmBtu of actual heat input refers to the filterable portion of PE, as measured by USEPA Reference Test Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

II. Operational Restrictions

1. The quality of the coal 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.1. above.

2. The permittee shall operate the ESP during any operation of this emissions unit, except during periods of startup and shutdown that are exempted pursuant to OAC 3745-17-07(A)(3)(a)(i) and 3745-17- 07(A)(3)(b)(i), or during malfunctions that are exempted pursuant to OAC 3745-17-07(A)(3)(c).

III. Monitoring and/or Record Keeping Requirements

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

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) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

2. The continuous opacity monitoring system consists of all the equipment used to acquire data and includes data recording/processing hardware and software.

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

3. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

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

5. 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 by the appropriate Ohio EPA District Office or local air agency.

6. The permittee shall maintain monthly records of the total quantity of coal received, and the results of the analyses for ash content, sulfur content, and heat content, and the calculated sulfur dioxide emission rate, in lb/mmBtu.

7. The permittee shall perform, at minimum, on a semi-monthly basis [for any periods of time where the COM is out of service for 24 hours or longer, the minimum Reference Method 9 evaluation frequency shall be not less than daily], when the emissions unit is in operation and when the weather conditions allow, visible emission evaluations from the stack serving this emissions unit using the methods and procedures specified in USEPA Reference Method 9. The results of the visible emissions readings shall be recorded and then maintained in an operations log.

IV. Reporting Requirements

1. Pursuant to 40 CFR Parts 60.7 and 60.13(h), 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 limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

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.

IV. Reporting Requirements (continued)

If there are no instances of opacity values in excess of the limitations 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 opacity exceedence reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

2. Quarterly reports shall be submitted concerning the quality and quantity of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:

a. the total quantity of coal received (tons);

b. the average ash content (percent) of the coal received;

c. the average sulfur content (percent) of the coal received;

d. the average heat content (Btu/pound) of the coal received; and

e. the average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received.

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

3. The permittee shall submit deviation (excursion) reports that identify all USEPA Reference Method 9 readings that exceeded the limitations in OAC rule 3745-17-07. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation-
0.13 pound PE per mmBtu of actual heat input

Applicable Compliance Method-
Compliance shall be based on the results of emission testing conducted in accordance with Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

1.b Emission Limitation-
1.6 pounds sulfur dioxide per mmBtu of actual heat input

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Section A.III and the equation contained in OAC rule 3745-18-04(F)(1).

If required, compliance with this mass emission limitation above shall be demonstrated pursuant to OAC rule 3745-18-04(D)(1).

1.c Emission Limitation-
20% opacity, as a 6-minute average

Applicable Compliance Method-
If required, compliance shall be demonstrated by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1).

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted by December, 2002 and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

c. The emissions tests shall be conducted in accordance with Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

d. The tests shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

3. Not later than 30 days prior to the proposed test date(s), the permittee 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 ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler #4 (B003)

Activity Description: Coal fired spreader stoker boiler - 161,000 lb steam/hr.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
coal-fired spreader stoker boiler - 245 mmBtu/hr; boiler no. 4, with electrostatic precipitator	OAC rule 3745-17-10(C)(1)	0.13 pound of particulate emissions (PE) per 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.
	OAC rule 3745-18-63(K)	1.6 pounds of sulfur dioxide per mmBtu of actual heat input

2. Additional Terms and Conditions

2.a The limitation of 0.13 pound of PE per mmBtu of actual heat input refers to the filterable portion of PE, as measured by USEPA Reference Test Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

II. Operational Restrictions

1. The quality of the coal 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.1. above.

2. The permittee shall operate the ESP during any operation of this emissions unit, except during periods of startup and shutdown that are exempted pursuant to OAC 3745-17-07(A)(3)(a)(i) and 3745-17- 07(A)(3)(b)(i), or during malfunctions that are exempted pursuant to OAC 3745-17-07(A)(3)(c).

III. Monitoring and/or Record Keeping Requirements

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

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) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

2. The continuous opacity monitoring system consists of all the equipment used to acquire data and includes data recording/processing hardware and software.

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

3. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

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

5. 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 by the appropriate Ohio EPA District Office or local air agency.

6. The permittee shall maintain monthly records of the total quantity of coal received, and the results of the analyses for ash content, sulfur content, and heat content, and the calculated sulfur dioxide emission rate, in lb/mmBtu.

7. The permittee shall perform, at minimum, on a semi-monthly basis [for any periods of time where the COM is out of service for 24 hours or longer, the minimum Reference Method 9 evaluation frequency shall be not less than daily], when the emissions unit is in operation and when the weather conditions allow, visible emission evaluations from the stack serving this emissions unit using the methods and procedures specified in USEPA Reference Method 9. The results of the visible emissions readings shall be recorded and then maintained in an operations log.

IV. Reporting Requirements

1. Pursuant to 40 CFR Parts 60.7 and 60.13(h), 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 limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

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.

IV. Reporting Requirements (continued)

If there are no instances of opacity values in excess of the limitations 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 opacity exceedence reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

2. Quarterly reports shall be submitted concerning the quality and quantity of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:

a. the total quantity of coal received (tons);

b. the average ash content (percent) of the coal received;

c. the average sulfur content (percent) of the coal received;

d. the average heat content (Btu/pound) of the coal received; and

e. the average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received.

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

3. The permittee shall submit deviation (excursion) reports that identify all USEPA Reference Method 9 readings that exceeded the limitations in OAC rule 3745-17-07. Each report shall be submitted within 30 days after the deviation occurs.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation-
0.13 pound PE per mmBtu of actual heat input

Applicable Compliance Method-
Compliance shall be based on the results of emission testing conducted in accordance with Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

1.b Emission Limitation-
1.6 pounds sulfur dioxide per mmBtu of actual heat input

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Section A.III and the equation contained in OAC rule 3745-18-04(F)(1).

If required, compliance with this mass emission limitation above shall be demonstrated pursuant to OAC rule 3745-18-04(D)(1).

1.c Emission Limitation-
20% opacity, as a 6-minute average

Applicable Compliance Method-
If required, compliance shall be demonstrated by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1).

V. Testing Requirements (continued)

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted by December, 2002 and within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for particulates.

c. The emissions tests shall be conducted in accordance with Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

d. The tests shall be conducted while the emissions unit is operating at its maximum rated capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

3. Not later than 30 days prior to the proposed test date(s), the permittee 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 ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Paint Spray Booth (K001)

Activity Description: Maintenance paint spray booth.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
maintenance paint spray booth: miscellaneous metal and non-metal parts	OAC rule 3745-31-05 (A)(3) PTI No. 08-2427	2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents 338 lbs/day, 1689 lbs/month, 10.1 TPY VOC, including cleanup The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-11(B) and 3745-17-07(A).
	OAC rule 3745-21-09(U)(1)(i)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-17-11(B)	0.551 lb particulate emissions (PE)/hr
	OAC 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.
	OAC rule 3745-21-07(G)	none (See Section A.II.4.)

2. Additional Terms and Conditions

2.a The limitation of 0.551 pound of PE per hour refers to the filterable portion of PE, as measured by USEPA Reference Test Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

2.b The limitations above include emissions of VOC from all of the VOC materials employed, excluding the materials documented in the September 5, 2001 letter provided by the permittee.

II. Operational Restrictions

1. The permittee shall employ a dry exhaust gas filtration system while the emissions unit is in operation.

II. Operational Restrictions (continued)

2. The maximum monthly coatings usage for this emissions unit shall not exceed 564 gallons and the maximum monthly cleanup materials usage for this emissions unit shall not exceed 7.5 gallons.

3. The maximum annual coatings usage for this emissions unit shall not exceed 6766 gallons and the maximum annual cleanup materials usage for this emissions unit shall not exceed 90 gallons.

4. When coating only non-metal parts, the permittee shall not employ any photochemically reactive material (coating or cleanup material) in this emissions unit that is a photochemically reactive material. "Photochemically reactive material" is defined in OAC rule 3745-21-01(C)(5).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for this emissions unit:

a. The company identification for each coating and cleanup material employed.

b. Documentation on whether or not each coating and cleanup material is a photochemically reactive material (when coating only non-metal parts).

c. The number of gallons of each coating and cleanup material employed.

d. The total number of gallons of all the coatings and of all the cleanup materials employed [summation of c for all coatings and summation of c for all cleanup materials].

e. The VOC content of each coating (in pounds/gallon and in pounds/gallon, excluding water and exempt solvents) and of each cleanup material, in pounds per gallon.

f. The total VOC emission rate for all the coatings and cleanup materials employed [summation of (c x e) for all coatings + summation of (c x e) for all cleanup materials], in pounds.

g. The total number of days the emissions unit was in operation.

h. The average daily VOC emission rate for all the coatings and cleanup materials, i.e., (f)/(g), in pounds per day (average).

2. The permittee shall maintain a log of all the time periods during which the dry exhaust gas filtration system was not functioning.

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing that the dry exhaust gas filtration system was not in service when the emissions unit was in operation. 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 30 days after the event occurs.

2. The permittee shall submit annual reports that summarize the total VOC emissions, the total coatings usage (gallons) and the total cleanup materials usage (gallons) for this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

3. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any monthly record showing the use of noncomplying coatings (i.e., for VOC content). 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 30 days following the end of the calendar month.

4. For the coating of only non-metal parts, the permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the use of any photochemically reactive material (coating and/or cleanup material) in this emissions unit. 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 30 days following the end of the calendar month.

IV. Reporting Requirements (continued)

5. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. An identification of each month during which the average daily VOC emissions from the coatings and cleanup materials exceeded 338 pounds per day, and the actual average daily VOC emissions for each such month.

b. An identification of each month during which the VOC emissions from the coatings and cleanup materials exceeded 1689 pounds per month, and the actual VOC emissions for each such month.

c. An identification of each month during which the monthly coatings usage restriction exceeded 564 gallons, and the actual coatings usage rate for each such month.

d. An identification of each month during which the monthly cleanup materials usage restriction exceeded 7.5 gallons, and the actual cleanup materials usage rate for each such month.

The quarterly deviation (excursion) reports shall be submitted in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation-
2.9 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method-
The permittee shall demonstrate compliance with the VOC content limitation above based upon the record keeping requirements in Section A.III.1 of this permit.

USEPA Method 24 analysis of the ingredients shall be used to determine the VOC contents of all the coatings and cleanup materials. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating or cleanup material, the permittee shall notify the Administrator of the USEPA and shall use the formulation data for that coating or cleanup material to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

1.b Emission Limitation-
338 lbs/day VOCs, including cleanup

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

1.c Emission Limitation-
1689 lbs/month VOCs, including cleanup

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

1.d Emission Limitation-
10.1 tons/yr VOCs, including cleanup

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. and shall be the sum of the 12 monthly VOC emission rates for the calendar year, divided by 2000.

V. Testing Requirements (continued)

1.e Usage Restrictions-
564 gallons/month - coatings usage
7.5 gallons/month - cleanup materials usage

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit.

1.f Usage Restrictions-
6766 gallons/year - coatings usage
90 gallons/year - cleanup materials usage

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in Section A.III.1. of this permit and shall be the summation of the 12 monthly usage rates for the calendar year.

1.g Emission Limitation-
0.551 lb/hr PE

Applicable Compliance Method-
To determine the actual worst case emission rate for particulates, the following equation shall be used:

E = maximum coating solids usage rate (in pounds per hour) x (1-TE) x (1-CE)

where,

E = particulate emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used

CE = control efficiency of the control equipment

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to OAC 3745-17-03(B)(10).

1.h Emission Limitation-
20% 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).

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Starch Handling (P002)

Activity Description: Bulk starch unloading from trucks or rail cars to silo and transfer to slurry tank.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
pneumatic unloading of corn starch to storage silo including bin vent fabric filter; pneumatic transfer from silo to slurry tank, including fabric filter	OAC rule 3745-17-11	5.47 lbs/hr particulate emissions (PE)
	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

2.a The limitation of 5.47 pounds of PE hour refers to the filterable portion of PE, as measured by USEPA Reference Test Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the fabric filter serving this emissions unit. The presence or absence of any visible emissions shall be recorded. If visible emissions are observed, the permittee shall also record the following:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

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

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation-
5.47 lbs/hr PE

Applicable Compliance Method-
Compliance may be determined by multiplying the maximum hourly corn starch unloading rate (tons/hr) by the emission factor of 1.3 lbs PE per ton [from the Reasonably Available Control Measures (RACM) Manual, Table 2.5-1 for railcar unloading] and by a control factor of (1 - 0.95*).

If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to OAC 3745-17-03(B)(10).

* Control efficiency of the baghouse is assumed to be 95%

1.b Emission Limitation-
20% opacity limitation, 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).

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Bottom Ash Silo #2 (P003)

Activity Description: Bottom Ash silo collects bottom ash from boiler #2

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
bottom ash silo for bottom ash from boiler #2, with air washer cyclone and baghouse	OAC rule 3745-17-11	7.58 lbs/hr particulate emissions (PE)
	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

2.a The limitation of 7.58 pounds of PE hour refers to the filterable portion of PE, as measured by USEPA Reference Test Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible emissions shall be recorded. If visible emissions are observed, the permittee shall also record the following:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

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

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation-
7.58 lbs/hr PE

Applicable Compliance Method-
If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to OAC 3745-17-03(B)(10).

1.b Emission Limitation-
Opacity shall not exceed 20%, 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).

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Bottom Ash Silo #4 (P004)

Activity Description: Bottom Ash silo collects bottom ash from boiler #4

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
bottom ash silo for bottom ash from boiler #4, with air washer cyclone and baghouse	OAC rule 3745-17-11	7.58 lbs/hr particulate emissions (PE)
	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

2.a The limitation of 7.58 pounds of PE hour refers to the filterable portion of PE, as measured by USEPA Reference Test Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse serving this emissions unit. The presence or absence of any visible emissions shall be recorded. If visible emissions are observed, the permittee shall also record the following:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

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

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation-
7.58 lbs/hr PE

Applicable Compliance Method-
If required, the permittee shall demonstrate compliance with the hourly allowable PE limitation above pursuant to OAC 3745-17-03(B)(10).

1.b Emission Limitation-
Opacity shall not exceed 20%, 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).

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: C-Stage Bleaching (P008)

Activity Description: C-Stage bleaching

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
chlorination stage bleaching process, with packed tower scrubber system	40 CFR, Part 63 Subpart S (National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry)	See A.I.2.

2. Additional Terms and Conditions

2.a The permittee shall achieve compliance with the requirements of 40 CFR Part 63, Subpart S by no later than April 16, 2001 as follows:

i. The permittee shall operate the equipment at each bleaching stage of the bleaching system where chlorinated compounds are introduced, such that it is enclosed and vented into a closed-vent system and routed to a control device that meets one of the following requirements:

(a) reduce the total chlorinated hazardous air pollutant (HAP), excluding chloroform, mass in the vent stream entering the control device by 99 percent or more by weight;

(b) achieve a treatment device outlet concentration of 10 parts per million or less by volume of total chlorinated HAP, excluding chloroform; or

(c) achieve a treatment device outlet mass emission rate of 0.001 kg of total chlorinated HAP, excluding chloroform, mass per megagram (0.002 pound per ton) of oven-dried pulp.

II. Operational Restrictions

1. By April 16, 2001, each enclosure and closed-vent system used for capturing and transporting vent streams that contain chlorinated HAP, excluding chloroform, emissions shall meet the following requirements:

a. each enclosure shall maintain negative pressure at each enclosure or hood opening as demonstrated by the procedures specified in 63.457 (e) of 40 CFR Part 63, Subpart S (each enclosure or hood opening closed during the initial performance test, shall be maintained in the same closed and sealed position as it was during the performance test at all times, except when it is necessary to use the opening for sampling, inspection, maintenance or repairs);

b. each component of the closed-vent system that is operated at positive pressure and located prior to a control device shall be designed for and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million by volume above background, as measured by the procedures specified in 40 CFR Part 63.457 (d); and

c. each bypass line in the closed-vent system that could divert vent streams containing chlorinated HAPs, excluding chloroform, to the atmosphere without meeting the specified emission limitations shall comply with either of the following requirements:

i. on each bypass line, the permittee shall install, calibrate, maintain, and operate according to manufacturer's specifications a flow indicator that provides a record of the presence of gas stream flow in the bypass line at least once every 15 minutes (the flow indicator shall be installed in the bypass line in such a way as to indicate flow in the bypass line); or

ii. for bypass line valves that are not computer controlled, the permittee shall maintain the bypass line valve in the closed position with a car seal or seal placed on the valve or closure mechanism in such a way that the valve or closure mechanism cannot be opened without breaking the seal.

III. Monitoring and/or Record Keeping Requirements

1. By April 16, 2001, the permittee shall install, calibrate, certify, operate and maintain according to the manufacturer's specifications, a continuous monitoring system (CMS), as defined in 40 CFR Part 63.2. The CMS shall be operated to measure the following parameters for each gas scrubber used to ensure compliance for the bleaching system:

a. The pH or the oxidation/reduction potential of the gas scrubber effluent.

b. The gas scrubber vent gas inlet flow rate, in scfm.

c. The gas scrubber liquid influent flow rate, in gallons.

In lieu of monitoring the above gas scrubber parameters, the permittee has the option of operating the CMS to measure the chlorine outlet concentration of each gas scrubber used to comply with the bleaching system allowable concentration of 10 parts per million or less by volume of total chlorinated HAP, excluding chloroform.

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

2. By April 16, 2001, the permittee shall comply with the following monitoring requirements:

a. for each enclosure opening, a visual inspection of the closure mechanism specified in 40 CFR Part 63.450 (b) shall be performed at least once every 30 days to ensure the opening is maintained in the closed position and sealed;

b. each closed-vent system shall be visually inspected every 30 days and at other times as requested by the Administrator (the visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects);

c. for positive pressure closed-vent systems or portions of closed-vent systems, demonstrate no detectable leaks as specified in 40 CFR Part 63.450 (c) measured initially and annually by the procedures in 40 CFR Part 63.457 (d);

d. demonstrate initially and annually that each enclosure opening is maintained at negative pressure as specified in 40 CFR Part 63.457 (e);

e. the valve or closure mechanism specified in 40 CFR Part 63.450 (d)(2) shall be inspected at least once every 30 days to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line; and

f. if an inspection identifies visible defects in ductwork, piping, enclosures or connections to covers, or if an instrument reading of 500 parts per million by volume or greater above background is measured, or if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable:

i. a first effort to repair or correct the closed-vent system shall be made as soon as practicable but no later than 5 calendar days after the problem is identified; and

ii. the repair or corrective action shall be completed no later than 15 calendar days after the problem is identified.

3. By April 16, 2001, the permittee shall prepare and maintain a site-specific inspection plan, including a drawing or schematic of the components of applicable affected equipment.

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

4. By April 16, 2001, the permittee shall collect and maintain the following information for each inspection:

a. Date of inspection.

b. The equipment type and identification.

c. Results of negative pressure tests for enclosures.

d. Results of leak detection tests.

e. The nature of the defect or leak and the method of detection (i.e., visual inspection or instrument detection)

f. The date the defect or leak was detected and the date of each attempt to repair the defect or leak.

g. Repair methods applied in each attempt to repair the defect or leak.

h. The reason for the delay if the defect or leak is not repaired within 15 days after discovery.

i. The expected date of successful repair of the defect or leak if the repair is not completed within 15 days.

j. The date of successful repair of the defect or leak.

k. The position and duration of opening of bypass line valves and the condition of any valve seals.

l. The duration of the use of bypass valves on computer controlled valves.

5. By April 16, 2001, the permittee shall record the CMS parameters and meet the requirements specified in 40 CFR 63.454 (a) for any new affected process equipment or pulping process condensate stream that becomes subject to the requirements of 40 CFR Part 63, Subpart S due to a change or modification.

6. By April 16, 2001, the permittee shall operate the control device in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored under section III.1and 2 of this permit. The operation of the control device below the minimum operating parameter values or above the maximum operating parameter values established or failure to perform procedures required by 40 CFR Part 63, Subpart S, shall constitute a violation of the applicable emission standard and shall be reported as a period of excess emissions.

IV. Reporting Requirements

1. The permittee shall submit a report summarizing the results of the required performance test as specified in section A.V to the Director (appropriate Ohio EPA District Office or local air agency) before the close of business on the 60th day following the completion of the performance test, unless specified otherwise or as approved otherwise in writing by the Director.

2. The permittee shall submit excess emissions and continuous monitoring system performance reports and/or summary reports to the Director semiannually, as specified in IV.3. and IV.4., except when:

a. the Director determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the emissions unit; or

b. the CMS data are to be used directly for compliance determination and the emissions unit experienced excess emissions, in which case quarterly reports shall be submitted.

Once the permittee reports excess emissions, the permittee shall follow a quarterly reporting format until a request to reduce reporting frequency under 40 CFR 63.10 is approved by the Director.

IV. Reporting Requirements (continued)

3. In accordance with 40 CFR Part 63, Subpart S, the permittee shall achieve compliance with this standard by April 16, 2001. Therefore, the first excess emissions and monitoring system performance report and summary report shall be due by July 30, 2001, and shall cover the period of April 16, 2001 through June 30, 2001. Subsequent excess emissions and monitoring system performance reports and all summary reports, if required, shall be due on January 30 and July 30 and shall cover the previous six calendar months.

Written reports of excess emissions or exceedances of process or control system parameters shall include all the following information and shall contain the name, title, and signature of the responsible official who is certifying the accuracy of the report:

a. the date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;

b. the date and time identifying each period during which the CMS was out of control, as defined in 40 CFR 63.8(c)(7);

c. the specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in the relevant standard(s), that occurs during startups, shutdowns, and malfunctions of this emissions unit;

d. the specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the relevant standard(s), that occurs during periods other than startups, shut-downs, and malfunctions of this emissions unit;

e. the nature and cause of any malfunction (if known);

f. the corrective action taken or preventive measures adopted;

g. the nature of the repairs or adjustments to the CMS that was inoperative or out of control; and

h. the total process operating time during the reporting period.

When no excess emissions or exceedances of a parameter have occurred, or a CMS has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report.

IV. Reporting Requirements (continued)

4. The summary reports shall contain the following information:

a. the company name and address;

b. an identification of each hazardous air pollutant monitored at this emissions unit;

c. the beginning and ending dates of the reporting period;

d. a brief description of the process units;

e. the emission and operating parameter limitations specified in this permit ;

f. the monitoring equipment manufacturer(s) and model number(s);

g. the date of the latest CMS certification or audit;

h. the total operating time of the affected source during the reporting period;

i. an emission data summary (or similar summary if the permittee monitors control system parameters), including the total duration of excess emissions during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to startup/shutdown, control equipment problems, process problems, other known causes, and other unknown causes;

j. a CMS performance summary (or similar summary if the permittee monitors control system parameters), including the total CMS down-time during the reporting period (recorded in minutes for opacity and hours for gases), the total duration of CMS downtime expressed as a percent of the total source operating time during that reporting period, and a break-down of the total CMS downtime during the reporting period into periods that are due to monitoring equipment malfunctions, non-monitoring equipment malfunctions, quality assurance/quality control calibrations, other known causes, and other unknown causes;

k. a description of any changes in CMS, processes, or controls since the last reporting period;

l. the name, title, and signature of the responsible official who is certifying the accuracy of the report; and

m. the date of the report.

V. Testing Requirements

1. By April 16, 2001, the permittee shall conduct an initial performance test, choose vent sampling port locations and gas stream properties, measure detectable leaks, demonstrate negative pressure, measure chlorinated HAP, excluding chloroform, concentrations, and calculate the vent gas stream in accordance with the methods and procedures outlined in 40 CFR Part 63.457.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
chlorination stage bleaching process with packed tower scrubber system	none	See B.I.2.a.

2. Additional Terms and Conditions

2.a The permittee shall perform inspections and maintenance on the packed tower scrubber system controlling the emissions from the chlorination stage bleaching process in accordance with the plan submitted on January 13, 1998 or as amended by the company.

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: Fly Ash Silo (P009)

Activity Description: Fly ash silo collects ash from both coal fired boilers.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
fly ash silo with fabric filters	OAC rule 3745-31-05 (A)(3) PTI No. 08-2358	2.0 lbs/hr particulate emissions (PE); 3.7 TPY PE See A.I.2.a.
	OAC rule 3745-17-07(A)	The visible emission requirement specified by this rule is less stringent than the visible emission requirement established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-17-11 (A)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).
fly ash unloading via paddle mill to trucks	OAC rule 3745-31-05 (A)(3) PTI No. 08-2358	The requirements established pursuant to this rule are equivalent to the requirements of OAC rules 3745-17-07 (B) and 3745-17-08 (B).
	OAC rule 3745-17-08 (B)	during unloading, reasonably available control measures (RACM) shall be implemented to minimize or eliminate the emissions of fugitive dust to the greatest extent possible.
	OAC rule 3745-17-07 (B)	Visible emissions of fugitive dust shall not exceed 20 percent opacity, as a 3-minute average.

2. Additional Terms and Conditions

2.a The fabric filter shall achieve an outlet emission rate of not greater than 0.030 grain PE per dry standard cubic foot of exhaust gases or there shall be no visible emissions from the exhaust stack, whichever is less stringent.

2.b The PE limitations of 2.0 lbs per hour and 0.030 grain per dscf refer to the filterable portion of PE, as measured by USEPA Reference Test Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

II. Operational Restrictions

1. The maximum annual operating hours for this emissions unit shall not exceed 3700 hours.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the fabric filter serving this emissions unit. The presence or absence of any visible emissions shall be recorded. If visible emissions are observed, the permittee shall also record the following:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

2. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible fugitive dust emissions from the fly ash unloading operation. The presence or absence of any visible emissions shall be recorded. If visible emissions are observed, the permittee shall also record the following:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

3. The permittee shall record and maintain each month the number of hours the emissions unit was in operation.

IV. Reporting Requirements

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

2. The permittee shall submit semi-annual written reports that (a) identify all days during which any any visible fugitive dust emissions were observed from the fly ash unloading operation and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (District Office or local air agency) and shall cover the previous 6-month period.

3. The permittee shall submit annual reports that summarize the total number of hours the emissions unit was in operation. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitations-
0.030 grain/dscf PE (from baghouse)
2.0 lbs PE/hr (from baghouse)
3.7 tons PE/year (from baghouse)

Applicable Compliance Method-
Compliance with the hourly allowable PE limitation above may be determined by multiplying the uncontrolled emission factor of 20 lbs PE/ton of fly ash produced* by the maximum hourly fly ash production rate (tons/hr), and then by a control factor of 0.02.**

Compliance with the annual allowable PE limitation shall be assumed as long as compliance with the hourly allowable PE limitation and with the restriction on the annual number of hours of operation are maintained (the annual PE limitation was calculated by multiplying the hourly PE limitation by 3700, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the hourly and grain/dscf allowable PE limitations above pursuant to OAC 3745-17-03(B)(10).

* This emission factor is obtained from the RACM document, page 2-175, Table 2.41.

** This is based on an assumed baghouse control efficiency of 98%.

1.b Emission Limitation-
Opacity shall not exceed 20 percent, as a 3-minute average (from silo unloading)

Applicable Compliance Method-
If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(3).

1.c Emission Limitation-
no visible emissions (from baghouse)

Applicable Compliance Method-
Compliance shall be determined by visible emission evaluations performed in accordance with Method 22 of 40 CFR, Part 60, Appendix A.

1.d Hours Restriction-
3700 hours/year

Applicable Compliance Method-
Compliance with the annual restriction above shall be demonstrated based upon the record keeping required in Section A.III.2 and shall be the summation of the 12 monthly number of hours of operation for the calendar year.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
fly ash silo with fabric filters and unloading via paddle mill to trucks	none	none

2. Additional Terms and Conditions

2.a The permittee shall continue to implement the Inspection and Maintenance (I&M) Plan submitted on April 20, 1993 or as amended for this emissions unit and the associated emissions control system.

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: No. 92 Papermachine - Coater (P011)

Activity Description: No. 92 Papermachine coater and air floatation dryer.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
no. 92 papermachine coater and air floatation dryer	OAC rule 3745-31-05 (A)(3) PTI No. 08-2680	1.0 lb VOC/gallon of coating, excluding water and exempt solvents 2.0 lbs/hr and 3.0 TPY VOC 0.125 pound NOx per mmBtu of actual heat input; 3.50 TPY NOx 0.15 pound CO per mmBtu of actual heat input; 4.20 TPY CO
	OAC rule 3745-21-09(F)	The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC 3745-31-05 (A)(3).

2. Additional Terms and Conditions

2.a The 2.0 lbs/hr VOC limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:

a. The name and identification number of each coating employed, as applied.

b. The VOC content of each coating formulation, in pounds/gallon (excluding water and exempt solvents), as applied, and each subsequent reformulation based on the USEPA Method 24 analyses of the ingredients.

c. The total amount of paper produced, in tons.

d. The total VOC emissions, calculated by multiplying the amount of paper produced, from Section 1.c above, by the maximum VOC emission factor of 0.2 lb/ton of paper produced, in pounds.

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 showing the use of noncomplying coatings (i.e., for VOC content). 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 30 days following the end of the calendar month.

2. The permittee shall submit annual reports that summarize the actual annual VOC emissions for this emissions unit. The reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation-
2.0 lbs/hr VOC

Applicable Compliance Method-
Compliance shall be determined by multiplying the maximum hourly paper production (10 tons/hour) by the maximum VOC emission factor of 0.2 lb/ton.

1.b Emission Limitation-
1.0 lb VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method-
Compliance with the VOC content limitation above shall be demonstrated based upon the record keeping required in Section A.III.1 of this permit.

USEPA Method 24 analysis of the ingredients shall be used to determine the VOC contents of all the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use the formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

1.c Emission Limitation-
4.20 TPY CO

Applicable Compliance Method-
Provided compliance is shown with the lb CO/mmBtu limitation, compliance with the annual limitation shall also be shown [the annual limitation was calculated by multiplying the maximum hourly heat input capacity of the dryer (6.4 mmBtu/hr) by the emission limitation of 0.15 lb CO/mmBtu and by 8760, and then dividing by 2000].

1.d Emission Limitation-
3.50 TPY NOx

Applicable Compliance Method-
Provided compliance is shown with the lb NOx/mmBtu limitation, compliance with the annual limitation shall also be shown [the annual limitation was calculated by multiplying the maximum hourly heat input capacity of the dryer (6.4 mmBtu/hr) by the emission limitation of 0.125 lb NOx/mmBtu and by 8760, and then dividing by 2000].

1.e Emission Limitation-
3.0 TPY VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping required in Section A.III.1 and shall be the summation of the 12 monthly VOC emission rates for the calendar year, divided by 2000.

V. Testing Requirements (continued)

1.f Emission Limitations-
0.125 lb NOx per mmBtu of actual heat input
0.15 lb CO per mmBtu of actual heat input

Applicable Compliance Method-
If required, compliance with the emission limitations above shall be based upon the following:

i. for CO : Methods 1 through 4 and 10, 40 CFR, Part 60, Appendix A; and
ii. for NOx: Methods 1 through 4 and 7, 40 CFR, Part 60, Appendix A.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: No. 91 Papermachine - Coater (P013)

Activity Description: No. 91 Papermachine coater

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
no. 91 papermachine coater and steam dryer oven	OAC rule 3745-31-05 (A)(3) PTI No. 08-3433	1.25 lbs VOC/gallon of coating, excluding water and exempt solvents 7.66 lbs/hr and 15.5 TPY VOC
	OAC rule 3745-21-09(F)	The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

2.a The 7.66 lbs/hr VOC limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:

a. The name and identification number of each coating, as applied.

b. The number of gallons of each coating employed, excluding water and exempt solvents.

c. The VOC content of each coating formulation, in pounds/gallon (excluding water and exempt solvents), as applied, and each subsequent reformulation based on the USEPA Method 24 analyses of the ingredients.

d. The total VOC emission rate for all the coatings employed [summation of (b x c) for all coatings], in pounds.

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 showing the use of noncomplying coatings (i.e., for VOC content). 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 30 days following the end of the calendar month.

2. The permittee shall submit annual reports for this emissions unit that specify the total VOC emissions for the previous calendar year. These reports shall be in writing and submitted to the Director (appropriate District Office or local air agency) by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation-
1.25 lbs VOC/gallon of coating, excluding water and exempt solvents

Applicable Compliance Method-
The permittee shall demonstrate compliance based upon the record keeping required in Section A.III.1 of this permit.

USEPA Method 24 analysis of the ingredients shall be used to determine the VOC contents of all the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use the formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

1.b Emission Limitation-
7.66 lbs/hr VOC

Applicable Compliance Method-
Compliance shall be demonstrated by multiplying the maximum hourly coatings usage (gallons/hr) by the maximum VOC content of all the coatings (lbs VOC/gallon of coating).

1.c Emission Limitation-
15.5 TPY VOC

Applicable Compliance Method-
Compliance shall be based upon the record keeping required in Section A.III.1. of this permit and shall be the summation of the 12 monthly VOC emission rates for the calendar year, divided by 2000.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: No. 93 Papermachine - Coater (P014)

Activity Description: No. 93 Papermachine coater and air floatation dryer.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
no. 93 papermachine coater with natural gas air floatation dryer and infrared dryer	OAC rule 3745-31-05 (A)(3) PTI No. 08-3640	0.5 lb VOC/gallon of coating, excluding water and exempt solvents 104.2 lbs/day and 19.03 TPY VOC 0.166 pound NOx per mmBtu actual heat input; 5.74 TPY NOx; 0.21 pound CO per mmBtu actual heat input; 7.05 TPY CO
	OAC rule 3745-21-09 (F)	The VOC content limitation specified by this rule is less stringent than the VOC content limitation established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

2.a The 104.2 lbs/day VOC limit was established for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month for the line:

a. The name and identification number of each coating, as applied.

b. The number of gallons of each coating employed.

c. The VOC content of each coating formulation, in pounds/gallon (excluding water and exempt solvents), as applied, and each subsequent reformulation based on the USEPA Method 24 analyses of the ingredients.

d. The total VOC emission rate for all the coatings employed [summation of (b x c) for all coatings], in pounds.

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 showing the use of noncomplying coatings (i.e., for VOC content). 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 30 days following the end of the calendar month.

2. The permittee shall submit annual reports for this emissions unit that specify the total VOC emissions for the previous calendar year. These reports shall be in writing and submitted to the Director (appropriate District Office or local air agency) by January 31 of each year.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation-
0.5 lb VOC/gallon coating, excluding water and exempt solvents

Applicable Compliance Method-
The permittee shall demonstrate compliance based upon the record keeping required in Section A.III.1 of this permit.

USEPA Method 24 analysis of the ingredients shall be used to determine the VOC contents of all the coatings. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, the permittee determines that Method 24 cannot be used for a particular coating, the permittee shall notify the Administrator of the USEPA and shall use the formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

1.b Emission Limitation-
104.2 lbs/day VOC

Applicable Compliance Method-
Compliance with the daily allowable VOC emission limitation above shall be demonstrated by multiplying the maximum coatings usage rate (gallons/day) by the maximum VOC content of all the coatings (pounds/gallon).

1.c Emission Limitation-
19.03 TPY VOC

Applicable Compliance Method-
Compliance shall be based upon the recordn keeping required in Section A.III.1 and shall be the summation of the 12 monthly VOC emission rates for the calendar year, divided by 2000.

V. Testing Requirements (continued)

1.d Emission Limitations-
0.166 lb NOx per mmBtu actual heat input
0.21 lb CO per mmBtu actual heat input

Applicable Compliance Method-
If required, compliance with the emission limitations above shall be based upon the following:

i. for CO : Methods 1 through 4 and 10, 40 CFR, Part 60, Appendix A; and
ii. for NOx: Methods 1 through 4 and 7, 40 CFR, Part 60, Appendix A.

1.e Emission Limitation-
7.05 TPY carbon monoxide

Applicable Compliance Method-
Provided compliance is shown with the lb CO/mmBtu emission limitation, compliance with the annual limitation shall also be shown. Compliance with the annual limitation was calculated as follows:

i. multiply the maximum hourly heat input capacity of the natural gas air floatation dryer (4.4 mmBtu/hr) by the emission limitation of 0.21 lb CO/mmBtu;

ii. multiply the maximum hourly heat input capacity of the infrared dryer (4.97 mmBtu/hr) by the emission factor of 0.057 lb CO/mmBtu;*

iii. sum i and ii; and

iv. multiply iii by 8760, and then divide by 2000.

* This is based on information provided by the manufacturer.

1.f Emission Limitation-
5.74 TPY nitrogen oxides

Applicable Compliance Method-
Provided compliance is shown with the lb NOx/mmBtu emission limitation, compliance with the annual limitation shall also be shown. Compliance with the annual limitation was calculated as follows:

i. multiply the maximum hourly heat input capacity of the natural gas air floatation dryer (4.4 mmBtu/hr) by the emission limitation of 0.166 lb NOx/mmBtu;

ii. multiply the maximum hourly heat input capacity of the infrared dryer (4.97 mmBtu/hr) by the emission factor of 0.041 lb NOx/mmBtu;*

iii. sum i and ii; and

iv. multiply iii by 8760, and then divide by 2000.

* This is based on information provided by the manufacturer.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: No. 92 Papermachine - Wet End (P016)

Activity Description: No. 92 Papermachine - wet end

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
no. 92 papermachine - wet end	OAC rule 3745-21-07 (G)(2)	8.0 lbs/hr, 40.0 lbs/day organic compounds (OC), including photochemically reactive cleanup materials, unless the OC emissions are reduced by 85%, by weight See A.2.a.

2. Additional Terms and Conditions

2.a The limitations above include emissions of OC from all of the OC materials employed, excluding the materials documented in the September 5, 2001 letter provided by the permittee.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each day for the operation:

a. The company identification for each additive material and cleanup material employed and documentation as to whether or not each is a photochemically reactive material..

b. The number of gallons of each additive material and photochemically reactive cleanup material employed.

c. The organic compound content of each additive material and photochemically reactive cleanup material, in pounds per gallon.

d. For each day during which a photochemically reactive material (additive or cleanup material) is employed, the total organic compound emission rate for all the additives and photochemically reactive cleanup materials, in pounds.

e. For each day during which a photochemically reactive material (additive or cleanup material) is employed, the total number of hours the emissions unit was in operation.

f. For each day during which a photochemically reactive material (additive or cleanup material) is employed, the average hourly organic compound emission rate for all the additives and photochemically reactive cleanup materials, i.e., (d)/(e), in pounds per hour (average).

[Note: The coating information must be for the additives as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. For the days during which a photochemically reactive material (coating and/or cleanup material) was employed, an identification of each day during which the average hourly organic compound emissions from all the additives and photochemically reactive cleanup materials exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day .

b. For the days during which a photochemically reactive material (coating and/or cleanup material) was employed, an identification of each day during which the organic compound emissions from all the additives and photochemically reactive cleanup materials exceeded 40 pounds per day, and the actual organic compound emissions for each such day.

The quarterly deviation (excursion) reports shall be submitted in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emission limitations in section A.I. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation-
8.0 lbs/hr OC, including photochemically reactive cleanup materials

Applicable Compliance Method-
Compliance shall be based upon the record keeping required in Section A.III.1. of this permit.

1.b Emission Limitation-
40.0 lbs/day OC, including photochemically reactive cleanup materials

Applicable Compliance Method-
Compliance shall be based upon record keeping required in Section A.III.1. of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the OC contents of all the materials employed.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: E-Stage Bleaching (P017)

Activity Description: E-Stage bleaching

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Extraction Stage Bleaching	OAC rule 3745-21-07 (G)(2)	8 lbs/hr organic compound (OC), 40 lbs/day OC (See A.I.2.a.)

2. Additional Terms and Conditions

2.a The limitations above include emissions of OC from all of the OC materials employed, excluding the materials documented in the September 5, 2001 letter provided by the permittee.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this operation:

a. The company identification for each material employed and documentation as to whether or not each material is a photochemically reactive material.

b. The number of gallons of each material employed.

c. The organic compound content of each material employed, in pounds per gallon.

d. For each day during which a photochemically reactive material is employed, the total organic compound emission rate for all the materials employed, in pounds.

e. For each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation.

f. For each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all the materials employed, i.e., (d)/(e), in pounds per hour (average).

[Note: The organic compound material information must be for the material as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive" is found in OAC rule 3745-21-01(C)(5).]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day .

b. For the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions exceeded 40 pounds, and the actual organic compound emissions for each such day.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation-
8 lbs/hr OC

Applicable Compliance Method-
Compliance with the hourly allowable OC emisison limiation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

1.b Emission Limitation-
40 lbs/day OC

Applicable Compliance Method-
Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the materials employed in this emissions unit.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: H-Stage Bleaching (P018)

Activity Description: H-Stage bleaching

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Hypochlorite Stage Bleaching	OAC rule 3745-21-07 (G)(2)	8 lbs/hr organic compound (OC), 40 lbs/day OC (See A.I.2.a.)

2. Additional Terms and Conditions

2.a The limitations above include emissions of OC from all of the OC materials employed, excluding the materials documented in the September 5, 2001 letter provided by the permittee.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this operation:

a. The company identification for each material employed and documentation as to whether or not each material is a photochemically reactive material.

b. The number of gallons of each material employed.

c. The organic compound content of each material employed, in pounds per gallon.

d. For each day during which a photochemically reactive material is employed, the total organic compound emission rate for all the materials employed, in pounds.

e. For each day during which a photochemically reactive material is employed, the total number of hours the emissions unit was in operation.

f. For each day during which a photochemically reactive material is employed, the average hourly organic compound emission rate for all the materials employed, i.e., (d)/(e), in pounds per hour (average).

[Note: The organic compound material information must be for the material as employed, including any thinning solvents added at the emissions unit. Also, the definition of "photochemically reactive" is found in OAC rule 3745-21-01(C)(5).]

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that include the following information:

a. For the days during which a photochemically reactive material was employed, an identification of each day during which the average hourly organic compound emissions exceeded 8 pounds per hour, and the actual average hourly organic compound emissions for each such day .

b. For the days during which a photochemically reactive material was employed, an identification of each day during which the organic compound emissions exceeded 40 pounds, and the actual organic compound emissions for each such day.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation-
8 lbs/hr OC

Applicable Compliance Method-
Compliance with the hourly allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

1.b Emission Limitation-
40 lbs/day OC

Applicable Compliance Method-
Compliance with the daily allowable OC emission limitation above shall be based upon the record keeping requirements specified in Section A.III.1 of this permit.

2. Formulation data or USEPA Method 24 shall be used to determine the organic compound contents of the materials employed in this emissions unit.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Ansilex Clay Handling (P019)

Activity Description: Bulk ansilex clay unloading from trucks or railcars to silo and transfer to either of two coating makedown tanks.

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
clay storage silo with two blowers, 3 bag filters (one with emissions to the ambient air, two discharging inside the building) with associated ductwork and controls	OAC rule 3745-31-05 (A)(3) PTI 08-04240	0.020 grain of particulate emissions (PE) per dry standard cubic foot of exhaust gases 0.14 lb/hr PE 0.61 TPY PE The visible emissions shall not exceed 5% opacity, as a 6 minute average.
	OAC 3745-17-07 (A)(1)	The visible emission restriction specified by this rule is less stringent than the visible emission restriction established pursuant to OAC rule 3745-31-05 (A)(3).
	OAC rule 3745-17-11(B)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05 (A)(3).

2. Additional Terms and Conditions

2.a The 0.14 lb/hr particulate emissions limitation was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limit.

2.b The PE limitations of 0.14 lb per hour and 0.020 grain per dscf refer to the filterable portion of PE, as measured by USEPA Reference Test Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

II. Operational Restrictions

1. The pressure drop across each baghouse shall be maintained within the range of 0.5 to 5.0 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across each baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across each baghouse on a once per 8-hour shift basis.

IV. Reporting Requirements

1. The permittee shall submit pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across any of the baghouses did not comply with the allowable range specified above. The deviation report shall be submitted in accordance with the General Terms and Conditions of this permit, Paragraph A.1.c.

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 grain of PE per dry standard cubic foot of exhaust gases

Applicable Compliance Method-
If required, compliance with the allowable PE limitation above shall be demonstrated pursuant to Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

1.b Emission Limitation-
0.14 lb/hr particulate emissions

Applicable Compliance Method-
The hourly allowable PE limitation above was developed as follows:

rail car or truck unloading of dry clay to silo (controlled with baghouse) =
(0.020 gr/dscf) x (820 scfm) x (60 min/hr) x (lb/7000 grains) = 0.14 lb/hr

Therefore, as long as compliance with the grain PE/dscf is maintained, compliance with the hourly PE limitation shall also be shown.

If required, compliance with the hourly allowable PE limitation above shall be demonstrated pursuant to Methods 1 through 5 of 40 CFR, Part 60, Appendix A.

1.c Emission Limitation-
0.61 TPY PE

Applicable Compliance Method-
As long as compliance with the hourly PE limitation is maintained, compliance with the annual PE limitation shall also be shown (the annual PE limitation was developed by multiplying the hourly PE limitation by 8760, and then dividing by 2000).

1.d Emission Limitation-
The visible emissions shall not exceed 5% 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).

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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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