



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

08/22/03

**CERTIFIED MAIL**

**RE: Preliminary Proposed Title V  
Chapter 3745-77 permit**

06-71-01-0028  
MW Custom Papers LLC - Chillicothe Mill  
Kathy A. Wiedeman  
401 South Paint St.  
P.O. Box 2500  
Chillicothe, OH 45601

Dear Kathy A. Wiedeman:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 06/11/03. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **In order to facilitate our review of all the comments or concerns you may have with the enclosed preliminary proposed permit, please provide a hand marked-up copy of the permit showing the changes you think are necessary, along with any additional summary comments, within fourteen (14) days from your receipt of this letter to:**

**Ohio EPA, Division of Air Pollution Control  
Jim Orlemann, Manager, Engineering Section  
Preliminary Proposed Title V Permit Correspondence  
122 South Front Street  
Columbus, Ohio 43215**

and

Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740) 385-8501

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Sincerely,

*Michael W. Ahern*  
Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: Southeast District Office  
File, DAPC PMU



State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Issue Date: 08/22/03

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: 06-71-01-0028 to:
MW Custom Papers LLC - Chillicothe Mill
401 South Paint St.
P.O. Box 2500
Chillicothe, OH 45601

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

Table with 3 columns: Emissions Unit ID (Company ID), Emissions Unit Activity Description, and Emissions Unit Activity Description. Rows include units like B001 (No.5 Coal Boiler), P015 (Chemiwasher Area), P510 (No.12 Paper Machine Additive/Starch System), etc.

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.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Southeast District Office  
2195 Front Street  
Logan, OH 43138  
(740) 385-8501

OHIO ENVIRONMENTAL PROTECTION AGENCY

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Christopher Jones  
Director

## PART I - GENERAL TERMS AND CONDITIONS

### A. *State and Federally Enforceable Section*

#### 1. **Monitoring and Related Record Keeping 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.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*
- 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.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*
- c. The permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.  
*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*
  - ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**
    - (a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (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. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii)

pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i), (ii) and (iii))*

- (b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))*

iii. **For monitoring, record keeping, and reporting requirements:**

Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, record keeping, 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.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))*

- 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

**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 of any emissions unit(s) 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 OAC rule 3745-15-06, 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).

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))*

**3. Risk Management Plans**

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. (“Act”); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

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

*(Authority for term: OAC rule 3745-77-07(A)(4))*

**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.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

**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.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

**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, in accordance with A.10 below. 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.

*(Authority for term: OAC rule 3745-77-07(A)(7))*

**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.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**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.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**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.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**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 (18) 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.  
*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**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.

*(Authority for term: OAC rule 3745-77-07(B))*

**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 Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA 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.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

### **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.

*(Authority for term: OAC rule 3745-77-07(F))*

### **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).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

**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.

*(Authority for term: OAC rule 3745-77-07(G))*

**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 of the U.S. EPA, 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.
- 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 purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

*(Authority for term: OAC rule 3745-77-07(I))*

**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.

*(This term is provided for informational purposes only.)*

**18. Insignificant Activities**

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

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**19. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. 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.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**B. *State Only Enforceable Section***

**1. Reporting Requirements Related to Monitoring and Record Keeping Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

**2. 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.

**3. 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.

**4. 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).

**5. 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.

**6. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

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

## Part II - Specific Facility Terms and Conditions

### A. State and Federally Enforcable Section

1. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.
2. The permittee shall comply with all applicable provisions specified in 40 CFR Part 82, Subparts B and F as related to the operations at this facility.
3. All asbestos renovation and demolition activities conducted at this facility shall be performed in accordance with the applicable requirements specified in 40 CFR Part 61 and OAC Chapter 3745-20.
4. Startup, Shutdown and Malfunction Plan

Within sixty days of the effective date of this permit, the permittee shall prepare a startup, shutdown and malfunction ("SSM") plan in accordance with the requirements of 40 CFR Part 63.6(e).

**4.a** At a minimum, the SSM plan must include:

- i. detailed procedures for operating and maintaining sources during periods of startup, shutdown and malfunction;
- ii. a program of corrective action for malfunctioning process equipment;
- iii. a program of corrective action for malfunctioning air pollution control equipment; and
- iv. identify all routine or otherwise predictable continuous monitoring system ("CMS") malfunctions.

**4.b** Records must be kept demonstrating that the permittee followed the procedures specified in the SSM plan for each startup, shutdown or malfunction. At a minimum, the following records shall be maintained:

- i. the occurrence and duration of each startup, shutdown or malfunction of process equipment;
- ii. the occurrence and duration of each malfunction of air pollution control equipment;
- iii. actions taken during a startup, shutdown or malfunction of process or air pollution control equipment that are different from the procedures specified in the SSM plan;
- iv. all information necessary to demonstrate conformance with the procedures specified in the SSM plan;
- v. each period during which a CMS is malfunctioning or inoperative, including out-of-control periods;
- vi. all required measurements needed to demonstrate compliance with a relevant standard (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements and raw performance evaluation measurements, that support the data that is required to be reported;
- vii. all results of performance tests, CMS performance evaluations, and, if required, opacity and visible emission observations;
- viii. all CMS calibration checks; and
- ix. all adjustments and maintenance performed on CMS.

The records shall be maintained for a minimum of five years following the date of each occurrence, measurement, maintenance, corrective action or report required by the SSM plan. At a minimum, the most recent two years of data shall be kept on site and the remaining three years can be kept off-site. These records can be kept on microfilm, computer, computer floppy disk, magnetic tape, or microfiche.

**A. State and Federally Enforcable Section (continued)**

- 4.c** If the SSM plan is revised, the previous version shall be kept for a period of at least five years after it has been revised and shall be made available for inspection upon request.

If the SSM plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction, the SSM plan must be revised within 45 days after the event. The revision shall include detailed procedures for operating and maintaining the source during future malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.

- 4.d** [40 CFR 63.10]  
Reporting requirements are as follows:

- i. If an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the SSM plan, these actions shall be reported to the appropriate District office or local air agency by phone or FAX within two working days after commencing the actions inconsistent with the plan.
- ii. A written report postmarked not later than seven working days after the end of the event must be sent to the appropriate District office or local air agency. The written report, at a minimum, shall contain the following:
  - (a) name, title, and signature of the responsible official certifying its accuracy;
  - (b) explanation of the event;
  - (c) the reasons for not following the SSM plan; and
  - (d) whether any excess emissions and/or parameter monitoring exceedences are believed to have occurred.

A semiannual report shall be submitted stating the actions taken during periods of startup, shutdown and malfunctions were consistent with the procedures specified in the SSM plan. The report shall be sent to the appropriate District office or local air agency by January 31 and July 31 of each year covering the previous six-month period.

**5. Condensate Collection & Treatment System**

The permittee shall comply with all applicable monitoring requirements in 40 CFR Part 63, Subpart A, as specified in 40 CFR Part 63, Subpart S, Table 1.

- 5.a** [40 CFR 63.446(b)]  
The pulping process condensates from the regulated equipment systems associated with the emissions units at this facility identified in 40 CFR 63.446(b), shall be treated to meet the requirements specified in 40 CFR 63.446(c), (d) and (e).

- 5.b** [40 CFR 63.446(c)]  
One of the following combinations of HAP-containing pulping process condensates generated, produced, or associated with the equipment listed in 40 CFR 63.446(b) at this facility shall be subject to the requirements of 40 CFR 63.446(d) and (e):
- i. all of the pulping process condensates from the equipment systems specified in 40 CFR 63.446(b)(1) through (b)(5);
  - ii. the combined pulping process condensates from the equipment systems specified in paragraphs 40 CFR 63.446(b)(4) and (b)(5), plus pulping process condensate streams that in total contain at least 65% of the total HAP mass from the pulping process condensates from equipment listed in 40 CFR 63.446(b)(1) through (b)(3); or
  - iii. the pulping process condensates from equipment systems listed in 40 CFR 63.446(b)(1) through (b)(5) that in total contain a total HAP mass of 11.1 pounds or more of total HAP per ton of oven-dried pulp.

**A. State and Federally Enforcable Section (continued)**

- 5.c** [40 CFR 63.446(d)]  
The pulping process condensates from the equipment systems listed in 40 CFR 63.446(b) shall be conveyed in a closed collection system that is designed and operated to meet the requirements specified in 40 CFR 63.446(d)(1) and (d)(2).
- 5.d** [40 CFR 63.446(e)]  
Each pulping process condensate from the equipment systems listed in 40 CFR 63.446(b) shall be treated according to one of the following options:
- i. recycle the pulping process condensate to an equipment system specified in 40 CFR 63.443(a) meeting the requirements specified in 40 CFR 63.443(c) or (d);
  - ii. discharge the condensate below the liquid surface of a biological treatment system meeting the requirement specified in 40 CFR 63.446(e)(3);
  - iii. treat the pulping process condensate to reduce or destroy the total HAP's by at least 92% or more by weight; or
  - iv. treat the pulping process condensates to remove 10.2 pounds or more of total HAP per ton of oven-dried pulp or achieve a total HAP concentration of 330 parts per million or less by weight at the outlet of the control device.
- 6.** Nitrogen Oxides (NOx) Budget Trading Program OAC Chapter 3745-14
- 6.a** Facility Code - 10244
- 6.b** The following regulated emissions units are subject to the applicable requirements specified in OAC Chapter 3745-14 and the annual NOx allowance allocations listed below:
- | Emissions Unit           | Annual Allowance for<br>Calendar Years<br>2004 through 2007 |
|--------------------------|-------------------------------------------------------------|
| B001 - No. 5 coal boiler | 182                                                         |
| B002 - No. 7 coal boiler | 205                                                         |
| B003 - No. 8 coal boiler | 248                                                         |
- 6.c** The emissions units identified in Section A.6.b above are NOx budget units under OAC rule 3745-14-01(C)(1)(b). [OAC rule 3745-14-01(C)(1)]
- 6.d** NOx allowances for units commencing operation on the dates specified in OAC rule 3745-14-05(C)(4) shall be allocated from the new source set-aside in accordance with the provisions of OAC rule 3745-14-05(C)(4)(d). [OAC rule 3745-14-05(C)(4)]
- 6.e** The NOx authorized account representative shall submit a complete NOx budget permit application in accordance with the deadlines specified in paragraphs (B)(2) and (B)(3) of OAC rule 3745-14-03. The NOx authorized account representative shall also submit, in a timely manner, any supplemental information that the Director determines is necessary in order to review a NOx budget permit application and issue or deny a NOx budget permit.  
[OAC rules 3745-14-01(E)(1)(a)(i), 3745-14-01(E)(1)(a)(ii), and 3745-14-03(B)(1)]
- 6.f** Beginning May 31, 2004, the owners and operators of each NOx budget source and each NOx budget unit at the source shall hold NOx allowances available for compliance deductions under paragraph (E) of OAC rule 3745-14-06, as of the NOx allowance transfer deadline, in the unit's compliance account and the source's overdraft account in an amount not less than the total NOx emissions for the control period from the unit, as determined in accordance with OAC rule 3745-14-08, plus any amount necessary to account for actual utilization under paragraph (C)(5) of OAC rule 3745-14-05 for the control period.  
[OAC rules 3745-14-01(E)(3)(a) and 3745-14-01(E)(3)(c)]

**A. State and Federally Enforcable Section (continued)**

- 6.g** NOx allowances shall be held in, deducted from, or transferred among NOx allowance tracking system accounts in accordance with OAC rules 3745-14-05, 3745-14-06, 3745-14-07, and 3745-14-09.  
[OAC rule 3745-14-01(E)(3)(d)]
- 6.h** A NOx allowance shall not be deducted, in order to comply with the requirement under paragraph (E)(3)(a) of OAC rule 3745-14-01, for a control period in a year prior to the year for which the NOx allowance was allocated.  
[OAC rule 3745-14-01(E)(3)(e)]
- 6.i** Each ton of NOx emitted in excess of the NOx budget emission limitation, as defined in OAC rule 3745-14-01(B)(2)(yy), shall constitute a separate violation of OAC Chapter 3745-14, the Clean Air Act, and applicable Ohio law. The owners and operators of a NOx budget unit that has excess emissions in any control period shall surrender the NOx allowances required for deduction under paragraph (E)(4)(a) of OAC rule 3745-14-06 and pay any fine, penalty, or assessment or comply with any other remedy imposed under paragraph (E)(4)(c) of OAC rule 3745-14-06.  
[OAC rules 3745-14-01(E)(3)(b), 3745-14-01(E)(4)(a) and 745-14-01(E)(4)(b)]
- 6.j** When recorded by the Administrator pursuant to OAC rules 3745-14-06 and 3745-14-07, every allocation, transfer, or deduction of a NOx allowance to or from a NOx budget unit's compliance account or the overdraft account of the source where the unit is located is deemed to amend automatically, and become a part of, any NOx budget permit of the NOx budget unit by operation of law without any further review.  
[OAC rule 3745-14-01(E)(3)(h)]
- 6.k** Except as provided below, the Director shall revise the NOx budget permit, as necessary, in accordance with OAC rule 3745-77-08. Each NOx budget permit is deemed to incorporate automatically the definitions of terms under paragraph (B) of OAC rule 3745-14-01 and, when recorded by the Administrator, in accordance with OAC rules 3745-14-06 and 3745-14-07, every allocation, transfer, or deduction of a NOx allowance to or from the compliance accounts of the NOx budget units covered by the permit or the overdraft account of the NOx budget source covered by the permit.  
[OAC rules 3745-14-03(D)(2) and 3745-14-03(E)(1)]
- 6.l** The owner or operator of a NOx budget unit shall comply with the prohibitions under OAC rule 3745-14-08(A)(5).  
[OAC rule 3745-14-08(A)(5)]
- 6.m** The owners and operators of the NOx budget unit shall keep on site at the source each of the following documents for a period of five years from the date the document is created: (This period may be extended for cause, at any time prior to the end of five years, in writing by the Director or Administrator.)
- i. the account certificate of representation for the NOx authorized account representative for the NOx budget unit and all documents that demonstrate the truth of the statements in the account certificate of representation, in accordance with paragraph (D) of OAC rule 3745-14-02, provided that the certificate and documents shall be retained on site at the source beyond such five-year period until such documents are superseded because of the submission of a new account certificate or representation changing the NOx authorized account representative;
  - ii. all emission monitoring information, in accordance with OAC rule 3745-14-08;
  - iii. copies of all reports, compliance certifications, and other submissions and all records made or required under the NOx budget trading program; and
  - iv. copies of all documents used to complete a NOx budget permit application and any other submission under the NOx budget trading program or to demonstrate compliance with the requirements of the NOx budget trading program.  
[OAC rule 3745-14-01(E)(5)(a)(i) through (iv)]

**A. State and Federally Enforcable Section (continued)**

- 6.n** The permittee, and to the extent applicable, the NOx authorized account representative of the NOx budget unit, shall comply with the monitoring and reporting requirements as provided in OAC rule 3745-14-08 and in 40 CFR Part 75, Subpart H. For purposes of complying with such requirements the definitions in OAC rule 3745-14-01(B) and in 40 CFR 72.2 shall apply, and the terms "affected unit," "designated representative," and "continuous emission monitoring system" (or "CEMS") in 40 CFR Part 75 shall be replaced by the terms "NOx budget unit," "NOx authorized account representative," and "continuous emission monitoring system" (or "CEMS"), respectively, as defined in OAC rule 3745-14-01(B).  
[OAC rule 3745-14-08(A)]
- 6.o** The permittee shall operate and maintain equipment to continuously monitor and record nitrogen oxides emissions from these emissions units in units of the applicable standards. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75. Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software. This includes all systems required to monitor the NOx emission rate, NOx concentration, heat input rate, and stack flow rate, in accordance with 40 CFR Parts 75.71 and 75.72. The permittee shall comply with the initial and re-certification procedures of 40 CFR Part 75. The permittee shall maintain on-site documentation from the USEPA or the Ohio EPA that the continuous nitrogen oxides monitoring system has been certified in accordance with 40 CFR Part 75. The letter of certification shall be made available to the Director upon request. The permittee shall maintain records of the following data obtained by the continuous nitrogen oxides monitoring system: emissions of nitrogen oxides in lb/mmBtu actual heat input on an hourly average basis, emissions of nitrogen oxides in lbs/hr, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments. Whenever the monitoring system fails to meet the quality assurance or data validation requirements of 40 CFR Part 75, data shall be substituted using the applicable procedures in Subpart D, Appendix D, or Appendix E of 40 CFR Part 75.  
[OAC rules 3745-14-01(E)(2)(a), 3745-14-01(E)(5)(a)(ii), 745-14-08(A)(2)(a) through (A)(2)(d), 3745-14-08(B)(1), and 3745-14-08(C)(1)]
- 6.p** The permittee shall comply with the monitoring plan requirements of 40 CFR Part 75.62, except that the monitoring plan is only required to include information required by 40 CFR Part 75, Subpart H.  
[OAC rule 3745-14-08(E)(2)(b)]
- 6.q** The NOx authorized account representative of the NOx budget unit shall submit the reports and compliance certifications required under the NOx budget trading program, including those under OAC rules 3745-14-04 and 3745-14-08, to the Director and Administrator.  
[OAC rule 3745-14-01(E)(4)(b)]
- 6.r** Each submission under the NOx budget trading program shall be submitted, signed, and certified by the NOx authorized account representative for each NOx budget source on behalf of which the submission is made. Each such submission shall include the following certification statement by the NOx authorized account representative:

"I am authorized to make this submission on behalf of the owners and operators of the NOx budget sources or NOx budget units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

If the NOx authorized account representative for a NOx budget unit subject to an acid rain emission limitation who signed and certified any submission that is made under Subpart F or G of 40 CFR Part 75 and which includes data and information required under OAC rule 3745-14-08 or Subpart H of 40 CFR Part 75 is not the same person as the designated representative or the alternate designated representative for the unit under 40 CFR Part 72, then the submission shall also be signed by the designated representative or the alternate designated representative.

[OAC rules 3745-14-02(A)(5) and 3745-14-08(E)(1)(b)]

**A. State and Federally Enforcable Section (continued)**

- 6.s** The NOx authorized account representative shall submit quarterly reports covering the period May 1 through September 30 of each year and including the data described in 40 CFR 75.74(c)(6). The NOx authorized account representative shall submit such quarterly reports, beginning with the calendar quarter covering May 1 through June 30, 2003. The NOx authorized account representative shall submit each quarterly report to the Administrator within thirty days following the end of the calendar quarter covered by the report. Quarterly reports shall be submitted in the manner specified in 40 CFR Part 75, Subpart H.  
[OAC rules 3745-14-08(E)(4)(b) and 3745-14-08(E)(4)(c)(i)]
- 6.t** The NOx authorized account representative shall submit to the Administrator a compliance certification in support of each quarterly report based on a reasonable inquiry of those persons with primary responsibility for ensuring that all of the unit's emissions are correctly and fully monitored. The compliance certification shall state that:
- i. the monitoring data submitted were recorded in accordance with the applicable requirements of OAC rule 3745-14-08 and 40 CFR Part 75, including the quality assurance procedures and specifications; and
  - ii. for a unit with add-on NOx emission controls and for all hours where data are substituted in accordance with 40 CFR Part 75.34(a)(1), the add-on emission control were operating within the range of parameters listed in the quality assurance program under Appendix B of 40 CFR Part 75 and the substitute values do not systematically underestimate the NOx emissions.  
[OAC rule 3745-14-08(E)(4)(d)(i) and (ii)]
- 6.u** The NOx authorized account representative for a NOx budget unit shall submit written notice of monitoring system certification and re-certification test dates to the Director and the Administrator in accordance with 40 CFR Part 75.61. The NOx authorized account representative shall submit a certification application to the Administrator, U.S. EPA, Region V Office, and the Director within forty-five days after completing all initial or re-certification tests required under paragraph (B) of OAC rule 3745-14-08, including the information required under Subpart H of 40 CFR Part 75.  
[OAC rules 3745-14-08(D) and 3745-14-08(E)(3)]
- 6.v** For each control period in which one or more NOx budget units at a source are subject to the NOx budget emission limitation, the NOx authorized account representative of the source shall submit to the Director and the Administrator, by November 30 of that year, a compliance certification report for each source covering all such units. The NOx authorized account representative shall include the following elements in the compliance certification report, in a format prescribed by the Administrator, concerning each unit at the source and subject to the NOx budget emission limitation for the control period covered by the report:
- i. identification of each NOx budget unit;
  - ii. at the NOx authorized account representative's option, the serial numbers of the NOx allowances that are to be deducted from each unit's compliance account under paragraph (E) of OAC rule 3745-14-06 for the control period;
  - iii. at the NOx authorized account representative's option, for units sharing a common stack and having NOx emissions that are not monitored separately or apportioned in accordance with OAC rule 3745-14-08, the percentage of allowances that is to be deducted from each unit's compliance account under paragraph (E)(5) of OAC rule 3745-14-06; and
  - iv. the compliance certification under paragraph (A)(3) of OAC rule 3745-14-04.  
[OAC rules 3745-14-04(A)(1) and 3745-14-04(A)(2)]

**A. State and Federally Enforcable Section (continued)**

- 6.w** In the compliance certification report under Section A.6.v.iv above, the NOx authorized account representative shall certify, based upon reasonable inquiry of those persons with the primary responsibility for operating the source and the NOx budget units at the source in compliance with the NOx budget trading program, whether each NOx budget unit for which the compliance certification is submitted was operated during the calendar year covered by the report in compliance with the requirements of the NOx budget trading program applicable to the unit, including all the following:
- i. whether the unit was operated in compliance with the NOx budget emission limitation;
  - ii. whether the monitoring plan that governs the unit has been maintained to reflect the actual operation and monitoring of the unit, and contains all information necessary to attribute NOx emissions to the unit, in accordance with OAC rule 3745-14-08;
  - iii. whether all the NOx emissions from the unit, or group of units (including the unit) using a common stack, were monitored or accounted for through the missing data procedures and reported in the quarterly monitoring reports, including whether conditional data were reported in the quarterly reports in accordance with OAC rule 3745-14-08, and if conditional data were reported, the permittee shall indicate whether the status of all conditional data has been resolved and all necessary quarterly report submissions have been made; and
  - iv. whether the facts that form the basis for certification under OAC rule 3745-14-08 of each monitor at the unit or group of units (including the unit) using a common stack, or for using an excepted monitoring method or alternative monitoring method approved under OAC rule 3745-14-08, if any, have changed. If a change is required to be reported under Section A.1.v.iv above, specify the nature of the change, the reason for the change, when the change occurred, and how the unit's compliance status was determined subsequent to the change, including what method was used to determine emissions when a change mandated the need for monitor re-certification. [OAC rule 3745-14-04(A)(3)]
- 6.x** The NOx authorized account representative shall submit a complete NOx budget permit renewal application for the NOx budget source covering the NOx budget units at the source in accordance with paragraph (E) of OAC rule 3745-77-08.  
[OAC rule 3745-14-03(B)(3)(a)]
- 6.y** The emission measurements recorded and reported in accordance with OAC rule 3745-14-08 shall be used to determine compliance by the unit with the NOx budget emission limitation under paragraph (E)(3) of OAC rule 3745-14-01.  
[OAC rule 3745-14-01(E)(2)(b)]
- 6.z** The permittee shall develop and maintain a written quality assurance/quality control plan for each continuous NOx monitoring system designed to ensure continuous valid and representative readings of NOx emissions in units of the applicable standard. The plan shall follow the requirements of 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous NOx monitoring system must be kept on-site and available for inspection during regular office hours.  
[OAC rules 3745-14-08(A)(2)(c) and 3745-14-08(A)(2)(d)]

**A. State and Federally Enforcable Section (continued)**

**7. 40 CFR 63.447 Clean condensate alternative.**

As an alternative to the requirements specified in sections 63.443(a)(1)(ii) through (a)(1)(v) for the control of HAP emissions from pulping systems using the kraft process, an owner or operator must demonstrate to the satisfaction of the Administrator, by meeting all the requirements below, that the total HAP emissions reductions achieved by this clean condensate alternative technology are equal to or greater than the total HAP emission reductions that would have been achieved by compliance with sections 63.443(a)(1)(ii) through (a)(1)(v).

(a) For the purposes of this section only the following additional definitions apply.

(1) Clean condensate alternative affected source means the total of all HAP emission points in the pulping, bleaching, causticizing, and papermaking systems (exclusive of HAP emissions attributable to additives to paper machines and HAP emission points in the LVHC system).

(2) Causticizing system means all equipment associated with converting sodium carbonate into active sodium hydroxide. The equipment includes smelt dissolving tanks, lime mud washers and storage tanks, white and mud liquor clarifiers and storage tanks, slakers, slaker grit washers, lime kilns, green liquor clarifiers and storage tanks, and dreg washers ending with the white liquor storage tanks prior to the digester system, and any other equipment serving the same function as those previously listed.

(3) Papermaking system means all equipment used to convert pulp into paper, paperboard, or market pulp, including the stock storage and preparation systems, the paper or paperboard machines, and the paper machine white water system, broke recovery systems, and the systems involved in calendering, drying, on-machine coating, slitting, winding, and cutting.

(b) Each owner or operator shall install and operate a clean condensate alternative technology with a continuous monitoring system to reduce total HAP emissions by treating and reducing HAP concentrations in the pulping process water used within the clean condensate alternative affected source.

(c) Each owner or operator shall calculate HAP emissions on a kilogram per megagram of ODP basis and measure HAP emissions according to the appropriate procedures contained in ?? 63.457.

(d) Each owner or operator shall determine the baseline HAP emissions for each equipment system and the total of all equipment systems in the clean condensate alternative affected source based on the following:

(1) Process and air pollution control equipment installed and operating on December 17, 1993, and

(2) Compliance with the following requirements that affect the level of HAP emissions from the clean condensate alternative affected source:

(i) The pulping process condensates requirements in section 63.446;

(ii) The applicable effluent limitation guidelines and standards in 40 CFR part 430, subparts A, B, D, and E; and

(iii) All other applicable requirements of local, State, or Federal agencies or statutes.

(e) Each owner or operator shall determine the following HAP emission reductions from the baseline HAP emissions determined in paragraph (d) of this section for each equipment system and the total of all equipment systems in the clean condensate alternative affected source:

(1) The HAP emission reduction occurring by complying with the requirements of sections 63.443(a)(1)(ii) through (a)(1)(v); and

(2) The HAP emissions reduction occurring by complying with the clean condensate alternative technology.

**A. State and Federally Enforcable Section (continued)**

(f) For the purposes of all requirements in this section, each owner or operator may use as an alternative, individual equipment systems (instead of total of all equipment systems) within the clean condensate alternative affected source to determine emissions and reductions to demonstrate equal or greater than the reductions that would have been achieved by compliance with sections 63.443(a)(1)(ii) through (a)(1)(v).

(g) The initial and updates to the control strategy report specified in section 63.455(b) shall include to the extent possible the following information:

(1) A detailed description of:

(i) The equipment systems and emission points that comprise the clean condensate alternative affected source;

(ii) The air pollution control technologies that would be used to meet the requirements of sections 63.443(a)(1)(ii) through (a)(1)(v); and

(iii) The clean condensate alternative technology to be used.

(2) Estimates and basis for the estimates of total HAP emissions and emission reductions to fulfill the requirements of paragraphs (d), (e), and (f) of this section.

(h) Each owner or operator shall report to the Administrator by the applicable compliance date specified in section 63.440(d) or (e) the rationale, calculations, test procedures, and data documentation used to demonstrate compliance with all the requirements of this section.

**B. State Only Enforceable Section**

1. The following insignificant emissions units are located at this facility:

B016 - Turbine Room Standby Generator;  
B019 - Mobile Standby Generator;  
F003 - No. 12 Machine Bulk Starch Storage;  
F004 - No.12 Machine Trim System;  
F005 - Carbonless Trim System No. 1 and No. 2;  
F006 - Fresh Lime Silo;  
F007 - No.1 Softener Tank Lime Storage Bin;  
F008 - No. 2 Softener Tank Lime Storage Bin;  
F012 - Chilpaco Bulk Starch Storage;  
F013 - Lime Crusher/Conveyor;  
F020 - Chilpaco Trim System (North);  
F021 - No.12 Paper Machine Coating Kitchen (Starch Weigh Tank);  
F022 - Dry Starch Handling System (Raw Material Storage Tanks, Dry Starch Makedown System, and Coating Dispersion Tank);  
F023 - Starch Silo;  
G001 - Gasoline Dispensing;  
P003 - No.12 Paper Machine Starch Cooker No.1 and No.2;  
P018 - No. 23 and No. 24 Paper Machines Starch Storage System;  
P020 - No. 23 and No. 24 Paper Machines Color Kitchen;  
P021 - No. 24 Paper Machine Size Press #1;  
P022 - No. 24 Paper Machine Size Press #2;  
P023 - No. 23 Paper Machine Size Press #1;  
P024 - Carbonless Capsule Plant;  
T050 - Methanol Storage;  
T051 - 30,000-gallon Latex Storage;  
T054 - Caustic Storage Tank (Former Alcohol Tank);  
T056 - 50,000-gallon D-110 Tank;  
T059 - 15,000-gallon Flowco 50-5 Tank;  
T070 - 65% Tank;  
T071 - Latex Storage Tank;  
T073 - Weak Liquor Tank;  
T074 - Green Liquor Clarifier;  
Z025 - Brown Stock Chests;  
Z030 - Weak Liquor Tanks;  
Z032 - Heavy Black Liquor Storage Tank;  
Z140 - Salt Cake Mix Tanks;  
Z150 - Reausticizing Area;  
Z155 - White Liquor Pressure Filters (2);  
Z180 - Hot Lime Silo;  
Z205 - Secondary Fiber System;  
Z220 - De-inking System;  
Z365 - No.32 Coater Kady Mills No.1 and 2;  
P370 - Chilpaco Additive/Starch System  
Z371 - Chilpaco Additive Mix Tank;  
Z372 - Chilpaco Cooker No.1;  
Z373 - Chilpaco Cooker No.2;  
Z374 - Chilpaco Cooker No.3;  
P360 - No. 32 Color Kitchen  
Z470 - No.10 and 11 Paper Machine Additive/Starch System;

- B. 2.** ~~July Enforcement Section~~ Machine Starch Cooker;  
Z511 - No.12 Paper Machine Additive Mix Tank;  
Z600 - Cast Coaters System;  
Z620 - No.10 Coater Color Kitchen;  
P621 - Billblade Coating Operation;  
Z622 - No.10 Coater Color Kitchen Makedown Area;  
Z623 - Billblade Makedown Tank;  
Z625 - No.10 and 11 Coater Starch Cookers;  
Z640 - No.11 Coater Color Kitchen;  
Z641 - No.11 Coater Color Kitchen Makedown Area;  
Z660 - No.12 Coater Color Kitchen;  
Z661 - No.12 Color Kitchen Makedown Area;  
Z665 - No.12 Coater Starch Cooker;  
Z740 - Precipitator Fly Ash Silo;  
Z750 - Mechanical Fly Ash System;  
Z840 - Carpentry Shop;  
P851 - Glue Room;  
Z852 - Print Shop;  
Z860 - Sludge Pile;  
Z861 - Lime Mud Stockpiling and Handling;  
P870 - Mead ID No. 716 (Air Compressor Generator);  
Z871 - Mead ID No. 456 (Air Compressor Generator);  
P872 - Mead ID No. 422 (Air Compressor Generator);  
Z873 - Mead ID No. 605 (Air Compressor Generator);  
Z874 - Slaker Reject Pile and Material Handling;  
Z880 - Mead ID406 (Emergency Generator);  
P881 - Mead ID No. 401 (Air Compressor Generator);  
P882 - Mead ID No. 430 (Air Compressor Generator);  
Z883 - Mead ID No. 600 (Air Compressor Generator);  
Z913 - No. 12 Coater Cooling Tower;  
Z914 - Pulp Mill Cooling Tower;  
Z997 - Chilpaco Trim System (South); and  
Z999 - 12 Finishing Trim System.
- 3.** Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** No.5 Coal Boiler (B001)  
**Activity Description:** Steam generation

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Wet bottom, pulverized coal-fired boiler (C. E. model VU-40) having a maximum heat input capacity of 380 MMBtu/hr, capable of running on #2 fuel oil as backup fuel. The unit is controlled with a cyclone/multi-clone and an electrostatic precipitator. No. 5 Coal Boiler.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(C)(1)	0.10 lb of particulate emissions per MMBtu of actual heat input, when firing coal
	OAC rule 3745-17-10(B)(1)	0.020 lb of particulate emissions per MMBtu of actual heat input, when firing #2 fuel oil
	OAC rule 3745-18-77(A)	9.9 lbs of sulfur dioxide per MMBtu actual heat input

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in section A.I. above.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to continuously monitor and record the opacity of the visible particulate emissions from the combined emissions from units B001, B002 and B003. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

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

The permittee shall maintain a letter of certification from Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Ohio EPA Southeast District Office upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

2. [40 CFR Part 63.7(c) and 63.8(c)]  
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 40 CFR Part 60, Appendix B, Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan must be kept on site and available for inspection during regular office hours.
3. To obtain an exemption pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain a temperature monitor and recorder that measures and records the temperature of the boiler exhaust gases entering the ESP during (a) all periods of start-up until the ESP is operational or until the inlet temperature of the ESP achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b) all periods of shutdown until the inlet temperature of the ESP drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i). An electronic or hardcopy record of the temperatures during periods of start-up and shutdown shall be maintained.

The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in units of degrees Fahrenheit.

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

4. The permittee shall maintain daily records of the total quantity of coal burned, and the results of the analyses for ash content, sulfur content, heat content, the average sulfur dioxide emission rate (lbs/MMBtu), and the rolling, 30-day weighted average sulfur dioxide emission rate (lbs/MMBtu). The coal collection and sampling procedures and analyses for ash content, sulfur content, and heat content shall be performed in accordance with the following:

The permittee shall collect daily composite samples of the coal burned in this emissions unit. A sufficient number of individual samples shall be collected so that each composite sample is representative of the average quality of coal burned in this emissions unit during each calendar day. The coal sampling shall be performed in accordance with the most recent version of ASTM method D2234, Collection of a Gross Sample of Coal.

Each daily composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound). The analytical methods for ash content, sulfur content and heat content shall be the most recent version of: 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 D5865, Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval from the Ohio EPA Southeast District Office.

5. The permittee shall comply with the requirements of one of the following alternatives pertaining to the use of #2 fuel oil.

**5.a** Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

**5.b** Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

- 5.c** The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

#### **IV. Reporting Requirements**

1. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Ohio EPA Southeast District Office documenting all instances of opacity values in excess of the limitation specified in section A.I.1 of these terms and conditions, 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 limitations.

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action taken for each time period of monitoring system malfunction. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

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

2. The permittee shall submit quarterly deviation (excursion) reports that document any average daily sulfur dioxide emission rate, when firing coal, which was greater than 1.5 times the sulfur dioxide emission limitation specified in section A.I.1 of these terms and conditions and any rolling, 30-day weighted average sulfur dioxide emission rate greater than the sulfur dioxide emission limitation specified in section A.I.1 of these terms and conditions. These reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.
3. The permittee shall notify the Ohio EPA Southeast District Office in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from section A.III.5 above when firing #2 fuel oil. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 45 days after the deviation occurs.

#### **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:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:

0.10 lb of particulate emissions per MMBtu of actual heat input, when firing coal

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9). See section A.V.2.

**1.c** Emission Limitation:

0.020 lb of particulate emissions per MMBtu of actual heat input, when firing #2 fuel oil

Applicable Compliance Method:

Compliance with this emission limitation may be determined by multiplying an emission factor of 2.0 lbs of particulates/1000 gallons of fuel oil fired by the emissions unit's maximum hourly fuel oil firing capacity (2836 gallons/hr), dividing by the emissions unit's rated heat input capacity (380 MMBtu/hr) and dividing by 1000. This emission factor is specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

**1.d** Emission Limitation:

9.9 lbs of sulfur dioxide emissions per MMBtu of actual heat input

Applicable Compliance Method:

When firing fuel oil, compliance with the allowable sulfur dioxide emission limitation may be demonstrated by documenting that the sulfur content of each shipment of fuel oil received during the calendar month meets the limitation.

When firing coal, compliance with the allowable sulfur dioxide emission limitation may be demonstrated based upon the records required pursuant to section A.III.4.

If required, the permittee shall demonstrate compliance with the allowable sulfur dioxide emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 or 6A.

## **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 approximately 2.5 years after permit issuance 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 emission testing shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-17-03(B)(9);
  - d. the emission testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless other wise specified or approved by the Ohio EPA Southeast District Office.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA Southeast District Office's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the tests, 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 emission tests shall be submitted to the Ohio EPA Southeast District Office within 30 days following completion of the tests. The permittee may obtain additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Southeast District Office.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Wet bottom, pulverized coal-fired boiler (C. E. model VU-40) having a maximum heat input capacity of 380 MMBtu/hr, capable of running on #2 fuel oil as backup fuel. The unit is controlled with a cyclone/multi-clone and an electrostatic precipitator. No. 5 Coal Boiler.		See section B.VI.1 below.

**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**

1. A logbook documenting activities relating to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** No.7 Coal Boiler (B002)  
**Activity Description:** Steam generation

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Wet bottom, pulverized coal-fired boiler (C. E. model VU-405) having a maximum heat input capacity of 422 MMBtu/hr, capable of running on #2 fuel oil as backup fuel. The unit is controlled with a cyclone/multi-clone and an electrostatic precipitator. No. 7 Coal Boiler.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(C)(1)	0.10 lb of particulate emissions per MMBtu of actual heat input, when firing coal
	OAC rule 3745-17-10(B)(1)	0.020 lb of particulate emissions per MMBtu of actual heat input, when firing #2 fuel oil
	OAC rule 3745-18-77(A)	9.9 lbs of sulfur dioxide per MMBtu actual heat input

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in section A.I. above.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to continuously monitor and record the opacity of the visible particulate emissions from the combined emissions from units B001, B002 and B003. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

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

The permittee shall maintain a letter of certification from Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Ohio EPA Southeast District Office upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

2. [40 CFR Part 63.7(c) and 63.8(c)]  
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 40 CFR Part 60, Appendix B, Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan must be kept on site and available for inspection during regular office hours.
3. To obtain an exemption pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain a temperature monitor and recorder that measures and records the temperature of the boiler exhaust gases entering the ESP during (a) all periods of start-up until the ESP is operational or until the inlet temperature of the ESP achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b) all periods of shutdown until the inlet temperature of the ESP drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i). An electronic or hardcopy record of the temperatures during periods of start-up and shutdown shall be maintained.

The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in units of degrees Fahrenheit.

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

4. The permittee shall maintain daily records of the total quantity of coal burned, and the results of the analyses for ash content, sulfur content, heat content, the average sulfur dioxide emission rate (lbs/MMBtu), and the rolling, 30-day weighted average sulfur dioxide emission rate (lbs/MMBtu). The coal collection and sampling procedures and analyses for ash content, sulfur content, and heat content shall be performed in accordance with the following:

The permittee shall collect daily composite samples of the coal burned in this emissions unit. A sufficient number of individual samples shall be collected so that each composite sample is representative of the average quality of coal burned in this emissions unit during each calendar day. The coal sampling shall be performed in accordance with the most recent version of ASTM method D2234, Collection of a Gross Sample of Coal.

Each daily composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound). The analytical methods for ash content, sulfur content and heat content shall be the most recent version of: 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 D5865, Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval from the Ohio EPA Southeast District Office.

5. The permittee shall comply with the requirements of one of the following alternatives pertaining to the use of #2 fuel oil.

**5.a** Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

**5.b** Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

- 5.c** The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

#### IV. Reporting Requirements

1. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Ohio EPA Southeast District Office documenting all instances of opacity values in excess of the limitation specified in section A.I.1 of these terms and conditions, 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 limitations.

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action taken for each time period of monitoring system malfunction. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

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

2. The permittee shall submit quarterly deviation (excursion) reports that document any average daily sulfur dioxide emission rate, when firing coal, which was greater than 1.5 times the sulfur dioxide emission limitation specified in section A.I.1 of these terms and conditions and any rolling, 30-day weighted average sulfur dioxide emission rate greater than the sulfur dioxide emission limitation specified in section A.I.1 of these terms and conditions. These reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.
3. The permittee shall notify the Ohio EPA Southeast District Office in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from section A.III.4 above when firing #2 fuel oil. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 45 days after the deviation occurs.

#### 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:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:

0.10 lb of particulate emissions per MMBtu of actual heat input, when firing coal

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9). See section A.V.2.

**1.c** Emission Limitation:

0.020 lb of particulate emissions per MMBtu of actual heat input, when firing #2 fuel oil

Applicable Compliance Method:

Compliance with this emission limitation may be determined by multiplying an emission factor of 2.0 lbs of particulates/1000 gallons of fuel oil fired by the emissions unit's maximum hourly fuel oil firing capacity (2836 gallons/hr), dividing by the emissions unit's rated heat input capacity (380 MMBtu/hr) and dividing by 1000. This emission factor is specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

**1.d** Emission Limitation:

9.9 lbs of sulfur dioxide emissions per MMBtu of actual heat input

Applicable Compliance Method:

When firing fuel oil, compliance with the allowable sulfur dioxide emission limitation may be demonstrated by documenting that the sulfur content of each shipment of fuel oil received during the calendar month meets the limitation.

When firing coal, compliance with the allowable sulfur dioxide emission limitation may be demonstrated based upon the records required pursuant to section A.III.4.

If required, the permittee shall demonstrate compliance with the allowable sulfur dioxide emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 or 6A.

## **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 approximately 2.5 years after permit issuance and with 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 emission testing shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-17-03(B)(9);
  - d. the emission testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless other wise specified or approved by the Ohio EPA Southeast District Office.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA Southeast District Office's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the tests, 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 emission tests shall be submitted to the Ohio EPA Southeast District Office within 30 days following completion of the tests. The permittee may obtain additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Southeast District Office.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Wet bottom, pulverized coal-fired boiler (C. E. model VU-405) having a maximum heat input capacity of 422 MMBtu/hr, capable of running on #2 fuel oil as backup fuel. The unit is controlled with a cyclone/multi-clone and an electrostatic precipitator. No. 7 Coal Boiler.	OAC rule 3745-18-77(B)(1)	The emission limitation specified in this rule is less stringent than the emission limitation specified in section A.I.1.

**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**

- A logbook documenting activities relating to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** No.8 Coal Boiler (B003)  
**Activity Description:** Steam generation

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Wet bottom, pulverized coal-fired boiler (C. E. model VU-40) having a maximum heat input capacity of 505 MMBtu/hr, capable of running on #2 fuel oil as backup fuel. The unit is controlled with a cyclone/multi-clone and an electrostatic precipitator. No. 8 Coal Boiler.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(C)(1)	0.10 lb of particulate emissions per MMBtu of actual heat input, when firing coal
	OAC rule 3745-17-10(B)(1)	0.020 lb of particulate emissions per MMBtu of actual heat input, when firing #2 fuel oil
	OAC rule 3745-18-77(A)	9.9 lbs of sulfur dioxide per MMBtu actual heat input

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

1. The quality of the fuel oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in section A.I.1 above.

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to continuously monitor and record the opacity of the visible 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 continuous monitoring system consists of all the equipment used to acquire data and includes the data recording/processing hardware and software.

The permittee shall maintain a letter of certification from Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Ohio EPA Southeast District Office upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

2. To obtain an exemption pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain a temperature monitor and recorder that measures and records the temperature of the boiler exhaust gases entering the ESP during (a) all periods of start-up until the ESP is operational or until the inlet temperature of the ESP achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b) all periods of shutdown until the inlet temperature of the ESP drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i). An electronic or hardcopy record of the temperatures during periods of start-up and shutdown shall be maintained.

The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in units of degrees Fahrenheit.

3. [40 CFR Part 63.7(c) and 63.8(c)]  
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 40 CFR Part 60, Appendix B, Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan must be kept on site and available for inspection during regular office hours.

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

4. The permittee shall maintain daily records of the total quantity of coal burned, and the results of the analyses for ash content, sulfur content, heat content, the average sulfur dioxide emission rate (lbs/MMBtu), and the rolling, 30-day weighted average sulfur dioxide emission rate (lbs/MMBtu). The coal collection and sampling procedures and analyses for ash content, sulfur content, and heat content shall be performed in accordance with the following:

The permittee shall collect daily composite samples of the coal burned in this emissions unit. A sufficient number of individual samples shall be collected so that each composite sample is representative of the average quality of coal burned in this emissions unit during each calendar day. The coal sampling shall be performed in accordance with the most recent version of ASTM method D2234, Collection of a Gross Sample of Coal.

Each daily composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound). The analytical methods for ash content, sulfur content and heat content shall be the most recent version of: 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 D5865, Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval from the Ohio EPA Southeast District Office.

5. The permittee shall comply with the requirements of one of the following alternatives pertaining to the use of #2 fuel oil.

**5.a** Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

**5.b** Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

- 5.c** The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

#### **IV. Reporting Requirements**

1. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Ohio EPA Southeast District Office documenting all instances of opacity values in excess of the limitation specified in section A.I.1 of these terms and conditions, 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 limitations.

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action taken for each time period of monitoring system malfunction. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

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

2. The permittee shall submit quarterly deviation (excursion) reports that document any average daily sulfur dioxide emission rate, when firing coal, which was greater than 1.5 times the sulfur dioxide emission limitation specified in section A.I.1 of these terms and conditions and any rolling, 30-day weighted average sulfur dioxide emission rate greater than the sulfur dioxide emission limitation specified in section A.I.1 of these terms and conditions. These reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.
3. The permittee shall notify the Ohio EPA Southeast District Office in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from section A.III.4 above when firing #2 fuel oil. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 45 days after the deviation occurs.

#### **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:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:

0.10 lb of particulate emissions per MMBtu of actual heat input, when firing coal

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9). See section A.V.2.

**1.c** Emission Limitation:

0.020 lb of particulate emissions per MMBtu of actual heat input, when firing #2 fuel oil

Applicable Compliance Method:

Compliance may be determined by multiplying an emission factor of 2.0 lbs of particulates/1000 gallons of fuel oil fired by the emissions unit's maximum hourly fuel oil firing capacity (3504 gallons/hr), dividing by the emissions unit's rated heat input capacity (505 MMBtu/hr) and dividing by 1000. This emission factor is specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

**1.d** Emission Limitation:

9.9 lbs of sulfur dioxide emissions per MMBtu of actual heat input

Applicable Compliance Method:

When firing fuel oil, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of fuel oil received during the calendar month meets the limitation.

When firing coal, compliance with the allowable sulfur dioxide emission limitation may be demonstrated based upon the records required pursuant to section A.III.4.

If required, the permittee shall demonstrate compliance with the allowable sulfur dioxide emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 or 6A.

## **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 approximately 2.5 years after permit issuance and with 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 emission testing shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-17-03(B)(9);
  - d. the emission testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless other wise specified or approved by the Ohio EPA Southeast District Office.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA Southeast District Office's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the tests, 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 emission tests shall be submitted to the Ohio EPA Southeast District Office within 30 days following completion of the tests. The permittee may obtain additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Southeast District Office.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Wet bottom, pulverized coal-fired boiler (C. E. model VU-40) having a maximum heat input capacity of 505 MMBtu/hr, capable of running on #2 fuel oil as backup fuel. The unit is controlled with a cyclone/multi-clone and an electrostatic precipitator. No. 8 Coal Boiler.	OAC rule 3745-18-77(B)(1)	The emission limitation specified in this rule is less stringent than the emission limitation specified in section A.I.1.

**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**

- A logbook documenting activities relating to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** No.9 Recovery Furnace (B011)  
**Activity Description:** Black liquor recovery and steam generation

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Recovery furnace controlled with an electrostatic precipitator. No. 9 Recovery Furnace	OAC rule 3745-31-05(A)(3) (PTI 06-5311)	The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart Db and OAC rule 3745-17-07(A).
	40 CFR Part 60, Subpart Db [40 CFR Part 60.43b(f)]	See A.I.2.a and A.I.2.b below. When firing #2 fuel oil, visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity or otherwise provided by rule.
	40 CFR Part 60, Subpart BB [40 CFR 60.282(a)(1)] [40 CFR 60.283(a)(2)]	The emission limitations specified in this rule are equivalent to or less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	When firing soap and/or concentrated black liquor, visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-10(C)	The emission limitation specified in 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 permittee shall not discharge into the atmosphere any exhaust gases in excess of the following emission limitations:
- i. 0.021gr/dscf of particulate emissions, corrected to 8% oxygen, on a dry basis;
  - ii. 37.31 lbs/hr and 163.5 tpy of particulate emissions, corrected to 8% oxygen, on a dry basis;
  - iii. 110 ppmv of nitrogen oxides (NOx), as a rolling, 30-day average, corrected to 8% oxygen, on a dry basis;
  - iv. 211.6 lbs/hr and 712.9 tpy of NOx, corrected to 8% oxygen, on a dry basis;
  - v. 300 ppmv of carbon monoxide (CO), corrected to 8% oxygen, on a dry basis;
  - vi. 270.2 lbs/hr and 1,183.4 tpy of CO, corrected to 8% oxygen, on a dry basis;
  - vii. 50 ppmv of volatile organic compounds (VOC), corrected to 8% oxygen, on a dry basis;
  - viii. 25.7 lbs/hr and 112.7 tpy of VOC, corrected to 8% oxygen, on a dry basis;
  - ix. 5 ppmv total reduced sulfur, as 12-hour average, corrected to 8% oxygen, on a dry basis;
  - x. 5.5 lbs/hr and 24 tpy of total reduced sulfur, corrected to 8% oxygen, on a dry basis;
  - xi. 55 ppmv of sulfur dioxide (SO<sub>2</sub>), corrected to 8% oxygen, on a rolling, 24-hour average;
  - xii. 407.6 lbs/hr, as a 3-hour average, and 495.9 tpy of SO<sub>2</sub>, corrected to 8% oxygen, on a dry basis;
  - xiii. 4.6 lbs/hr and 20.1 tpy of sulfuric acid, corrected to 8% oxygen, on a dry basis; and
  - xiv. 0.0056 lb/hr and 0.0245 tpy of lead, corrected to 8% oxygen, on a dry basis.
- 2.b** This emissions unit is subject to the requirements in 40 CFR Part 60, Subpart Db when firing #2 fuel oil, and shall comply with the following limitations.
- i. The sulfur content of the #2 fuel oil shall be equal to or less than 0.5%, by weight, or the sulfur dioxide emissions shall be limited to 0.5 lb/MMBtu, as a rolling, 30-day average.
  - ii. [60.42b(d)(1)]  
Based on SO<sub>2</sub> emission restrictions, the use of #2 fuel oil shall be limited to an annual capacity factor, calculated on a rolling, 12-month basis, of 30% or less.
  - iii. [60.44b(e)]  
Based on NO<sub>x</sub> emission restrictions, the use of #2 fuel oil shall be limited to an annual capacity factor, calculated on a rolling, 12-month basis, of 10% or less.

## II. Operational Restrictions

**None**

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to continuously monitor and record the opacity of the visible 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 continuous monitoring system consists of all the equipment used to acquire data and includes the data recording/processing hardware and software.

The permittee shall maintain a letter of certification from Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Ohio EPA Southeast District Office upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

2. The permittee shall operate and maintain existing equipment to continuously monitor and record O<sub>2</sub> from this emissions unit in units of percent O<sub>2</sub>. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain documentation from Ohio EPA that the continuous O<sub>2</sub> monitoring system has been certified in accordance with 40 CFR Part 60, Appendix B. The letter of certification shall be made available to the Ohio EPA Southeast District Office upon request.

The permittee shall maintain records of all data obtained by the continuous O<sub>2</sub> monitoring system including, but not limited to percent O<sub>2</sub> on an instantaneous (one-minute) basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

3. The permittee shall operate and maintain equipment to continuously monitor and record NO<sub>x</sub> emissions from this emissions unit in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain documentation from Ohio EPA that the continuous NO<sub>x</sub> monitoring system has been certified in accordance with 40 CFR Part 60, Appendix B. The letter of certification shall be made available to the Ohio EPA Southeast District Office upon request.

The permittee shall maintain records of all data obtained by the continuous NO<sub>x</sub> monitoring system including, emissions of NO<sub>x</sub> in units of the applicable standards in the appropriate averaging period (ppmv, lb(s)/hr, and rolling, 30-day), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

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

4. The permittee shall operate and maintain equipment to continuously monitor and record total reduced sulfur from this emissions unit in units of the applicable standards. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain documentation from Ohio EPA that the continuous total reduced sulfur monitoring system has been certified in accordance with 40 CFR Part 60, Appendix B. The letter of certification shall be made available to the Ohio EPA Southeast District Office upon request.

The permittee shall maintain records of all data obtained by the continuous total reduced sulfur monitoring system including, emissions of total reduced sulfur in units of the applicable standards in the appropriate averaging period (ppmv as a 12-hr block average and lb(s)/hr), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

5. The permittee shall operate and maintain equipment to continuously monitor and record SO<sub>2</sub> emissions from this emissions unit in units of the applicable standards. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain documentation from Ohio EPA that the continuous SO<sub>2</sub> monitoring system has been certified in accordance with 40 CFR Part 60, Appendix B. The letter of certification shall be made available to the Ohio EPA Southeast District Office upon request.

The permittee shall maintain records of all data obtained by the continuous SO<sub>2</sub> monitoring system including, but not limited to; emissions of SO<sub>2</sub> in ppmv, as a 24-hr average, and lbs/hr, as a 3-hr average; results of daily zero/span calibration checks; and magnitude of manual calibration adjustments.

6. The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

**6.a** Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

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

**6.b** Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

- 6.c** The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.
- 7.** The permittee shall track and record the actual amount of #2 fuel oil used each year, the total hours of operation for this emissions unit each year, and the calculated annual capacity factor.
- 8.** To obtain an exemption pursuant to OAC rule 3745-17-07(A)(3)(a)(i) or (A)(3)(b)(i), the permittee shall operate and maintain a temperature monitor and recorder that measures and records the temperature of the boiler exhaust gases entering the ESP during (a) all periods of start-up until the ESP is operational or until the inlet temperature of the ESP achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b) all periods of shutdown until the inlet temperature of the ESP drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i). An electronic or hardcopy record of the temperatures during periods of start-up and shutdown shall be maintained.

The temperature monitor and recorder shall be installed, calibrated, operated, and maintained in accordance with manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in units of degrees Fahrenheit.

- 9.** [63.7(c) and 63.8(c)]  
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 40 CFR Part 60, Appendix B, Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
- 10.** Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous NOx monitoring system and the continuous total reduced sulfur monitoring system designed to ensure continuous valid and representative readings of the applicable standard. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to each continuous monitoring system shall be kept on site and available for inspection during regular office hours.

#### **IV. Reporting Requirements**

- 1.** The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA Southeast District Office documenting all instances of opacity values in excess of the limitations specified in section A.I.1 of these terms and conditions, 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.

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA Southeast District Office documenting any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

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

- 2.a** The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA Southeast District Office, documenting the date, commencement and completion times, duration, magnitude, reason, and corrective action taken, of all instances of NO<sub>x</sub> values in excess of any limitations specified in section A.I.2.a of these terms and conditions.
- 2.b** The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA Southeast District Office documenting any continuous NO<sub>x</sub> monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action 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 also be included in the quarterly report.
- 2.c** If there are no excess NO<sub>x</sub> emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.
- 3.a** The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA Southeast District Office. These reports shall contain the date, commencement and completion times, duration, instances of average daily total reduced sulfur emission rates in excess of the emission limitations specified in section A.I.1 of the terms and conditions of this permit, and corrective action taken (if any). These reports shall also contain the total reduced sulfur emissions for the calendar quarter (in tons).
- 3.b** The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA Southeast District Office documenting any continuous total reduced sulfur monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action taken for each time period of source 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)**

- 3.c** If there are no excess emissions of total reduced sulfur during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action taken for each time period of 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 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.
- 4.a** The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA Southeast District Office documenting the date, commencement and completion times, duration magnitude, reason (if known), and corrective actions taken (if any), of all instances of SO<sub>2</sub> values in excess of the applicable limits (ppm and lbs/hr as a 3-hour average) specified in section A.I.1 of these terms and conditions, the average daily SO<sub>2</sub> emission rates (lbs/hr), and, when fuel oil is fired, the 30-day rolling average. These reports shall also contain the total SO<sub>2</sub> emissions for the calendar quarter (in tons).
- 4.b** The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA Southeast District Office documenting any continuous SO<sub>2</sub> monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action 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 also be included in the quarterly report.
- 4.c** If there are no excess SO<sub>2</sub> emissions during the calendar quarter, the permittee shall submit a statement to that effect along with date, time, reason, and corrective action taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.
- 4.d** If this facility has installed computerized data acquisition systems, an electronic summary of the quarterly excess emission reports shall be submitted.
- 5.** When firing only fuel oil, the permittee shall notify the Ohio EPA Southeast District Office in writing of any record which shows a deviation of the allowable SO<sub>2</sub> emission limitation based upon fuel analysis on a rolling, 30-day average of the calculated SO<sub>2</sub> emission rates in section A.III.2 of these terms and conditions. The notification shall include a copy of such record and shall be sent to the appropriate Ohio EPA District Office or local air agency within 45 days after the deviation occurs.
- 6.** The permittee shall notify the Ohio EPA Southeast District Office in writing of any record showing that the 30% capacity factor, required by section A.I.2.b.ii of these terms and conditions, or the 10% capacity factor, required by section A.I.2.b.iii, has been exceeded.
- 7.** The permittee shall also submit annual reports that specify the total particulate, nitrogen oxides, carbon monoxide, volatile organic compounds, total reduced sulfur, sulfur dioxide, sulfuric acid and lead emissions from this emissions unit for the previous year. The reports shall be submitted to the Ohio EPA Southeast District Office by January 31 of each year.

#### **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:

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

20% opacity as a 6-minute average, except for one 6-minute period per hour not to exceed 27% opacity

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and procedures specified in 40 CFR section 60.46b(d).

**1.b** Emission Limitations:

0.021gr/dscf of particulate emissions, corrected to 8% oxygen, on a dry basis

37.31 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission tests specified in section A.V.2.

**1.c** Emission Limitation:

163.5 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation and dividing by 2000 lbs/ton.

**1.d** Emission Limitation:

110 ppmv of NO<sub>x</sub>, corrected to 8% oxygen, on a dry basis, as a rolling, 30-day average

Applicable Compliance Method:

Compliance shall be demonstrated based upon the continuous emissions monitoring records kept in accordance with section A.III.3 of these terms and conditions.

**1.e** Emission Limitation:

211.6 lbs/hr of NO<sub>x</sub>, corrected to 8% oxygen, on a dry basis

Applicable Compliance Method:

Compliance may be demonstrated based upon the continuous emissions monitoring records kept in accordance with section A.III.3 of these terms and conditions.

If required, compliance shall be determined in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 7 or 7A.

**V. Testing Requirements (continued)**

**1.f** Emission Limitation:

712.9 tpy of NO<sub>x</sub>

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation and dividing by 2000 lbs/ton.

**1.g** Emission Limitation:

300 ppmv of CO, corrected to 8% oxygen, on a dry basis

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission tests specified in section A.V.2.

**1.h** Emission Limitation:

270.2 lbs/hr of CO, corrected to 8% oxygen, on a dry basis

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission tests specified in section A.V.2.

**1.i** Emission Limitation:

1,183.4 tpy of CO

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation and dividing by 2000 lbs/ton.

**1.j** Emission Limitation:

50 ppmv of VOC, corrected to 8% oxygen, on a dry basis

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission tests specified in section A.V.2.

**1.k** Emission Limitation:

25.7 lbs/hr of VOC, corrected to 8% oxygen, on a dry basis

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission tests specified in section A.V.2.

**V. Testing Requirements (continued)**

**1.l** Emission Limitation:

112.7 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation and dividing by 2000 lbs/ton.

**1.m** Emission Limitation:

5 ppmv of total reduced sulfur, as a 12-hour block average, corrected to 8% oxygen, on a dry basis

Applicable Compliance Method:

Compliance shall be demonstrated based upon the continuous emissions monitoring records kept in accordance with section A.III.4 of these terms and conditions.

**1.n** Emission Limitation:

5.5 lbs/hr of total reduced sulfur, corrected to 8% oxygen, on a dry basis

Applicable Compliance Method:

Compliance may be demonstrated based upon the continuous emissions monitoring records kept in accordance with section A.III.4 of these terms and conditions.

If required, compliance shall be determined in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 16 or 16A.

**1.o** Emission Limitation:

24 tpy of total reduced sulfur

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation and dividing by 2000 lbs/ton.

**1.p** Emission Limitation:

55 ppmv of SO<sub>2</sub>, as a rolling, 24-hr average, corrected to 8% oxygen, on a dry basis

Applicable Compliance Method:

Compliance may be demonstrated based upon the continuous emissions monitoring records kept in accordance with section A.III.5 of these terms and conditions.

If required, compliance shall be determined in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 6.

**V. Testing Requirements (continued)**

**1.q** Emission Limitation:

407.6 lbs/hr of SO<sub>2</sub>, as a 3-hour average, corrected to 8% oxygen, on a dry basis

Applicable Compliance Method:

Compliance may be demonstrated based upon the continuous emissions monitoring records kept in accordance with section A.III.5 of these terms and conditions.

If required, compliance shall be determined in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 6.

**1.r** Emission Limitation:

495.9 tpy of SO<sub>2</sub>

Applicable Compliance Method:

Compliance shall be demonstrated based upon the continuous emissions monitoring records kept in accordance with section A.III.5 of these terms and conditions.

**1.s** Emission Limitation:

4.6 lbs/hr of sulfuric acid

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission tests specified in section A.V.2.

**1.t** Emission Limitation:

20.1 tpy of sulfuric acid

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation and dividing by 2000 lbs/ton.

**1.u** Emission Limitation:

0.0056 lb/hr of lead

Applicable Compliance Method:

If required, compliance shall be determined in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 29.

**1.v** Emission Limitation:

0.0245 tpy of lead

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation and dividing by 2000 lbs/ton.

## **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 approximately 2.5 years after permit issuance and with 6 months prior to permit expiration;
  - b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emissions rate for particulates, CO, VOC and sulfuric acid;
  - c. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A; for CO, Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A; for VOC, Methods 1 through 4 and 25 or 25A of 40 CFR Part 60, Appendix A; and for sulfuric acid, Methods 1 through 4 and 8A of 40 CFR Part 60, Appendix A;
  - d. the emission testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless other wise specified or approved by the Ohio EPA Southeast District Office.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA Southeast District Office's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the tests, 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 emission tests shall be submitted to the Ohio EPA Southeast District Office within 30 days following completion of the tests. The permittee may obtain 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**

1. The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart MM, National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills by March 13, 2004.

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Recovery furnace controlled with an electrostatic precipitator. No. 9 Recovery Furnace	OAC rule 3745-73-03(A)(1)	The requirements of this rule are less stringent than the requirements specified in section A.I.1.

**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**

- Logbooks documenting activities relating to the continuous opacity, SO<sub>2</sub>, NO<sub>x</sub>, O<sub>2</sub> and total reduced sulfur monitoring systems must be kept on site and available for inspection during regular office hours.

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** No.6 Wood Residue Boiler (B013)

**Activity Description:** Steam generation

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Wood residue boiler having a maximum heat input capacity of 539 MMBtu/hr, and controlled with cyclones, a wet scrubber and a wet electrostatic precipitator (ESP) - capable of using #2 fuel oil as a backup fuel. No. 6 Wood Residue Boiler.	OAC rule 3745-31-05(A)(3) (PTI 06-368)	0.10 lb of particulate emissions per MMBtu of actual heat input  Compliance with this rule also includes compliance with OAC rules 3745-17-07(A) and 3745-18-06(D).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-18-06(D)	1.6 lbs of sulfur dioxide (SO <sub>2</sub> ) per MMBtu of actual heat input, when burning #2 fuel oil in the emissions unit
	OAC rule 3745-17-10(C)	The emission limitation specified in this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- This emissions unit and emissions unit B002 (No.7 Coal Boiler) shall not be taken out of service at the same time, except during emergency outages, when the noncondensable total reduced sulfur gases from emissions unit P015 are vented to either this emissions unit or emissions unit B002 (No.7 Coal Boiler).
- The normal operating scenario is to operate the cyclones, wet ESP and the scrubber for particulate control. If the wet ESP is off-line, efforts shall be made to return it to service as expeditiously as possible. When the wet ESP is off-line (Alternate Operating Scenario), the permittee shall restrict the steam flow rate for this emissions unit to 200,000 lbs/hr of steam or less.

## II. Operational Restrictions (continued)

3. The minimum pressure drop or pressure drop range across the scrubber, and the minimum scrubber water flow rate shall be determined during the initial performance test that demonstrates that the emission unit is in compliance. That minimum pressure drop or pressure drop range across the scrubbers and minimum scrubber water flow rate shall be continuously maintained at all times while the emissions unit is in operation.
4. The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable SO<sub>2</sub> emission limitation specified in section A.I.1 above.
- 5.a The average water flow rate (in gallons per minute) to the wet ESP shall be no less than the average water flow rate, as a 3-hour average, during the most recent emissions test that demonstrated the emissions unit was in compliance with the particulate emission limitation in section A.I.1.
- 5.b The average total combined power input (in kilowatts) to all fields of the wet ESP, for any 3-hour block of time when the emissions unit is in operation, shall be no less than 90 percent of the total combined power input, as a 3-hour average, during the most recent emissions test that demonstrated the emissions unit was in compliance with the particulate emission limitation in section A.I.1.
- 5.c The minimum number of fields on-line in the wet ESP, for any 3-hour block of time when the emissions unit is in operation, shall be no less than the number of fields on-line during the most recent emissions test that demonstrated the emissions unit was in compliance with the particulate emission limitation in section A.I.1.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. the pressure drop across the scrubber, in inches of water, on a rolling, 3-hour basis;
- b. the scrubber water flow rate, in gallons per minute, on a rolling, 3-hour basis; and
- c. the downtimes for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

If the pressure drop across the scrubber is not maintained at or above the specified level or the scrubber water flow rate is not maintained at or above the specified level, then appropriate corrective actions shall be pursued. The permittee may reestablish these minimum values based upon data collected during the most recent emission tests that demonstrate that the emissions unit was in compliance with the applicable requirements, and any future corrective actions shall take place based upon these revised values.

2. The permittee shall properly operate and maintain equipment to continuously monitor and record the wet ESP water flow rate, the number of wet ESP fields on-line, and the combined power input through the wet ESP while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall record all time periods when the emissions unit was in operation and the wet ESP was not on-line.

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

- 3.** The permittee shall properly operate and maintain equipment to continuously monitor and record the steam flow rate from this emissions unit. The monitoring and recording devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the average hourly steam flow rate for all time periods when the emissions unit is in operation and the wet ESP is not on-line.

- 4.** The permittee shall comply with the requirements of either Alternative 1 or Alternative 2 below pertaining to the use of #2 fuel oil.

**4.a** Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

**4.b** Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).)

- 4.c** The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all periods of time during which the static pressure drop across the scrubber was not maintained at or above the level specified in section A.II when the emissions unit was in operation;
  - b. all periods of time during which the scrubber water flow rate was not maintained at or above the level specified in section A.II when the emissions unit was in operation;
  - c. all periods of time during which the minimum number of wet ESP fields, specified in section A.II, were not in service when the emissions unit was in operation;
  - d. all periods of time during which the wet ESP water flow rate was not maintained at or above the level specified in section A.II when the emissions unit was in operation;
  - e. all periods of time during which the combined power input to the wet ESP was not maintained at or above the level specified in section A.II when the emissions unit was in operation;
  - f. all periods of time during which the emissions unit was in operation, the wet ESP was off-line, and the emissions unit's steam flow rate exceeded the level specified in section A.II; and
  - g. all periods of time during which the capture (collection ) systems, control devices, and monitoring systems were not in service when the associated emissions unit was in operation.

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

2. The permittee shall notify the Director (the Ohio EPA Southeast District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from Section A.III above. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Southeast District Office) within 45 days after the deviation occurs.

#### **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:

0.10 lb of particulate emissions per MMBtu actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission tests specified in section A.V.2.

- 1.b Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

## V. Testing Requirements (continued)

### 1.c Emission Limitation:

1.6 lbs of sulfur dioxide emissions per MMBtu of actual heat input when burning #2 fuel oil

Applicable Compliance Method:

Compliance may be determined based upon the records required pursuant to section A.III.6 above.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 or 6A.

### 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 approximately 2.5 years after permit issuance and with 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 emission testing shall be conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5;
- d. the emission testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Southeast District Office.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA Southeast District Office's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the tests, 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 emission tests shall be submitted to the Ohio EPA Southeast District Office within 30 days following completion of the tests. The permittee may obtain additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Southeast District Office.

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** No.1 Package Boiler (B014)  
**Activity Description:** Auxillary steam generation

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Natural gas-fired package boiler having a maximum heat input of 189.5 MMBtu/hr, and controlled with flue gas recirculation and low NOx burners. No. 1 Package Boiler.	OAC rule 3745-31-05(A)(3) (PTI 06-3404)	0.39 lb of carbon monoxide (CO) per MMBtu of actual heat input
		0.08 lb of nitrogen oxides (NOx) per MMBtu of actual heat input
		0.008 lb of particulate emissions per MMBtu of actual heat input
		Compliance with this rule also includes compliance with the applicable provisions of 40 CFR Part 60, Subpart Db and OAC rule 3745-17-07(A).
		See A.I.2.a and A.I.2.b below.
	40 CFR Part 60, Subpart Db [40 CFR Part 60.44b(a)(1)]	The NOx emission limitation specified in this rule is less stringent than the NOx emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-10(B)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-23-06(B)	See A.I.2.c below.

## 2. Additional Terms and Conditions

- 2.a Continuous emissions monitoring for NO<sub>x</sub> shall be performed in accordance with 40 CFR Part 60.48b(b).
- 2.b The NO<sub>x</sub> and CO emissions shall be controlled by employing a combination of flue gas recirculation and low NO<sub>x</sub> burners.
- 2.c The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the best available technology requirements established in Permit to Install 06-3404.

## II. Operational Restrictions

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

## III. Monitoring and/or Record Keeping Requirements

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

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain documentation from Ohio EPA that the continuous CO monitoring system has been certified in accordance with 40 CFR Part 60, Appendix B. The letter of certification shall be made available to the Ohio EPA Southeast District Office upon request.

The permittee shall maintain records of all data obtained by the continuous CO monitoring system including, emissions of CO in units of the applicable standards in the appropriate averaging period (lb/MMBtu as a 3-hour average), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

- 2. The permittee shall operate and maintain equipment to continuously monitor and record NO<sub>x</sub> emissions from this emissions unit in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.48b(b).

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain documentation from Ohio EPA that the continuous NO<sub>x</sub> monitoring system has been certified in accordance with 40 CFR Part 60, Appendix B. The letter of certification shall be made available to the Ohio EPA Southeast District Office upon request.

The permittee shall maintain records of all data obtained by the continuous NO<sub>x</sub> monitoring system including, emissions of NO<sub>x</sub> in units of the applicable standards in the appropriate averaging period (lb(s)/hr, lb/MMBtu as a 3-hr average, and lb/MMBtu as a rolling 30-day average), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

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

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - 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 emissions incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
4. 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.
2. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA Southeast District Office documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of NO<sub>x</sub> or CO values in excess of the applicable limitations specified in the terms and conditions of this permit. These reports shall also contain the total NO<sub>x</sub> and CO emissions for the calendar quarter (in tons).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA Southeast District Office documenting all instances of continuous CO monitoring system downtime and continuous NO<sub>x</sub> monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective actions taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective actions taken for each time period of emissions unit malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

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

3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Southeast District Office 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.1 of these terms and conditions shall be determined in accordance with the following methods:

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

0.39 lb of CO per MMBtu of actual heat input

Applicable Compliance Method:

Compliance with this emission limitation may be determined based upon the continuous CO monitoring system data required pursuant to section A.III.

Compliance with this emission limitation shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

**1.b** Emission Limitation:

0.08 lb of NO<sub>x</sub> per MMBtu of actual heat input

Applicable Compliance Method:

Compliance with this emission limitation may be determined based upon the continuous NO<sub>x</sub> monitoring system data required pursuant to section A.III.

Compliance with this emission limitation shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

**1.c** Emission Limitation:

0.008 lb of particulate emissions per MMBtu of actual heat input

Applicable Compliance Method:

If required, compliance shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

**1.d** Emission Limitation:

20% opacity, as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in 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 approximately 2.5 years after the effective date of this permit, and again within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for NO<sub>x</sub> and CO.
  - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emissions rates: for NO<sub>x</sub>, Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A; for CO, Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The emission testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Southeast District Office.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in Ohio EPA's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the tests, 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 emission tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Southeast District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, and obtain prior approval for the additional time from the Ohio EPA Southeast District Office.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** No.2 Package Boiler (B015)

**Activity Description:** Auxillary steam generation

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Natural gas-fired package boiler having a maximum heat input of 189.5 MMBtu/hr, and controlled with flue gas recirculation and low NOx burners. No. 2 Package Boiler.	OAC rule 3745-31-05(A)(3) (PTI 06-3404)	0.39 lb of carbon monoxide (CO) per MMBtu of actual heat input
		0.08 lb of nitrogen oxides (NOx) per MMBtu of actual heat input
		0.008 lb of particulate emissions per MMBtu of actual heat input
		Compliance with this rule also includes compliance with the applicable provisions of 40 CFR Part 60, Subpart Db and OAC rule 3745-17-07(A).
		See A.I.2.a and A.I.2.b below.
	40 CFR Part 60, Subpart Db [40 CFR Part 60.44b(a)(1)]	The NOx emission limitation specified in this rule is less stringent than the NOx emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-10(B)	The emission limitation specified in this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
	OAC rule 3745-23-06(B)	See A.I.2.c below.

## 2. Additional Terms and Conditions

- 2.a Continuous emissions monitoring for NO<sub>x</sub> shall be performed in accordance with 40 CFR Part 60.48b(b).
- 2.b The NO<sub>x</sub> and CO emissions shall be controlled by employing a combination of flue gas recirculation and low NO<sub>x</sub> burners.
- 2.c The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the best available technology requirements established in Permit to Install 06-3404.

## II. Operational Restrictions

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

## III. Monitoring and/or Record Keeping Requirements

- 1.a The permittee shall operate and maintain equipment to continuously monitor and record CO emissions from this emissions unit in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain documentation from Ohio EPA that the continuous CO monitoring system has been certified in accordance with 40 CFR Part 60, Appendix B. The letter of certification shall be made available to the Ohio EPA Southeast District Office upon request.

The permittee shall maintain records of all data obtained by the continuous CO monitoring system including, emissions of CO in units of the applicable standards in the appropriate averaging period (lb/MMBtu as a 3-hour average), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

- 1.b [40 CFR 63.7(c) and 63.8(c)]  
Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous CO monitoring system designed to ensure continuous valid and representative readings of CO emissions in units of the applicable standard. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous CO monitoring system must be kept on site and available for inspection during regular office hours.
- 2.a The permittee shall operate and maintain equipment to continuously monitor and record NO<sub>x</sub> emissions from this emissions unit in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.48b(b).

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain documentation from Ohio EPA that the continuous NO<sub>x</sub> monitoring system has been certified in accordance with 40 CFR Part 60, Appendix B. The letter of certification shall be made available to the Ohio EPA Southeast District Office upon request.

The permittee shall maintain records of all data obtained by the continuous NO<sub>x</sub> monitoring system including, emissions of NO<sub>x</sub> in units of the applicable standards in the appropriate averaging period (lb(s)/hr, lb/MMBtu as a 3-hr average, and lb/MMBtu as a rolling 30-day average), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

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

- 2.b** [40 CFR 63.7(c) and 63.8(c)]  
Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous NO<sub>x</sub> monitoring system designed to ensure continuous valid and representative readings of NO<sub>x</sub> emissions in units of the applicable standard. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous NO<sub>x</sub> monitoring system must be kept on site and available for inspection during regular office hours.
- 3.** The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- 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 emissions incident; and
  - e. any corrective actions taken to eliminate the visible emissions.
- 4.** 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.
- 2.** The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA Southeast District Office documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of NO<sub>x</sub> or CO values in excess of the applicable limitations specified in the terms and conditions of this permit. These reports shall also contain the total NO<sub>x</sub> and CO emissions for the calendar quarter (in tons).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA Southeast District Office documenting all instances of continuous CO monitoring system downtime and continuous NO<sub>x</sub> monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective actions taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective actions taken for each time period of emissions unit malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

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

- 3.** The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Southeast District Office 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.1 of these terms and conditions shall be determined in accordance with the following methods:

**1.a** Emission Limitation:

0.39 lb of CO per MMBtu of actual heat input

Applicable Compliance Method:

Compliance with this emission limitation may be determined based upon the continuous CO monitoring system data required pursuant to section A.III.

Compliance with this emission limitation shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

**1.b** Emission Limitation:

0.08 lb of NOx per MMBtu of actual heat input

Applicable Compliance Method:

Compliance with this emission limitation may be determined based upon the continuous NOx monitoring system data required pursuant to section A.III.

Compliance with this emission limitation shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

**1.c** Emission Limitation:

0.008 lb of particulate emissions per MMBtu of actual heat input

Applicable Compliance Method:

If required, compliance shall be demonstrated through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

**1.d** Emission Limitation:

20% opacity, as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in 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 approximately 2.5 years after the effective date of this permit, and again within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for NO<sub>x</sub> and CO.
  - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emissions rates: for NO<sub>x</sub>, Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A; for CO, Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
  - d. The emission testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Southeast District Office.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in Ohio EPA's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the tests, 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 emission tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Southeast District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, and obtain prior approval for the additional time from the Ohio EPA Southeast District Office.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Roadways and Parking Areas (F001)

**Activity Description:** Mill roadways and parking areas

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
roadways and parking areas	OAC rule 3745-31-05(A)(3) (PTI 06-1393)	<p>No visible particulate emissions from the paved roadways and parking areas, except for one minute during any 60-minute observation period.</p> <p>No visible particulate emissions from the unpaved roadways and parking areas, except for 3 minutes during any 60-minute observation period.</p> <p>See section A.1.2 below.</p>

##### 2. Additional Terms and Conditions

- 2.a All roadways, process and parking areas that are currently paved and that are accessible to the street sweeper shall be swept daily if weather conditions are sufficiently dry to allow dust to become airborne anytime during that day.
- 2.b Weekend street sweeping is not required unless abnormal conditions occur at the facility such as increased contractor activity, increased traffic flow, or dryer than normal weather conditions that could cause dust to become airborne.
- 2.c Asphalt that is removed or damaged shall be replaced at the earliest possible time.
- 2.d All paved areas not accessible to the street sweeper shall be watered as needed to reduce fugitive dust emissions.
- 2.e All unpaved areas shall be treated with asphalt emulsion, as needed, to reduce fugitive dust emissions. The only exception to the asphalt emulsion treatment of unpaved areas shall be watering, on a daily basis, during dry weather to reduce fugitive dust emissions.
- 2.f Speed limit signs indicating 15 mph speed limit shall be posted and maintained.

**2. Additional Terms and Conditions (continued)**

**2.g** The following paved areas are subject to the requirements of this permit:

paved roadways:

Hickory Street

East Mill

West Mill

wastewater access road - primary treatment area

paved parking areas:

coated parking area

Hickory Street parking area

North Mill parking area

South Mill parking area

**2.h** The unpaved areas subject to the requirements of this permit are listed below:

unpaved roadways:

wastewater access road - secondary treatment area

unpaved parking areas:

none

**2.i** The permittee shall employ best available control measures on all paved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the paved roadways and parking areas by flushing with water, sweeping, and/or watering at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

**2.j** The permittee shall promptly remove, in such a manner as to minimize or prevent resuspension, earth and/or other material from paved streets onto which such material has been deposited by trucking or earth moving equipment or erosion by water or other means.

**2.k** The permittee shall employ best available control measures on all unpaved roadways and parking areas for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the unpaved roadways and parking areas with water and/or any other suitable dust suppression chemicals at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

**2.l** The needed frequencies of implementation of the control measures shall be determined by the permittee's inspections pursuant to the requirements of section A.III of these terms and conditions. Implementation of the control measures shall not be necessary for an unpaved roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Implementation of any control measure may be suspended if unsafe or hazardous driving conditions would be created by its use.

## **2. Additional Terms and Conditions (continued)**

- 2.m** Any unpaved roadway or parking area, which during the term of this permit is paved or takes the characteristics of a paved surface due to the application of certain types of dust suppressants, may be controlled with the control measure specified above for paved surfaces. Any unpaved roadway or parking area that takes the characteristics of a paved roadway or parking area due to the application of certain types of dust suppressants shall remain subject to the visible emission limitation for unpaved roadways and parking areas. Any unpaved roadway or parking area that is paved shall be subject to the visible emission limitation for paved roadways and parking areas.
- 2.n** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.

## **II. Operational Restrictions**

**None**

## **III. Monitoring and/or Record Keeping Requirements**

- 1.** Except as otherwise provided in this section, the permittee shall perform inspections of the roadways and parking areas identified in sections A.I.2.h and A.I.2.i of these terms and conditions on a daily basis, when in use.
- 2.** The purpose of the inspections is to determine the need for implementing the above-mentioned control measures. The inspections shall be performed during representative, normal traffic conditions. No inspection shall be necessary for a roadway or parking area that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such events have ended.
- 3.** The permittee may, upon receipt of written approval from the Ohio EPA Southeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified inspection frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(3) of OAC rule 3745-77-08.
- 4.** The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed, including any inspection that was not performed due to snow and/or ice cover or precipitation;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
  - c. the dates the control measures were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented and the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measures.
- 5.** The information required in section A.III.4.d above shall be kept separately for paved roadways and parking areas and unpaved roadways and parking areas, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

#### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
  - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The quarterly deviation reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

#### **V. Testing Requirements**

1. If required, compliance with the visible particulate emission limitations for the paved roadways and parking areas and the unpaved roadways and parking areas identified above shall be determined in accordance with 40 CFR Part 60, Appendix A Method 22 and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(d) of OAC rule 3745-17-03.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Rotary Lime Kiln (P001)  
**Activity Description:** Conversion of CaCO<sub>3</sub> to CaO for use in generation of white liquor

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
rotary lime kiln for the conversion of CaCO <sub>3</sub> to CaO controlled with a wet scrubber	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
	OAC rule 3745-17-11(B)	Particulate emissions (PE) shall not exceed 19.15 lbs/hr. See section A.1.2.b below.
	40 CFR Part 63, Subpart MM [40 CFR 63.862(a)(1)(i)(C)]	0.15 g/dscm (0.064 gr/dscf) of PE, corrected to 10% oxygen See section A.1.2.a below.

##### 2. Additional Terms and Conditions

- 2.a The requirement to comply with this emission limitation shall begin on March 13, 2004.
- 2.b The requirement to comply with this particulate emission limitation shall terminate on the effective date of 40 CFR Part 63, Subpart MM.

##### II. Operational Restrictions

1. The minimum pressure drop or pressure drop range across the scrubber, and the minimum scrubber water flow rate shall be determined during the initial performance test that demonstrates that the emission unit is in compliance. That minimum pressure drop or pressure drop range across the scrubbers and minimum scrubber water flow rate shall be continuously maintained at all times while the emissions unit is in operation.
2. By March 13, 2004, the permittee shall revise its Startup, Shutdown and Malfunction Plan to meet the requirements of 40 CFR Part 63.866(a).

### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

- a. the pressure drop across the scrubber, in inches of water, on a rolling, 3-hour basis;
- b. the scrubber water flow rate, in gallons per minute, on a rolling, 3-hour basis; and
- c. the downtimes for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

If the pressure drop across the scrubber is not maintained at or below the specified level or the scrubber water flow rate is not maintained at or above the specified level, then appropriate corrective actions shall be pursued. The permittee may reestablish these minimum values based upon data collected during the most recent emission tests that demonstrate that the emissions unit was in compliance with the applicable requirements, and any future corrective actions shall take place based upon these revised values.

2. [40 CFR Part 63.864(a)]
  - (1)The owner or operator of each affected kraft or soda recovery furnace or lime kiln equipped with an Electro Static Precipitator (ESP) must install, calibrate, maintain, and operate a continuous opacity monitoring system that can be used to determine opacity at least once every successive 10- second period and calculate and record each successive 6-minute average opacity using the procedures in Secs. 63.6(h) and 63.8.
  - (2)The owner or operator of each affected kraft or soda recovery furnace, kraft or soda lime kiln, sulfite combustion unit, or kraft or soda smelt dissolving tank equipped with a wet scrubber must install, calibrate, maintain, and operate a continuous monitoring system that can be used to determine and record the pressure drop across the scrubber and the scrubbing liquid flow rate at least once every successive 15- minute period using the procedures in Sec. 63.8(c), as well as the following:
    - (i) The monitoring device used for the continuous measurement of the pressure drop of the gas stream across the scrubber must be certified by the manufacturer to be accurate to within a gage pressure of plus or minus 500 pascals (plus or minus 2 inches of water gage pressure); and
    - (ii) The monitoring device used for continuous measurement of the scrubbing liquid flow rate must be certified by the manufacturer to be accurate within plus or minus 5 percent of the design scrubbing liquid flow rate.
  - (3)The owner or operator of each affected semichemical combustion unit equipped with an Regenerative Thermal Oxidizer (RTO) must install, calibrate, maintain, and operate a continuous monitoring system that can be used to determine and record the operating temperature of the RTO at least once every successive 15-minute period using the procedures in Sec. 63.8(c). The monitor must compute and record the operating temperature at the point of incineration of effluent gases that are emitted using a temperature monitor accurate to within plus or minus 1 percent of the temperature being measured.
  - (4)The owner or operator of each affected source or process unit that uses a control device listed in paragraphs (a)(1) through (3) of this section may monitor alternative control device operating parameters subject to prior written approval by the Administrator.
  - (5)The owner or operator of each affected source or process unit that uses an air pollution control system other than those listed in paragraphs (a)(1) through (3) of this section must monitor the parameters as approved by the Administrator using the methods and procedures in Sec. 63.865(f).

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

(6)The owner or operator of each affected source or process unit complying with the gaseous organic HAP emissions limitations of Sec. 63.862(c)(1) through the use of an NonDirect Contact Evaporator (NDCE) recovery furnace equipped with a dry ESP system is not required to conduct any performance testing or any continuous monitoring to demonstrate compliance with the gaseous organic HAP emission limitation.

**3. [40 CFR Part 63.864(b)]**

(1)The owner or operator of each affected source or process unit subject to the requirements of this subpart is required to conduct an initial performance test using the test methods and procedures listed in Secs. 63.7 and 63.865, except as provided in paragraph (b)(3) of this section.

(2)Determination of operating ranges.

(i) During the initial performance test required in paragraph (b)(1) of this section, the owner or operator of any affected source or process unit must establish operating ranges for the monitoring parameters in paragraphs (a)(2) through (5) of 40 CFR 63.864(a), as appropriate; or

(ii) The owner or operator may base operating ranges on values recorded during previous performance tests or conduct additional performance tests for the specific purpose of establishing operating ranges, provided that test data used to establish the operating ranges are or have been obtained using the test methods required in this subpart. The owner or operator of the affected source or process unit must certify that all control techniques and processes have not been modified subsequent to the testing upon which the data used to establish the operating parameter ranges were obtained.

(iii) The owner or operator of an affected source or process unit may establish expanded or replacement operating ranges for the monitoring parameter values listed in paragraphs (a)(2) through (5) of 40 CFR 63.864(a) and established in paragraph (b)(2)(i) or (ii) of this section during subsequent performance tests using the test methods in Sec. 63.865.

(3)An initial performance test is not required to be conducted in order to determine compliance with the emissions limitations of Sec. 63.862(c)(1) if the affected source or process unit includes an NDCE recovery furnace equipped with a dry ESP system.

(4)After the Administrator has approved the PE emissions limits for each kraft or soda recovery furnace, smelt dissolving tank, and lime kiln, the owner or operator complying with an overall PM emission limit established in Sec. 63.862(a)(1)(ii) must demonstrate compliance with the HAP metals standard by demonstrating compliance with the approved PE emissions limits for each affected kraft or soda recovery furnace, smelt dissolving tank, and lime kiln, using the test methods and procedures in Sec. 63.865(b).

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

4. [40 CFR 63.864(c)]

(1) Following the compliance date, owners or operators of all affected sources or process units are required to implement corrective action, as specified in the startup, shutdown, and malfunction plan prepared under Sec. 63.866(a) if the monitoring exceedances in paragraphs (c)(1)(i) through (v) of this section occur:

(i) For a new or existing kraft or soda recovery furnace or lime kiln equipped with an ESP, when the average of ten consecutive 6-minute averages result in a measurement greater than 20 percent opacity;

(ii) For a new or existing kraft or soda recovery furnace, kraft or soda smelt dissolving tank, kraft or soda lime kiln, or sulfite combustion unit equipped with a wet scrubber, when any 3-hour average parameter value is outside the range of values established in paragraph (b)(2) of this section.

(iii) For a new or existing semichemical combustion unit equipped with an RTO, when any 1-hour average temperature falls below the temperature established in paragraph (b)(2) of this section;

(iv) For an affected source or process unit equipped with an alternative emission control system approved by the Administrator, when any 3-hour average value is outside the range of parameter values established in paragraph (b)(2) of this section; and

(v) For an affected source or process unit that is monitoring alternative operating parameters established in paragraph (a)(4) of this section, when any 3-hour average value is outside the range of parameter values established in paragraph (b)(2) of this section.

(2) Following the compliance date, owners or operators of all affected sources or process units are in violation of the standards of Sec. 63.862 if the monitoring exceedances in paragraphs (c)(2)(i) through (vi) of this section occur:

(i) For an existing kraft or soda recovery furnace equipped with an ESP, when opacity is greater than 35 percent for 6 percent or more of the operating time within any quarterly period;

(ii) For a new kraft or soda recovery furnace or a new or existing lime kiln equipped with an ESP, when opacity is greater than 20 percent for 6 percent or more of the operating time within any quarterly period;

(iii) For a new or existing kraft or soda recovery furnace, kraft or soda smelt dissolving tank, kraft or soda lime kiln, or sulfite combustion unit equipped with a wet scrubber, when six or more 3-hour average parameter values within any 6-month reporting period are outside the range of values established in paragraph (b)(2) of this section;

(iv) For a new or existing semichemical combustion unit equipped with an RTO, when any 3-hour average temperature falls below the temperature established in paragraph (b)(2) of this section;

(v) For an affected source or process unit equipped with an alternative air pollution control system approved by the Administrator, when six or more 3-hour average values within any 6-month reporting period are outside the range of parameter values established in paragraph (b)(2) of this section; and

(vi) For an affected source or process unit that is monitoring alternative operating parameters established in paragraph (a)(4) of this section, when six or more 3-hour average values within any 6-month reporting period are outside the range of parameter values established in paragraph (b)(2) of this section.

(3) For purposes of determining the number of nonopacity monitoring exceedances, no more than one exceedance will be attributed in any given 24-hour period.

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

5. [40 CFR 63.866(a)]  
Startup, shutdown, and malfunction plan. The owner or operator must develop and implement a written plan as described in Sec. 63.6(e)(3) that contains specific procedures to be followed for operating the source and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and control systems used to comply with the standards. In addition to the information required in Sec. 63.6(e), the plan must include the requirements in paragraphs (a)(1) and (2) of this section.
- (1) Procedures for responding to any process parameter level that is inconsistent with the level(s) established under Sec. 63.864(b)(2), including the following:
- (i) Procedures to determine and record the cause of an operating parameter exceedance and the time the exceedance began and ended; and
- (ii) Corrective actions to be taken in the event of an operating parameter exceedance, including procedures for recording the actions taken to correct the exceedance.
- (2) The startup, shutdown, and malfunction plan also must include the schedules listed in paragraphs (a)(2)(i) and (ii) of this section:
- (i) A maintenance schedule for each control technique that is consistent with, but not limited to, the manufacturer's instructions and recommendations for routine and long-term maintenance; and
- (ii) An inspection schedule for each continuous monitoring system required under Sec. 63.864 to ensure, at least once in each 24-hour period, that each continuous monitoring system is properly functioning.
6. [40 CFR 63.866(b)]  
The owner or operator of an affected source or process unit must maintain records of any occurrence when corrective action is required under Sec. 63.864(c)(1), and when a violation is noted under Sec. 63.864(c)(2).
7. [40 CFR 63.866(c)]  
In addition to the general records required by Sec. 63.10(b)(2), the owner or operator must maintain records of the information in paragraphs (c)(1) through (6) of this section: (1) Records of black liquor solids firing rates in units of megagrams/day or tons/day for all recovery furnaces and semichemical combustion units; (2) Records of CaO production rates in units of megagrams/day or tons/day for all lime kilns; (3) Records of parameter monitoring data required under Sec. 63.864, including any period when the operating parameter levels were inconsistent with the levels established during the initial performance test, with a brief explanation of the cause of the deviation, the time the deviation occurred, the time corrective action was initiated and completed, and the corrective action taken; (4) Records and documentation of supporting calculations for compliance determinations made under Secs. 63.865(a) through (e); (5) Records of monitoring parameter ranges established for each affected source or process unit; (6) Records certifying that an NDCE recovery furnace equipped with a dry ESP system is used to comply with the gaseous organic HAP standard in Sec. 63.862(c)(1).

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the levels specified in sections A.III.1 and A.III.2 of these terms and conditions:
- a. the pressure drop across the scrubber; and
- b. the scrubber water flow rate.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

#### IV. Reporting Requirements (continued)

**3.** [40 CFR 63.867(a)]

(1) Any owner or operator of a group of process units in a chemical recovery system at a mill complying with the PE limits in Sec. 63.862(a)(1)(ii) must submit the PE limits determined in Sec. 63.865(a) for each affected kraft or soda recovery furnace, smelt dissolving tank, and lime kiln to the Ohio EPA Southeast District Office for approval. The emissions limits must be submitted as part of the notification of compliance status required under subpart A of this part.

**4.** [40 CFR 63.867(b)]

(1) Any owner or operator of a group of process units in a chemical recovery system at a mill complying with the PE limits in Sec. 63.862(a)(1)(ii) must submit the PE limits determined in Sec. 63.865(a) for each affected kraft or soda recovery furnace, smelt dissolving tank, and lime kiln to the Ohio EPA Southeast District Office for approval. The emissions limits must be submitted as part of the notification of compliance status required under subpart A of this part.

(2) Any owner or operator of a group of process units in a chemical recovery system at a mill complying with the PE limits in Sec. 63.862(a)(1)(ii) must submit the calculations and supporting documentation used in Sec. 63.865(a)(1) and (2) to the Ohio EPA Southeast District Office as part of the notification of compliance status required under subpart A of this part.

(3) After the Ohio EPA Southeast District Office has approved the emissions limits for any process unit, the owner or operator of a process unit must notify the Ohio EPA Southeast District Office before any of the actions in paragraphs (b)(3)(i) through (iv) of this section are taken:

(i) The air pollution control system for any process unit is modified or replaced;

(ii) Any kraft or soda recovery furnace, smelt dissolving tank, or lime kiln in a chemical recovery system at a kraft or soda pulp mill complying with the PE limits in Sec. 63.862(a)(1)(ii) is shut down for more than 60 consecutive days;

(iii) A continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit is changed; or

(iv) The black liquor solids firing rate for any kraft or soda recovery furnace during any 24-hour averaging period is increased by more than 10 percent above the level measured during the most recent performance test.

(4) An owner or operator of a group of process units in a chemical recovery system at a mill complying with the PE limits in Sec. 63.862(a)(1)(ii) and seeking to perform the actions in paragraph (b)(3)(i) or (ii) of this section must recalculate the overall PE limits for the group of process units and resubmit the documentation required in paragraph (b)(2) of this section to the Ohio EPA Southeast District Office. All modified PE limits are subject to approval by the Ohio EPA Southeast District Office.

**5.** [40 CFR 63.867(c)]

The owner or operator must report quarterly if measured parameters meet any of the conditions specified in paragraph (c)(1) or (2) of Sec. 63.864. This report must contain the information specified in Sec. 63.10(c) of this part as well as the number and duration of occurrences when the source met or exceeded the conditions in Sec. 63.864(c)(1), and the number and duration of occurrences when the source met or exceeded the conditions in Sec. 63.864(c)(2). Reporting excess emissions below the violation thresholds of Sec. 63.864(c) does not constitute a violation of the applicable standard.

**6.** When no exceedances of parameters have occurred, the owner or operator must submit a semiannual report stating that no excess emissions occurred during the reporting period.

**7.** The owner or operator of an affected source or process unit subject to the requirements of this subpart and subpart S of this part may combine excess emissions and/or summary reports for the mill. [66 FR 3193, Jan. 12, 2001 as amended at 66 FR 16408, Mar. 26, 2001]

## 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:

20% opacity, as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
  - 1.b Emission Limitation:

PE shall not exceed 19.15 lbs/hr.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.
  - 1.c Emission Limitation:

0.15 g/dscm (0.064 gr/dscf) of PE, corrected to 10% oxygen, on a dry basis

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2. through 8.
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 approximately 2.5 years after permit issuance and within 6 months prior to permit expiration;
  - b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates; and
  - c. the emission testing shall be conducted in accordance with the test methods and procedures specified in OAC rule 3745-17-03(B)(10);
  - d. the emission testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless other wise specified or approved by the Ohio EPA Southeast District Office.

## V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in Ohio EPA's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the tests, 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 emission tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Southeast District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, and obtain prior approval for the additional time from the Ohio EPA Southeast District Office.

**3.** [40 CFR Part 63.865(a)]

The owner or operator of a process unit seeking to comply with a PE limit under Sec. 63.862(a)(1)(ii)(A) must use the procedures in paragraphs (a)(1) and (2) of section 63.865(b), using Equation 1.

**4.** [40 CFR Part 63.865(b)]

(1) For purposes of determining the concentration of PE emitted from each kraft or soda recovery furnace, sulfite combustion unit, smelt dissolving tank or lime kiln, Method 5 or 29 in appendix A of 40 CFR part 60 must be used, except that Method 17 in appendix A of 40 CFR part 60 may be used in lieu of Method 5 or Method 29 if a constant value of 0.009 g/dscm (0.004 gr/dscf) is added to the results of Method 17, and the stack temperature is no greater than 205 deg.C (400 deg.F). The sampling time and sample volume for each run must be at least 60 minutes and 0.90 dscm (31.8 dscf). Water must be used as the cleanup solvent instead of acetone in the sample recovery procedure.

(2) For sources complying with paragraph (a) or (b) of Sec. 63.862, the PE concentration must be corrected to the appropriate oxygen concentration using Equation 7 of section 63.865(b).

(3) Method 3A or 3B in appendix A of 40 CFR part 60 must be used to determine the oxygen concentration. The gas sample must be taken at the same time and at the same traverse points as the particulate sample.

(4) For purposes of complying with of Sec. 63.862(a)(1)(ii)(A), the volumetric gas flow rate must be corrected to the appropriate oxygen concentration using Equation 8 of section 63.865(b).

(5) For purposes of selecting sampling port location and number of traverse points, determining stack gas velocity and volumetric flow rate, conducting gas analysis, and determining moisture content of stack gas, Methods 1 through 4 in appendix A of 40 CFR part 60 must be used.

(6) Process data measured during the performance test must be used to determine the black liquor solids firing rate on a dry basis and the CaO production rate. The owner or operator seeking to determine compliance with the gaseous organic HAP standard in Sec. 63.862(c)(1) without using an NDCE recovery furnace equipped with a dry ESP system must use Method 308 in appendix A of this part, as well as Methods 1 through 4 in appendix A of part 60 of this chapter. The sampling time and sample volume for each Method 308 run must be at least 60 minutes and 0.014 dscm (0.50 dscf), respectively.

## **V. Testing Requirements (continued)**

5. The owner or operator of an affected source or process unit seeking to demonstrate compliance with the standards in Sec. 63.862 using a control technique other than those listed in Sec. 63.864(a)(1) through (3) must provide to the Ohio EPA Southeast District Office a monitoring plan that includes a description of the control device, test results verifying the performance of the control device, the appropriate operating parameters that will be monitored, and the frequency of measuring and recording to establish continuous compliance with the standards. The monitoring plan is subject to the Ohio EPA's approval. The owner or operator of the affected source or process unit must install, calibrate, operate, and maintain the monitor(s) in accordance with the monitoring plan approved by the Ohio EPA Southeast District Office. The owner or operator must include in the information submitted to the Ohio EPA Southeast District Office proposed performance specifications and quality assurance procedures for the monitors. The Ohio EPA may request further information and will approve acceptable test methods and procedures. [66FR 3193, Jan. 12, 2001, as amended at 66 FR 37593, July 19, 2001]

## **VI. Miscellaneous Requirements**

1. The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart MM, National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semicemical Pulp Mills by March 13, 2004.

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
rotary lime kiln for the conversion of CaCO <sub>3</sub> to CaO controlled with a wet scrubber	OAC rule 3745-73-03(A)(4)(b)	40 parts per million of total reduced sulfur, on a dry basis and as a twelve-hour average, corrected to ten per cent oxygen by volume for lime kilns operated with cold-end temperatures less than of five hundred degrees Fahrenheit or having a length-to-diameter ratio of less than 20:1.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

- 1.a The permittee shall operate and maintain equipment to continuously monitor and record total reduced sulfur and O<sub>2</sub> emissions from this emissions unit in units of the applicable standards. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.
- 1.b Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.
- 1.c The permittee shall maintain documentation from Ohio EPA that the continuous total reduced sulfur and O<sub>2</sub> monitoring system have been certified in accordance with 40 CFR Part 60.13. The letter of certification shall be made available to the Ohio EPA Southeast District Office upon request.
- 1.d The permittee shall maintain records of all data obtained by the total reduced sulfur and O<sub>2</sub> monitoring systems including, but not limited to, emissions of total reduced sulfur in units of the applicable standard in the appropriate averaging period (12-hour average, determined as the arithmetic mean of the 12 previous 1-hour average total reduced sulfur concentrations), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments. A logbook dedicated to the total reduced sulfur monitoring system must be kept on site and available for inspection during regular office hours.

#### **IV. Reporting Requirements**

1. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA Southeast District Office documenting any continuous total reduced sulfur monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective actions taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective actions taken for each time period of source 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.
2. The permittee shall submit semiannual deviation (excursion) reports that (a) identify all 12-hour periods during which the total reduced sulfur emission limitation was exceeded and (b) describe any corrective actions taken to eliminate the excess emissions.

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

3. If there are no excess emissions during the semiannual period, the permittee shall submit a statement to that effect along with the emissions unit and monitor operating times. These semiannual reports shall be submitted by January 31 and July 31, for the previous 6-month period.

#### **V. Testing Requirements**

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

- 1.a Emission Limitation:

40 parts per million of total reduced sulfur, on a dry basis and as a twelve-hour average, corrected to ten per cent oxygen by volume for lime kilns operated with cold-end temperatures less than of five hundred degrees Fahrenheit or having a length-to-diameter ratio of less than 20:1.

Applicable Compliance Method:

Compliance may be demonstrated based upon the continuous emissions monitoring records kept in accordance with section B.III.1 of these terms and conditions.

If required, compliance shall be demonstrated based upon the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 16 or 16A.

#### **VI. Miscellaneous Requirements**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** No.9 Smelt Dissolving Tank (P005)  
**Activity Description:** Smelt dissolving portion of liquor recovery process

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 9 smelt dissolving tank controlled with a wet scrubber	OAC rule 3745-31-05(A)(3) (PTI 06-5311)	0.1 g of particulate emissions per kg of black liquor solids fired in the recovery boiler  35.2 lbs/hr of particulate emissions (PE)  154.3 tpy of PE  0.0084 g of total reduced sulfur per kg of black liquor solids fired in the recovery boiler  1.19 lbs/hr of total reduced sulfur  5.2 tpy of total reduced sulfur  2.14 lbs/hr of Volatile Organic Compounds (VOC)  9.4 tpy of VOC  3.83 lbs/hr of Sulfur Dioxide (SO <sub>2</sub> )  16.8 tpy of SO <sub>2</sub>  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-11(B), and 40 CFR Part 63, Subpart MM.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average.
	OAC rule 3745-17-11(B)	The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 60, Subpart BB [40 CFR 60.282(a)(2)]	The emission limitation from this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 60, Subpart BB [40 CFR 60.283(a)(4)]	The emission limitation from this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	40 CFR Part 63, Subpart MM [40 CFR 63.862(a)(1)(i)(B)]	0.20 lb of particulate emissions per ton of black liquor solids fired
		See section A.1.2.a below.

**2. Additional Terms and Conditions**

2.a The requirement to comply with this emission limitation shall begin on March 13, 2004.

**II. Operational Restrictions**

1. The minimum pressure drop or pressure drop range across the scrubber, and the minimum scrubber water flow rate shall be determined during the initial performance test that demonstrates that the emission unit is in compliance. That minimum pressure drop or pressure drop range across the scrubbers and minimum scrubber water flow rate shall be continuously maintained at all times while the emissions unit is in operation.
2. By March 13, 2004, the permittee shall revise its Startup, Shutdown and Malfunction Plan to meet the requirements of 40 CFR Part 63.866(a).

**III. Monitoring and/or Record Keeping Requirements**

1. The pressure drop across the scrubber shall be monitored and recorded on a rolling, 3-hour basis. If the pressure drop falls below the pressure drop determined during the initial performance test, then appropriate corrective actions shall be taken. If it is demonstrated during a subsequent performance test, that an adequate pressure drop across the scrubber is a different value, then corrective action shall take place based on this subsequently determined value.
2. The water flow rate to the scrubber shall be monitored and recorded on a rolling, 3-hour basis. If the water flow rate falls below the water flow rate determined during the initial performance test, then appropriate corrective actions shall be taken. If it is demonstrated, by a subsequent performance test, that an adequate water flow rate to the scrubber is a different value, then corrective action shall take place based on this subsequently determined value.
3. The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

4. The permittee shall record the hours of operation of this emissions unit in a log book.
5. [40 CFR Part 63.864(a)]
  - (1) The owner or operator of each affected kraft or soda recovery furnace or lime kiln equipped with an Electro Static Precipitator (ESP) must install, calibrate, maintain, and operate a continuous opacity monitoring system that can be used to determine opacity at least once every successive 10-second period and calculate and record each successive 6-minute average opacity using the procedures in Secs. 63.6(h) and 63.8.
  - (2) The owner or operator of each affected kraft or soda recovery furnace, kraft or soda lime kiln, sulfite combustion unit, or kraft or soda smelt dissolving tank equipped with a wet scrubber must install, calibrate, maintain, and operate a continuous monitoring system that can be used to determine and record the pressure drop across the scrubber and the scrubbing liquid flow rate at least once every successive 15- minute period using the procedures in Sec. 63.8(c), as well as the procedures in paragraphs (i) and (ii) of this section:
    - (i) The monitoring device used for the continuous measurement of the pressure drop of the gas stream across the scrubber must be certified by the manufacturer to the accurate to within a gage pressure of plus or minus 500 pascals (plus or minus 2 inches of water gage pressure); and
    - (ii) The monitoring device used for continuous measurement of the scrubbing liquid flow rate must be certified by the manufacturer to be accurate within plus or minus 5 percent of the design scrubbing liquid flow rate.
  - (3) The owner or operator of each affected semichemical combustion unit equipped with a Regenerative Thermal Oxidizer (RTO) must install, calibrate, maintain, and operate a continuous monitoring system that can be used to determine and record the operating temperature of the RTO at least once every successive 15- minute period using the procedures in Sec. 63.8(c). The monitor must compute and record the operating temperature at the point of incineration of effluent gases that are emitted using a temperature monitor accurate to within plus or minus 1 percent of the temperature being measured.
  - (4) The owner or operator of each affected source or process unit that uses a control device listed in paragraphs (a)(1) through (3) of this section may monitor alternative control device operating parameters subject to prior written approval by the Ohio EPA Southeast District Office.
  - (5) The owner or operator of each affected source or process unit that uses an air pollution control system other than those listed in paragraphs (a)(1) through (3) of this section must monitor the parameters as approved by the Ohio EPA Southeast District Office using the methods and procedures in Sec. 63.865(f).
  - (6) The owner or operator of each affected source or process unit complying with the gaseous organic HAP emissions limitations of Sec. 63.862(c)(1) through the use of an NonDirect Contact Evaporator (NDCE) recovery furnace equipped with a dry ESP system is not required to conduct any performance testing or any continuous monitoring to demonstrate compliance with the gaseous organic HAP emission limitation.
6. [40 CFR Part 63.864(b)]
  - (1) The owner or operator of each affected source or process unit subject to the requirements of this subpart is required to conduct an initial performance test using the test methods and procedures listed in Secs. 63.7 and 63.865, except as provided in paragraph (b)(3) of this section.

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

(2) Determination of operating ranges.

(i) During the initial performance test required in paragraph (b)(1) of this section, the owner or operator of any affected source or process unit must establish operating ranges for the monitoring parameters in paragraphs (a)(2) through (5) of this section, as appropriate; or

(ii) The owner or operator may base operating ranges on values recorded during previous performance tests or conduct additional performance tests for the specific purpose of establishing operating ranges, provided that test data used to establish the operating ranges are or have been obtained using the test methods required in this subpart. The owner or operator of the affected source or process unit must certify that all control techniques and processes have not been modified subsequent to the testing upon which the data used to establish the operating parameter ranges were obtained.

(iii) The owner or operator of an affected source or process unit may establish expanded or replacement operating ranges for the monitoring parameter values listed in paragraphs (a)(2) through (5) of this section and established in paragraph (b)(2)(i) or (ii) of this section during subsequent performance tests using the test methods in Sec. 63.865.

(3) An initial performance test is not required to be conducted in order to determine compliance with the emissions limitations of Sec. 63.862(c)(1) if the affected source or process unit includes an NDCE recovery furnace equipped with a dry ESP system.

(4) After the Ohio EPA Southeast District Office has approved the PE limits for each kraft or soda recovery furnace, smelt dissolving tank, and lime kiln, the owner or operator complying with an overall PE limit established in Sec. 63.862(a)(1)(ii) must demonstrate compliance with the HAP metals standard by demonstrating compliance with the approved PE limits for each affected kraft or soda recovery furnace, smelt dissolving tank, and lime kiln, using the test methods and procedures in Sec. 63.865(b).

#### 7. [40 CFR Part 63.864(c)]

(1) Following the compliance date, owners or operators of all affected sources or process units are required to implement corrective action, as specified in the startup, shutdown, and malfunction plan prepared under Sec. 63.866(a) if the monitoring exceedances in paragraphs (i) through (v) of this section occur:

(i) For a new or existing kraft or soda recovery furnace or lime kiln equipped with an ESP, when the average of ten consecutive 6-minute averages result in a measurement greater than 20 percent opacity;

(ii) For a new or existing kraft or soda recovery furnace, kraft or soda smelt dissolving tank, kraft or soda lime kiln, or sulfite combustion unit equipped with a wet scrubber, when any 3-hour average parameter value is outside the range of values established in paragraph (b)(2) of this section.

(iii) For a new or existing semichemical combustion unit equipped with an RTO, when any 1-hour average temperature falls below the temperature established in paragraph (b)(2) of this section;

(iv) For an affected source or process unit equipped with an alternative emission control system approved by the Administrator, when any 3-hour average value is outside the range of parameter values established in paragraph (b)(2) of this section; and

(v) For an affected source or process unit that is monitoring alternative operating parameters established in paragraph (a)(4) of this section, when any 3-hour average value is outside the range of parameter values established in paragraph (b)(2) of this section.

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

(2) Following the compliance date, owners or operators of all affected sources or process units are in violation of the standards of Sec. 63.862 if the monitoring exceedances in paragraphs (i) through (vi) of this section occur:

(i) For an existing kraft or soda recovery furnace equipped with an ESP, when opacity is greater than 35 percent for 6 percent or more of the operating time within any quarterly period;

(ii) For a new kraft or soda recovery furnace or a new or existing lime kiln equipped with an ESP, when opacity is greater than 20 percent for 6 percent or more of the operating time within any quarterly period;

(iii) For a new or existing kraft or soda recovery furnace, kraft or soda smelt dissolving tank, kraft or soda lime kiln, or sulfite combustion unit equipped with a wet scrubber, when six or more 3-hour average parameter values within any 6-month reporting period are outside the range of values established in paragraph (b)(2) of this section;

(iv) For a new or existing semichemical combustion unit equipped with an RTO, when any 3-hour average temperature falls below the temperature established in paragraph (b)(2) of this section;

(v) For an affected source or process unit equipped with an alternative air pollution control system approved by the Ohio EPA Southeast District Office, when six or more 3-hour average values within any 6-month reporting period are outside the range of parameter values established in paragraph (b)(2) of this section; and

(vi) For an affected source or process unit that is monitoring alternative operating parameters established in paragraph (a)(4) of this section, when six or more 3-hour average values within any 6-month reporting period are outside the range of parameter values established in paragraph (b)(2) of this section.

(3) For purposes of determining the number of nonopacity monitoring exceedances, no more than one exceedance will be attributed in any given 24-hour period.

#### 8. [40 CFR Part 63.866(a)]

Startup, shutdown, and malfunction plan. The owner or operator must develop and implement a written plan as described in Sec. 63.6(e)(3) that contains specific procedures to be followed for operating the source and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and control systems used to comply with the standards. In addition to the information required in Sec. 63.6(e), the plan must include the requirements in paragraphs (a)(1) and (2) of this section.

(1) Procedures for responding to any process parameter level that is inconsistent with the level(s) established under Sec. 63.864(b)(2), including the procedures in paragraphs (i) and (ii) of this section:

(i) Procedures to determine and record the cause of an operating parameter exceedance and the time the exceedance began and ended; and

(ii) Corrective actions to be taken in the event of an operating parameter exceedance, including procedures for recording the actions taken to correct the exceedance.

(2) The startup, shutdown, and malfunction plan also must include the schedules listed in paragraphs (i) and (ii) of this section:

(i) A maintenance schedule for each control technique that is consistent with, but not limited to, the manufacturer's instructions and recommendations for routine and long-term maintenance; and

(ii) An inspection schedule for each continuous monitoring system required under Sec. 63.864 to ensure, at least once in each 24-hour period, that each continuous monitoring system is properly functioning.

#### 9. [40 CFR Part 63.866(b)]

The owner or operator of an affected source or process unit must maintain records of any occurrence when corrective action is required under Sec. 63.864(c)(1), and when a violation is noted under Sec. 63.864(c)(2).

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

10. [40 CFR Part 63.866(c)]  
In addition to the general records required by Sec. 63.10(b)(2), the owner or operator must maintain records of the information in paragraphs (c)(1) through (6) of this section:
- (1) Records of black liquor solids firing rates in units of megagrams/day or tons/day for all recovery furnaces and semichemical combustion units;
  - (2) Records of CaO production rates in units of megagrams/day or tons/day for all lime kilns;
  - (3) Records of parameter monitoring data required under Sec. 63.864, including any period when the operating parameter levels were inconsistent with the levels established during the initial performance test, with a brief explanation of the cause of the deviation, the time the deviation occurred, the time corrective action was initiated and completed, and the corrective action taken;
  - (4) Records and documentation of supporting calculations for compliance determinations made under Secs. 63.865(a) through (e);
  - (5) Records of monitoring parameter ranges established for each affected source or process unit;
  - (6) Records certifying that an NDCE recovery furnace equipped with a dry ESP system is used to comply with the gaseous organic HAP standard in Sec. 63.862(c)(1).

### IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the levels specified in sections A.III.1 and A.III.2 of these terms and conditions:
  - a. the pressure drop across the scrubber; and
  - b. the scrubber water flow rate.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.
3. The permittee shall also submit annual reports that specify the total particulate, total reduced sulfur, volatile organic compounds and sulfur dioxide emissions from the emissions unit for the previous calendar year. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 of each year.
4. [40 CFR Part 63.867]
  - (1) Any owner or operator of a group of process units in a chemical recovery system at a mill complying with the PE limits in Sec. 63.862(a)(1)(ii) must submit the PE limits determined in Sec. 63.865(a) for each affected kraft or soda recovery furnace, smelt dissolving tank, and lime kiln to the Ohio EPA Southeast District Office for approval. The emissions limits must be submitted as part of the notification of compliance status required under subpart A of this part.
  - (2) Any owner or operator of a group of process units in a chemical recovery system at a mill complying with the PE limits in Sec. 63.862(a)(1)(ii) must submit the calculations and supporting documentation used in Sec. 63.865(a)(1) and (2) to the Ohio EPA Southeast District Office as part of the notification of compliance status required under subpart A of this part.

#### **IV. Reporting Requirements (continued)**

(3) After the Ohio EPA Southeast District Office has approved the emissions limits for any process unit, the owner or operator of a process unit must notify the Administrator before any of the actions in paragraphs (b)(3)(i) through (iv) of this section are taken:

(i) The air pollution control system for any process unit is modified or replaced;

(ii) Any kraft or soda recovery furnace, smelt dissolving tank, or lime kiln in a chemical recovery system at a kraft or soda pulp mill complying with the PE limits in Sec. 63.862(a)(1)(ii) is shut down for more than 60 consecutive days;

(iii) A continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit is changed; or

(iv) The black liquor solids firing rate for any kraft or soda recovery furnace during any 24-hour averaging period is increased by more than 10 percent above the level measured during the most recent performance test.

(4) An owner or operator of a group of process units in a chemical recovery system at a mill complying with the PE limits in Sec. 63.862(a)(1)(ii) and seeking to perform the actions in paragraph (b)(3)(i) or (ii) of this section must recalculate the overall PE limit for the group of process units and resubmit the documentation required in paragraph (b)(2) of this section to the Ohio EPA Southeast District Office. All modified PE limits are subject to approval by the Ohio EPA Southeast District Office.

5. (1) When no exceedances of parameters have occurred, the owner or operator must submit a semiannual report stating that no excess emissions occurred during the reporting period.

(2) The owner or operator of an affected source or process unit subject to the requirements of this subpart and subpart S of this part may combine excess emissions and/or summary reports for the mill. [66 FR 3193, Jan. 12, 2001 as amended at 66 FR 16408, Mar. 26, 2001]

[40 CFR Part 63.867(c)]

Excess emissions report. The owner or operator must report quarterly if measured parameters meet any of the conditions specified in paragraph (c)(1) or (2) of Sec. 63.864. This report must contain the information specified in Sec. 63.10(c) of this part as well as the number and duration of occurrences when the source met or exceeded the conditions in Sec. 63.864(c)(1), and the number and duration of occurrences when the source met or exceeded the conditions in Sec. 63.864(c)(2). Reporting excess emissions below the violation thresholds of Sec. 63.864(c) does not constitute a violation of the applicable standard.

#### **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 Limitations:

0.1 g of particulate emissions per kg of black liquor solids fired in the recovery boiler

35.2 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

**V. Testing Requirements (continued)**

**1.b** Emission Limitation:

154.3 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation and dividing by 2000 lbs/ton.

**1.c** Emission Limitations:

0.0084 g of total reduced sulfur per kg of black liquor solids fired in the recovery boiler

1.19 lbs/hr of total reduced sulfur

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

**1.d** Emission Limitation:

5.2 tpy of total reduced sulfur

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation and dividing by 2000 lbs/ton.

**1.e** Emission Limitation:

2.14 lbs/hr of VOC

Applicable Compliance Method:

If required, compliance shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25A.

**1.f** Emission Limitation:

9.4 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation and dividing by 2000 lbs/ton.

**1.g** Emission Limitation:

3.83 lbs/hr of SO<sub>2</sub>

Applicable Compliance Method:

If required, compliance shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

**V. Testing Requirements (continued)**

**1.h** Emission Limitation:

16.8 tpy of SO<sub>2</sub>

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation and dividing by 2000 lbs/ton.

**1.i** Emission Limitation:

0.20 lb of particulate emissions per ton of black liquor solids fired.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2. through 8.

**1.j** Emission Limitation:

20% opacity, as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

**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 approximately 2.5 years after the effective date of this permit, and again within 6 months prior to permit expiration.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates and total reduced sulfur.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emissions rates: for particulates, Methods 1 through 5 of 40 CFR Part 60, Appendix A and OAC rule 3745-17-03(B)(1); for total reduced sulfur, Methods 1 through 4 and 16 or 16A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

d. During the emission testing, the permittee shall determine and record the weight of black liquor solids fired in the associated recovery boiler.

e. The tests shall be conducted while the emissions unit and the associated recovery boiler are operating at or near their maximum capacities, unless otherwise approved in writing by the Ohio EPA Southeast District Office.

## V. Testing Requirements (continued)

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in Ohio EPA's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the tests, 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 emission tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Southeast District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, and obtain prior approval for the additional time from the Ohio EPA Southeast District Office.

3. [40 CFR Part 63.865(a)]  
(a) The owner or operator of a process unit seeking to comply with a PE limit under Sec. 63.862(a)(1)(ii)(A) must use the procedures in paragraphs (a)(1) and (2) of section 63.865.
4. [40 CFR Part 63.865(b)]
  - (1) For purposes of determining the concentration of PE emitted from each kraft or soda recovery furnace, sulfite combustion unit, smelt dissolving tank or lime kiln, Method 5 or 29 in appendix A of 40 CFR part 60 must be used, except that Method 17 in appendix A of 40 CFR part 60 may be used in lieu of Method 5 or Method 29 if a constant value of 0.009 g/dscm (0.004 gr/dscf) is added to the results of Method 17, and the stack temperature is no greater than 205 deg.C (400 deg.F). The sampling time and sample volume for each run must be at least 60 minutes and 0.90 dscm (31.8 dscf). Water must be used as the cleanup solvent instead of acetone in the sample recovery procedure.
  - (2) For sources complying with paragraph (a) or (b) of Sec. 63.862, the PE concentration must be corrected to the appropriate oxygen concentration using Equation 7 of section 63.865(b).
  - (3) Method 3A or 3B in appendix A of 40 CFR part 60 must be used to determine the oxygen concentration. The gas sample must be taken at the same time and at the same traverse points as the particulate sample.
  - (4) For purposes of complying with of Sec. 63.862(a)(1)(ii)(A), the volumetric gas flow rate must be corrected to the appropriate oxygen concentration using Equation 8 of section 63.865(b).
  - (5) For purposes of selecting sampling port location and number of traverse points, determining stack gas velocity and volumetric flow rate, conducting gas analysis, and determining moisture content of stack gas, Methods 1 through 4 in appendix A of 40 CFR part 60 must be used.
  - (6) Process data measured during the performance test must be used to determine the black liquor solids firing rate on a dry basis and the CaO production rate.
5. The Ohio EPA Southeast District Office may request further information and will approve acceptable test methods and procedures. [66 FR 3193, Jan. 12, 2001, as amended at 66 FR 37593, July 19, 2001]

## VI. Miscellaneous Requirements

1. The permittee shall comply with the requirements of 40 CFR Part 63, Subpart MM, National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semicemical Pulp Mills by March 13, 2004.

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 9 smelt dissolving tank controlled with a wet scrubber	OAC rule 3745-73-03(A)(6)	The emission limitation specified in this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

**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:** Bleach Plant Area (P008)  
**Activity Description:** Bleaching of pulp

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Bleach plant area controlled with four wet scrubbers typically operated in series	40 CFR Part 63, Subpart S  OAC rule 3745-31-05(A)(3) (PTI 06-1214)	See A.I.2.a and A.I.2.b below.  The requirements of this rule are less stringent than the requirements established pursuant to 40 CFR Part 63.445.

##### 2. Additional Terms and Conditions

- 2.a The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart A - General Provisions, as specified in 40 CFR Part 63, Subpart S, Table 1.
- 2.b [40 CFR Part 63.445(c)]  
The permittee shall comply with one of the following emission limitations for this emissions unit:
  - i. reduce the total chlorinated HAP entering the scrubbers by a minimum of 99%, by weight; or
  - ii. reduce the scrubber outlet concentrations of total chlorinated HAP to 10 ppm or less by volume; or
  - iii. maintain the outlet mass emission rates of total chlorinated HAP from the scrubbers to less than 0.002 lb per ton of oven dried pulp.

##### II. Operational Restrictions

1. [40 CFR 63.453(c)(1)]  
The required oxidation/reduction potential or minimum pH of the scrubber effluent shall be determined during the initial performance test that demonstrates that the emissions unit is in compliance. The values for oxidation/reduction potential or pH determined during that performance test shall be maintained at all times while the emissions unit is in operation.

## II. Operational Restrictions (continued)

2. [40 CFR 63.453(c)(2)]  
Per 40 CFR Part 63.453(n), the permittee has requested and received permission from U.S. EPA to use an alternative monitoring protocol to replace the requirement to continuously monitor the scrubber inlet gas flow rate. The permittee shall monitor the on/off status of the fan used to convey gases to the bleach plant scrubbers. If this fan is operating during the initial performance test that demonstrates compliance for this emissions unit, the requirements of 40 CFR 63.453(c)(2) shall be met if this fan is operating any time the emissions unit is operating.
3. [40 CFR 63.453(c)(3)]  
The required minimum water flow rate into the scrubbers shall be determined during the initial performance test that demonstrates the emissions unit is in compliance. The water flow rate into the scrubbers shall be continuously monitored and the minimum water flow rate into the scrubbers determined during the initial compliance test shall be maintained at all times while the emissions unit is in operation.
4. [40 CFR 63.445(b)]  
The permittee shall achieve compliance with the requirements of 40 CFR Part 63, Subpart S, in part, by enclosing and venting emissions from this emissions unit to a closed-vent system.
5. [40 CFR 63.450(a)]  
The permittee shall comply with the following requirements for each enclosure and closed-vent system used for capturing and transporting vent streams that contain HAP emissions:
  - 5.a [40 CFR 63.450(c)]  
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 63.457(d).
  - 5.b [40 CFR 63.450(d)]  
Each bypass line in the closed-vent system that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations shall comply with one 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.
    - 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 a 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. For bypass line valves that are computer controlled, valve locations shall be recorded in the computer data retrieval system.
6. [40 CFR 63.446]  
This emissions unit is subject to the Condensate Collection and Treatment System requirements of section A.5 of the Specific Facility Terms and Conditions of this permit

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to continuously monitor the scrubber water flow rate and the oxidation/reduction potential or pH of the scrubber effluents while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
2. As an alternative monitoring protocol approved by U.S. EPA in a letter dated August 3, 2001, the permittee shall monitor and record in an operating log the on/off status of the fan used to convey gases to the bleach plant scrubbers once per each eight-hour period while the emissions unit is operating.

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

3. The water flow rate to the scrubbers shall be monitored and recorded on a rolling, 3-hour basis. If any water flow rate falls below the water flow rate determined in accordance with section A.II.3 above, then appropriate corrective actions shall be pursued.
4. The oxidation/reduction potential or pH of the scrubber effluents shall be monitored and recorded on a rolling, 3-hour basis. If the oxidation/reduction potential or pH of any scrubber effluent falls outside the values for the range of oxidation/reduction potential or pH of the scrubber effluents determined in accordance with section A.II.1 above, then appropriate corrective actions shall be pursued.
5. [40 CFR 63.453(k)(1)-(5)]  
The permittee shall conduct the following for each enclosure and closed-vent system required by section A.II.4 of these terms and conditions.
  - a. For each enclosure opening, a visual inspection of the closure mechanism 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 Ohio EPA Southeast District Office. 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, the permittee shall demonstrate that there are no detectable leaks, as specified in 40 CFR Part 63.450(c), and measured initially and annually by procedures in accordance with 40 CFR 63.457(d).
  - d. Demonstrate initially and annually that each enclosure opening is maintained at negative pressure.
  - e. The valve or closure mechanism 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.
6. [40 CFR 63.453(k)(6)]  
If an inspection required by section A.III.5 above identifies visible defects in ductwork, piping, enclosures or connections to covers, or if a leak, as specified in 40 CFR Part 63.450(c), is detected or if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable:
  - a. The permittee shall make a first effort to repair or correct the closed-vent system as soon as practicable but no later than 5 calendar days after the problem is identified.
  - b. The permittee shall repair or take other corrective action no later than 15 calendar days after the problem is identified.
  - c. Delay of repair or corrective action is allowed if the repair or corrective action is technically infeasible without a process unit shutdown or if the owner or operator determines that the emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed by the end of the next process unit shutdown.

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

7. [40 CFR 63.454(b)]  
The permittee shall prepare and maintain a site-specific inspection plan including a drawing or schematic of the components of applicable affected equipment for each applicable enclosure opening, closed-vent system, and closed collection system and shall record 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; and
  - l. the duration of the use of bypass valves on computer controlled valves.

### **IV. Reporting Requirements**

1. The permittee shall comply with all applicable reporting requirements in 40 CFR Part 63, Subpart A, as specified in 40 CFR Part 63, Subpart S, Table 1.
2. The permittee shall meet the requirements specified in section A.IV.1 of these terms and conditions upon startup of any new affected process equipment or pulping process condensate stream that becomes subject to the standards of 40 CFR Part 63, Subpart S due to a process change or modification.

### **V. Testing Requirements**

1. 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 within 3 months of the effective date of this permit, and within 6 months of permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with one of the emission limitations specified in section A.I.2.b of these terms and conditions.
  - c. Compliance with the emission limitation in section A.I.2.b of these terms and conditions shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 26A as modified per 40 CFR 63.457(b)(5)(ii). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.
  - d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Southeast District Office.

## **V. Testing Requirements (continued)**

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in Ohio EPA's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the tests, 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 emission tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Southeast District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, and obtain prior approval for the additional time from the Ohio EPA Southeast District Office.

2. Compliance with the requirements of 40 CFR Part 63.445(c)(1) or (2) shall be demonstrated by the use of a continuous monitoring system to monitor the oxidation/reduction potential or pH of the scrubber effluent and the scrubber liquid influent flow rate. The fan used to convey gases to the bleach plant scrubbers must be operating as specified in U.S. EPA's letter dated August 3, 2001 granting an Alternative Monitoring Protocol.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Digester Area (P014)  
**Activity Description:** Wood chip cooking process

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
kraft pulp mill digester system controlled with a thermal oxidizer and wet scrubber	40 CFR Part 63, Subpart S	See A.I.2.a and A.I.2.b below.
	OAC rule 3745-31-05(A)(3) (PTI 06-3177)	The requirements of this rule are less stringent than the emission limitations established by 40 CFR Part 63, Subpart S.

##### 2. Additional Terms and Conditions

- 2.a [40 CFR 63.440(g)]  
The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart A - General Provisions, as specified in 40 CFR Part 63, Subpart S, Table 1.
- 2.b [40 CFR 63.443(d)]  
The permittee shall route emissions from the closed-vent system required in section A.II.2 below to a control device that:
  - i. reduces total HAP emissions by 98% or more, by weight; or
  - ii. reduces the total HAP concentration at the outlet of the thermal oxidizer to 20 ppm or less, by volume, corrected to 10% oxygen on a dry basis; or
  - iii. reduces total HAP emissions using a thermal oxidizer designed and operated at a minimum temperature of 1600 degrees Fahrenheit and a minimum residence time of 0.75 second; or
  - iv. reduces total HAP emissions using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone; or
  - v. reduces total HAP emissions using a boiler or recovery furnace with a heat input capacity greater than or equal to 150 mmBtu/hr by introducing the HAP emission stream with the combustion air.

## II. Operational Restrictions

1. [40 CFR 63.445(b)]  
The permittee shall achieve compliance with the requirements of 40 CFR Part 63, Subpart S, in part, by enclosing and venting emissions from this emissions unit to a closed-vent system.
2. [40 CFR 63.443(c)]  
The permittee shall operate the selected control device in section A.I.2.b above in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored under section A.III of these terms and conditions and established under 40 CFR Part 63, Subpart S.  
  
The operation of the control device below minimum operating parameter values or above maximum operating parameter values established under 40 CFR Part 63, Subpart S or failure to perform procedures required by this Subpart shall constitute a violation of the applicable emission standard and be reported as a period of excess emissions.
3. [40 CFR 63.450(a)]  
The permittee shall comply with the following requirements for each enclosure and closed-vent system used for capturing and transporting vent streams that contain HAP emissions:
4. [40 CFR 63.450(c)]  
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 63.457(d).
5. [40 CFR 63.446]  
This emissions unit is subject to the Condensate Collection and Treatment System requirements of section A.5 of the Specific Facility Terms and Conditions of this permit

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall comply with the applicable monitoring requirements in 40 CFR Part 63, Subpart A as specified in 40 CFR Part 63, Subpart S, Table 1.
2. The permittee shall record the continuous monitoring system parameters specified in 40 CFR Part 63.453 (see section A.III.5 below) and meet the requirements of section A.III.1 of these terms and conditions for any new affected process equipment or pulping process condensate stream that becomes subject to the standards of 40 CFR Part 63, Subpart S due to a process change or modification.
3. The permittee using a control device, technique, or an alternative parameter other than those specified in 40 CFR Part 63.453 shall install a continuous monitoring system and establish appropriate operating parameters to be monitored that demonstrate continuous compliance with the applicable control requirements to the Ohio EPA Southeast District Office.
4. To establish or reestablish, the value for each operating parameter required to be monitored in sections A.III.1 and A.III.2 above, the permittee shall use the following procedures:
  - a. during the initial performance test or any subsequent performance test, continuously record the operating parameters;
  - b. determinations shall be based on the control performance and parameter data monitored during the performance test, supplemented, if necessary, by engineering assessments and the manufacturer's recommendations;
  - c. include all data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the applicable emission standard.

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

5. [40 CFR 63.453]

The permittee shall conduct the following for each closed-vent system required by section A.II.1 above.

- a. For each enclosure opening, a visual inspection of the closure mechanism 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 Ohio EPA Southeast District Office. 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, the permittee shall demonstrate that there are no detectable leaks, as specified in 40 CFR Part 63.450(c) and measured initially and annually by procedures in accordance with 40 CFR 63.457(d).
- d. Demonstrate initially and annually that each enclosure opening is maintained at negative pressure.
- e. The valve or closure mechanism 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.

6. [40 CFR 63.453(k)(6)]

If an inspection required by section A.III.5 above identifies visible defects in ductwork, piping, enclosures or connections to covers, or if a leak, as specified in 40 CFR Part 63.450(c), is detected or if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable:

- a. The permittee shall make a first effort to repair or correct the closed-vent system as soon as practicable but no later than 5 calendar days after the problem is identified.
- b. The permittee shall repair or take other corrective action no later than 15 calendar days after the problem is identified.
- c. Delay of repair or corrective action is allowed if the repair or corrective action is technically infeasible without a process unit shutdown or if the owner or operator determines that the emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed by the end of the next process unit shutdown.

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

**7. [40 CFR 63.454(b)]**

The permittee shall prepare and maintain a site-specific inspection plan including a drawing or schematic of the components of applicable affected equipment for each applicable enclosure opening, closed-vent system, and closed collection system and shall record 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; and
- l. the duration of the use of bypass valves on computer controlled valves.

### **IV. Reporting Requirements**

1. The permittee shall comply with all reporting requirements in 40 CFR Part 63, Subpart A, as specified in 40 CFR Part 63, Subpart S, Table 1.
2. [40 CFR 63.455]  
The permittee shall meet the requirements specified in section A.IV.1 above upon startup of any new affected process equipment or pulping process condensate stream that becomes subject to the standards of 40 CFR Part 63, Subpart S due to a process change or modification.

### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.2.b of these terms and conditions shall be determined in accordance with the methods in 40 CFR Part 63.457. The methods required depend on the control option selected from the options given in section A.I.2.b of these terms and conditions.

## **V. Testing Requirements (continued)**

2. Unless controlled by a control device listed in section A.1.2.b.iii or A.1.2.b.iv above, the permittee shall conduct emission testing for this emissions unit in accordance with the following requirements:
  - a. the emission testing shall be conducted within 3 months of the effective date of this permit, and within 6 months of permit expiration;
  - b. the emission testing shall be conducted to demonstrate compliance with the HAP emission limitation specified in sections A.1.2.b.i and A.1.2.b.ii above;
  - c. test methods and procedures identified in 40 CFR Part 63.457 and 40 CFR Part 63.7 shall be employed to demonstrate compliance with the HAP emission limitation; and
  - d. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise approved by the Ohio EPA Southeast District Office.
3. Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in Ohio EPA's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the tests, 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 emission tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Southeast District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, and obtain prior approval for the additional time from the Ohio EPA District Office.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
kraft pulp mill digester system controlled with a thermal oxidizer and wet scrubber	OAC rule 3745-73-03(A)(2)	The requirements of this rule are less stringent than the emission limitations established by 40 CFR Part 63, Subpart S.

**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:** Chemiwasher Area (P015)

**Activity Description:** Brown stock washing

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
kraft pulp mill brown stock washing system controlled using either B013 or B002	40 CFR Part 60, Subpart BB [40 CFR 60.283(a)(1)(iii)]	5 ppmv of total reduced sulfur, corrected to 10% oxygen (O <sub>2</sub> ) on a dry basis  (Not applicable if gases are combusted in a recovery furnace subject to the provisions of 40 CFR Part 60, Subpart BB.)
	OAC rule 3745-31-05(A)(3) (PTI 06-3177)	The requirements of this rule are less stringent than the requirements established by 40 CFR 60.283(a)(1)(iii).
	40 CFR Part 63, Subpart S	See A.I.2.a and A.I.2.b below.

##### 2. Additional Terms and Conditions

- 2.a [40 CFR 63.440(g)]  
 The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart A - General Provisions, as specified in 40 CFR Part 63, Subpart S, Table 1.

## 2. Additional Terms and Conditions (continued)

### 2.b [40 CFR 63.443(d)]

The permittee shall route emissions from the closed-vent system required in section A.II.2 below to a control device that:

- i. reduces total HAP emissions by 98% or more, by weight; or
- ii. reduces the total HAP concentration at the outlet of the thermal oxidizer to 20 ppm or less, by volume, corrected to 10% oxygen on a dry basis; or
- iii. reduces total HAP emissions using a thermal oxidizer designed and operated at a minimum temperature of 1600 degrees Fahrenheit and a minimum residence time of 0.75 second; or
- iv. reduces total HAP emissions using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone; or
- v. reduces total HAP emissions using a boiler or recovery furnace with a heat input capacity greater than or equal to 150 mmBtu/hr by introducing the HAP emission stream with the combustion air.

## II. Operational Restrictions

### 1. [40 CFR 63.445(b)]

The permittee shall achieve compliance with the requirements of 40 CFR Part 63, Subpart S, in part, by enclosing and venting emissions from this emissions unit to a closed-vent system.

2. The permittee shall operate the selected control device in section A.I.2.b of these terms and conditions in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored under section A.III of these terms and conditions and established under 40 CFR Part 63, Subpart S.

The permittee shall monitor the valve position to demonstrate gases are flowing to either the No. 6 or No. 7 Boilers. The operation of the control device below minimum operating parameter values or above maximum operating parameter values established under 40 CFR Part 63, Subpart S or failure to perform procedures required by this permit shall constitute a violation of the applicable emission standard and be reported as a period of excess emissions.

### 3. [40 CFR 63.450(a)]

The permittee shall comply with the following requirements for each enclosure and closed-vent system used for capturing and transporting vent streams that contain HAP emissions:

### 3.a [40 CFR 63.450(c)]

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 63.457(d).

## II. Operational Restrictions (continued)

### 3.b [40 CFR 63.450(d)]

Each bypass line in the closed-vent system that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations shall comply with one 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.

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 a 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. For bypass line valves that are computer controlled, valve locations shall be recorded in the computer data retrieval system.

### 4. [40 CFR 63.446]

This emissions unit is subject to the Condensate Collection and Treatment System requirements of section A.5 of the Specific Facility Terms and Conditions of this permit

## III. Monitoring and/or Record Keeping Requirements

### 1. [40 CFR 63.453(k)(1)-(5)]

The permittee shall conduct the following for each enclosure and closed-vent system in this emissions unit.

**1.a** For each enclosure opening, a visual inspection of the closure mechanism shall be performed at least once every 30 days to ensure the opening is maintained in the closed position and sealed.

**1.b** Each closed-vent system shall be visually inspected every 30 days and at other times as requested by the Ohio EPA Southeast District Office. The visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects.

**1.c** For positive pressure closed-vent systems or portions of closed-vent systems, the permittee shall demonstrate that there are no detectable leaks, as specified in 40 CFR Part 63.450(c) and measured initially and annually by procedures in accordance with 40 CFR 63.457(d).

**1.d** Demonstrate initially and annually that each enclosure opening is maintained at negative pressure.

**1.e** The valve or closure mechanism 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.

### 2. [40 CFR 63.453(k)(6)]

If an inspection required by section A.III.1 above identifies visible defects in ductwork, piping, enclosures or connections to covers, or if a leak, as specified in 40 CFR Part 63.450(c), is detected or if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable:

**2.a** The permittee shall make a first effort to repair or correct the closed-vent system as soon as practicable but no later than 5 calendar days after the problem is identified.

**2.b** The permittee shall repair or take other corrective action no later than 15 calendar days after the problem is identified.

**2.c** Delay of repair or corrective action is allowed if the repair or corrective action is technically infeasible without a process unit shutdown or if the owner or operator determines that the emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed by the end of the next process unit shutdown.

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

**3.** [40 CFR 63.454(b)]

The permittee shall prepare and maintain a site-specific inspection plan including a drawing or schematic of the components of applicable affected equipment for each applicable enclosure opening, closed-vent system, and closed collection system and shall record 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; and
- l. the duration of the use of bypass valves on computer controlled valves.

### **IV. Reporting Requirements**

1. The permittee shall comply with all reporting requirements in 40 CFR Part 63, Subpart A, as specified in 40 CFR Part 63, Subpart S, Table 1.
2. The permittee shall meet the requirements specified in section A.IV.1 of this permit upon startup of any new affected process equipment or pulping process condensate stream that becomes subject to the standards of 40 CFR Part 63, Subpart S due to a process change or modification.

### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.2.b of these terms and conditions shall be determined in accordance with the methods specified in 40 CFR Part 63.457. The methods required depend on the control option selected from the options given in section A.I.2.b of these terms and conditions.

## **V. Testing Requirements (continued)**

2. If the permittee uses a control device listed in section A.1.2.b.i or A.1.2.b.ii of these terms and conditions, the permittee shall conduct emission testing for this emissions unit in accordance with the following requirements:
  - a. the emission testing shall be conducted within 6 months of permit expiration;
  - b. the emission testing shall be conducted to demonstrate compliance with the HAP emission limitation specified in 40 CFR Part 63.445;
  - c. test methods and procedures identified in 40 CFR Part 63.457 and 40 CFR Part 63.7 shall be employed to demonstrate compliance with the HAP emission limitation; and
  - d. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise approved by the Ohio EPA Southeast District Office.
3. Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in Ohio EPA's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the tests, 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 emission tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Southeast District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, and obtain prior approval for the additional time from the Ohio EPA Southeast District Office.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Evaporator System (P016)  
**Activity Description:** Concentration of black liquor for firing in recovery furnace

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
kraft pulp mill multiple effect evaporators and concentrators controlled with a thermal oxidizer	40 CFR Part 63, Subpart S [40 CFR 63.443(d)(2)]	The thermal oxidizer outlet methanol concentration shall be equal to or less than 20 ppmv, corrected to 10% oxygen.
	OAC rule 3745-31-05(A)(3) (PTI 06-3177)	See sections A.I.2.a and A.I.2.b below.  The requirements of this rule are less stringent than the emission limitations established by 40 CFR Part 63, Subpart S.
	40 CFR Part 63, Subpart MM	See section A.I.2.c below.

##### 2. Additional Terms and Conditions

- 2.a [40 CFR 63.440(g)]  
The permittee shall comply with the applicable requirements of 40 CFR Part 63, Subpart A - General Provisions, as specified in 40 CFR Part 63, Subpart S, Table 1.

## **2. Additional Terms and Conditions (continued)**

### **2.b** [40 CFR 63.443(d)]

The permittee shall route emissions from the closed-vent system required in section A.II.2 below to a control device that:

- i. reduces total HAP emissions by 98% or more, by weight; or
- ii. reduces the total HAP concentration at the outlet of the thermal oxidizer to 20 ppm or less, by volume, corrected to 10% oxygen on a dry basis; or
- iii. reduces total HAP emissions using a thermal oxidizer designed and operated at a minimum temperature of 1600 degrees Fahrenheit and a minimum residence time of 0.75 second; or
- iv. reduces total HAP emissions using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone; or
- v. reduces total HAP emissions using a boiler or recovery furnace with a heat input capacity greater than or equal to 150 mmBtu/hr by introducing the HAP emission stream with the combustion air.

### **2.c** The requirements of this rule are equivalent to the requirements of 40 CFR Part 63, Subpart S.

## **II. Operational Restrictions**

### **1.** [40 CFR 63.445(b)]

The permittee shall achieve compliance with the requirements of 40 CFR Part 63, Subpart S, in part, by enclosing and venting emissions from this emissions unit to a closed-vent system.

### **2.** The permittee shall operate the selected control device in section A.I.2.b above in a manner consistent with the minimum or maximum (as appropriate) operating parameter value or procedure required to be monitored under section A.III of these terms and conditions and established under 40 CFR Part 63, Subpart S.

The operation of the control device below minimum operating parameter values or above maximum operating parameter values established under 40 CFR Part 63, Subpart S or failure to perform procedures required by this Subpart shall constitute a violation of the applicable emission standard and be reported as a period of excess emissions.

### **3.** [40 CFR 63.450(a)]

The permittee shall comply with the following requirements for each enclosure and closed-vent system used for capturing and transporting vent streams that contain HAP emissions:

#### **3.a** [40 CFR 63.450(c)]

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 63.457(d).

## II. Operational Restrictions (continued)

### 3.b [40 CFR 63.450(d)]

Each bypass line in the closed-vent system that could divert vent streams containing HAP to the atmosphere without meeting the emission limitations shall comply with one 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.

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 a 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. For bypass line valves that are computer controlled, valve locations shall be recorded in the computer data retrieval system.

### 4. [40 CFR 63.446]

This emissions unit is subject to the Condensate Collection and Treatment System requirements of section A.5 of the Specific Facility Terms and Conditions of this permit

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall record the continuous monitoring system parameters specified in 40 CFR Part 63.453 (see section A.III.2) and meet the requirements of this section A.III of these terms and conditions for any new affected process equipment or pulping process condensate stream that becomes subject to the standards of 40 CFR Part 63, Subpart S due to a process change or modification.
2. The permittee using a control device, technique, or an alternative parameter other than those specified in 40 CFR Part 63.453 shall install a continuous monitoring system and establish appropriate operating parameters to be monitored that demonstrate continuous compliance with the applicable control requirements to the appropriate Ohio EPA Southeast District Office.
3. To establish or reestablish, the value for each operating parameter required to be monitored in section A.III.2 above, the permittee shall use the following procedures:
  - a. during the initial performance test or any subsequent performance test, continuously record the operating parameters;
  - b. determinations shall be based on the control performance and parameter data monitored during the performance test, supplemented, if necessary, by engineering assessments and the manufacturer's recommendations;
  - c. the permittee shall provide, for the Director's approval, the rationale for selecting the monitoring and operating parameters necessary to comply with section A.III.2 above; and
  - d. include all data and calculations used to develop the value and a description of why the value, monitoring frequency, and averaging time demonstrate continuous compliance with the applicable emission standard.
4. The permittee shall conduct the following for each closed-vent system required by section A.II.1 above.
  - 4.a For each enclosure opening, a visual inspection of the closure mechanism shall be performed at least once every 30 days to ensure the opening is maintained in the closed position and sealed.
  - 4.b Each closed-vent system shall be visually inspected every 30 days and at other times as requested by the Ohio EPA Southeast District Office. The visual inspection shall include inspection of ductwork, piping, enclosures, and connections to covers for visible evidence of defects.

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

- 4.c** For positive pressure closed-vent systems or portions of closed-vent systems, the permittee shall demonstrate that there are no detectable leaks, as specified in 40 CFR Part 63.450(c) and measured initially and annually by procedures in accordance with 40 CFR 63.457(d).
- 4.d** Demonstrate initially and annually that each enclosure opening is maintained at negative pressure.
- 4.e** The valve or closure mechanism 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.
- 5.** [40 CFR 63.453(k)(6)]  
If an inspection required by section A.III.4 above identifies visible defects in ductwork, piping, enclosures or connections to covers, or if a leak, as specified in 40 CFR Part 63.450(c), is detected or if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable:
- 5.a** The permittee shall make a first effort to repair or correct the closed-vent system as soon as practicable but no later than 5 calendar days after the problem is identified.
- 5.b** The permittee shall repair or take other corrective action no later than 15 calendar days after the problem is identified.
- 5.c** Delay of repair or corrective action is allowed if the repair or corrective action is technically infeasible without a process unit shutdown or if the owner or operator determines that the emissions resulting from immediate repair would be greater than the emissions likely to result from delay of repair. Repair of such equipment shall be completed by the end of the next process unit shutdown.
- 6.** [40 CFR 63.454(b)]  
The permittee shall prepare and maintain a site-specific inspection plan including a drawing or schematic of the components of applicable affected equipment for each applicable enclosure opening, closed-vent system, and closed collection system and shall record 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; and
  - l. the duration of the use of bypass valves on computer controlled valves.

#### **IV. Reporting Requirements**

1. The permittee shall comply with all reporting requirements in 40 CFR Part 63, Subpart A, as specified in 40 CFR Part 63, Subpart S, Table 1.
2. The permittee shall meet the requirements specified in section A.IV.1 above upon startup of any new affected process equipment or pulping process condensate stream that becomes subject to the standards of 40 CFR Part 63, Subpart S due to a process change or modification.
3. If the permittee uses a thermal oxidizer to control HAP emissions from this emissions unit, the permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average combustion temperature within the thermal oxidizer does not comply with the temperature limitation determined under section A.II.2 above. These reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

#### **V. Testing Requirements**

1. Compliance with the emission limitations in section A.I.2.b of these terms and conditions shall be determined in accordance with the methods in 40 CFR Part 63.457. The methods required depend on the control option selected from the options given in section A.I.2.b of these terms and conditions.
2. Unless controlled by a control device listed in section A.I.2.b.iii, A.I.2.b.iv or A.I.2.b.v above, the permittee shall conduct emission testing for this emissions unit in accordance with the following requirements:
  - a. the emission testing shall be conducted within 6 months of permit expiration;
  - b. the emission testing shall be conducted to demonstrate compliance with the HAP emission limitation specified in sections A.I.2.b.i and A.I.2.b.ii above;
  - c. test methods and procedures identified in 40 CFR Part 63.457 and 40 CFR Part 63.7 shall be employed to demonstrate compliance with the HAP emission limitation; and
  - d. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise approved by the Ohio EPA Southeast District Office.
3. Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in Ohio EPA's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the tests, 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 emission tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Southeast District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, and obtain prior approval for the additional time from the Ohio EPA Southeast District Office.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
kraft pulp mill digester system controlled with a thermal oxidizer and wet scrubber	OAC rule 3745-73-03(A)(2)	The requirements of this rule are less stringent than the emission limitations established by 40 CFR Part 63, Subpart S.

**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:** Chlorine Dioxide Plant (P017)  
**Activity Description:** Production of ClO<sub>2</sub> for bleaching

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
chlorine dioxide plant controlled with two wet scrubbers typically operated in series	OAC rule 3745-31-05(A)(3) (PTI 06-3284)	4.5 lbs/hr of chlorine  0.68 lb/hr of chlorine dioxide

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

- The minimum pressure drop or pressure drop range across the scrubber, and the minimum scrubber water flow rate shall be determined during the initial performance test that demonstrates that the emission unit is in compliance. That minimum pressure drop or pressure drop range across the scrubbers and minimum scrubber water flow rate shall be continuously maintained at all times while the emissions unit is in operation.

##### III. Monitoring and/or Record Keeping Requirements

- The permittee shall operate and maintain 2 chlorine monitors inside the chlorine dioxide plant and 1 chlorine monitor outside the chlorine dioxide plant for the detection of leaks from the chlorine dioxide plant. Audible alarms for the monitors shall be installed at the chlorine dioxide building and in the central control room.
- The pressure drop across the scrubbers shall be monitored on a rolling, 3-hour basis. If the pressure drop falls below the value determined during the initial performance test, then appropriate corrective actions shall be taken. If it is demonstrated, by a subsequent performance test, that an adequate pressure drop across the scrubbers is a different value, then corrective action shall take place based on this subsequently determined value.
- The water flow rate to the scrubber shall be monitored on a rolling, 3-hour basis. If the water flow rate falls below the value determined during the initial performance test, then appropriate corrective actions shall be taken. If it is demonstrated, by a subsequent performance test, that an adequate pressure drop across the scrubbers is a different value, then corrective action shall take place based on the subsequently determined value.
- The permittee shall properly operate and maintain equipment to continuously monitor the pressure drop across the scrubbers and the scrubber water flow rates while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

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

5. The permittee shall collect and record the following information:
  - a. the pressure drop across the scrubbers, in inches of water;
  - b. the scrubber water flow rates, in gallons per minute; and
  - c. the downtime for the capture (collection) system, control device, and monitoring equipment when the associated emissions unit was in operation.

### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
  - a. the static pressure drop across the scrubbers; and
  - b. the scrubber water flow rates.
2. The quarterly deviation (excursion) reports shall be submitted in accordance with section A.1.c.ii 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 Limitations:

4.5 lbs/hr of chlorine

0.68 lb/hr of chlorine dioxide

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

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 approximately 2.5 years after the effective date of this permit and again within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for chlorine and chlorine dioxide in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A Methods 1 through 4 and 26A as modified by 40 CFR 63.457(b)(5)(ii). Alternative approved test methods may be used with prior approval from the Ohio EPA Southeast District Office.
  - c. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise approved in writing by the Ohio EPA Southeast District Office.

## **V. Testing Requirements (continued)**

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in Ohio EPA's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the tests, 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 emission tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Southeast District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, and obtain prior approval for the additional time from the Ohio EPA Southeast District Office.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** No.21 Paper Machine (P320)

**Activity Description:** Paper machine blend chest, cleaners, screens, presses, and dryers.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 21 paper machine	none	See A.I.2.a below.

**2. Additional Terms and Conditions**

- 2.a This emissions unit is an existing stationary source (installed in 1926) located at a facility which is not in a "Priority 1" county as specified in OAC rule 3745-21-06(A). Therefore, the requirements of OAC rule 3745-21-07 do not apply to this emissions unit.

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** No.22 Paper Machine (P325)

**Activity Description:** Paper machine blend chest, cleaners, screens, presses, and dryers.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 22 paper machine	none	See A.I.2.a below.

**2. Additional Terms and Conditions**

- 2.a This emissions unit is an existing stationary source (installed in 1926) located at a facility which is not in a "Priority 1" county as specified in OAC rule 3745-21-06(A). Therefore, the requirements of OAC rule 3745-21-07 do not apply to this emissions unit.

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** No.23 Paper Machine (P330)

**Activity Description:** Paper machine blend chest, cleaners, screens, presses, and dryers.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 23 paper machine	none	See A.1.2.a below.

**2. Additional Terms and Conditions**

- 2.a This emissions unit is an existing stationary source (installed in 1948) located at a facility which is not in a "Priority 1" county as specified in OAC rule 3745-21-06(A). Therefore, the requirements of OAC rule 3745-21-07 do not apply to this emissions unit.

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** No.24 Paper Machine (P335)

**Activity Description:** Paper machine blend chest, cleaners, screens, presses, and dryers.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 24 paper machine	none	See section A.1.2.a below.

**2. Additional Terms and Conditions**

- 2.a This emissions unit is an existing stationary source (installed in 1957) located at a facility which is not in a "Priority 1" county as specified in OAC rule 3745-21-06(A). Therefore, the requirements of OAC rule 3745-21-07 do not apply to this emissions unit.

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** No.32 Coater (P350)  
**Activity Description:** Paper machine 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 32 off-machine coating operation	OAC rule 3745-21-09(F)	2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents

**2. Additional Terms and Conditions**

None

**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; and
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

**IV. Reporting Requirements**

1. The permittee shall notify the Director (the Ohio EPA Southeast District Office) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Southeast District Office) within 30 days following the end of the calendar month.

**V. Testing Requirements**

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents

Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1 of these terms and conditions. Formulation data or the procedures specified in 40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC content of coatings.

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** No.10 Paper Machine (P400)  
**Activity Description:** Paper machine blend chest, screens, and presses.

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 10 paper machine	none	See A.I.2.a below.

**2. Additional Terms and Conditions**

- 2.a This emissions unit is an existing stationary source (installed in 1929) located at a facility which is not in a "Priority 1" county as specified in OAC rule 3745-21-06(A). Therefore, the requirements of OAC rule 3745-21-07 do not apply to this emissions unit.

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** No. 10 Paper Machine Billblade Coater (P401)

**Activity Description:** On-machine coating operation

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 10 paper machine billblade coater	OAC rule 3745-31-05(A)(3) (PTI 06-06693)	8.82 lbs/hr of VOC
	OAC rule 3745-21-09(F)	38.6 tpy of VOC 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

##### 2. Additional Terms and Conditions

None

##### II. Operational Restrictions

None

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information for each month for the coating operation:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the organic compound content of each coating and cleanup material, in pounds per gallon;
  - d. the total VOC emissions for all coating and cleanup material employed, in pounds;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (e)/(d), in pounds per hour (average).

The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

#### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each month during which the average hourly total organic emissions exceeded 8.82 lbs/hr, and the actual average hourly organic compound emissions for each such month. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports that specify the total volatile organic compound emissions from the emissions unit for the previous calendar year. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 of each year.
3. The permittee shall notify the Director (the Ohio EPA Southeast District Office) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Southeast District Office) within 30 days following the end of the calendar month.

#### **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:

8.82 lbs/hr of VOC

Compliance Method:

Compliance may be demonstrated based upon the record keeping requirements specified in section A.III.1 of these terms and conditions. Formulation data or the procedures specified in 40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC contents of the coatings and clean up material.

If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

**1.b** Emission Limitation:

38.6 tpy of VOC

Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation for this emissions unit and dividing by 2000 lbs/ton.

**1.c** Emission Limitation:

2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents

Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1 of these terms and conditions. Formulation data or the procedures specified in 40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC content of coatings.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** No.12 Paper Machine (P500)  
**Activity Description:** Paper machine blend chest, presses, and dryers.

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 12 paper machine	OAC rule 3745-31-05(A)(3) (PTI 06-06470)	11.64 tpy of volatile organic compounds (VOC) related to the modification to increase production speed  57.08 tpy of VOC, total

##### 2. Additional Terms and Conditions

- 2.a This emissions unit is a stationary source located at a facility which is not in a "Priority 1" county as specified in OAC rule 3745-21-06(A). Therefore, the requirements specified in OAC rule 3745-21-07 do not apply to this emissions unit.

##### 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; and
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

##### IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Southeast District Office) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Southeast District Office) within 30 days following the end of the calendar month.

## 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 Limitations:

11.64 tpy of VOC related to the modification to increase production speed

57.08 tpy of VOC, total

Applicable Compliance Method:

Compliance with these emission limitations is demonstrated by a one time calculation using the emission factor of 0.395 lb of VOC per ton of paper produced, determined in performance tests conducted in 1995 and 1996. With the changes covered by PTI 06-06470, the maximum paper production rate for this emissions unit was increased from 640.7 tons/day to 791.8 tons/day.

Maximum VOC emissions due to the incremental production increase are less than 11.64 tpy as shown by the following calculation:

$$(791.8 \text{ tpd} - 640.7 \text{ tpd}) \times (0.395 \text{ lb VOC/ton}) \times (365 \text{ days/yr}) / (2000 \text{ lbs/ton}) = 10.89 \text{ tpy of VOC}$$

Total VOC emissions from the emissions unit, at its increased production rate, are shown by the following calculation:

$$(791.8 \text{ tpd}) \times (0.395 \text{ lb VOC/ton}) \times (365 \text{ days/yr}) / (2000 \text{ lbs/ton}) = 57.08 \text{ tpy of VOC}$$

## VI. Miscellaneous Requirements

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** No.12 Paper Machine Additive/Starch System (P510)

**Activity Description:** Paper machine starch processing

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 12 paper machine additive/starch system	none	See section A.1.2.a below.

**2. Additional Terms and Conditions**

- 2.a This emissions unit is an existing stationary source located at a facility which is not in a "Priority 1" county as specified in OAC rule 3745-21-06(A). Therefore, the requirements of OAC rule 3745-21-07 do not apply to this emissions unit.

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** No.10 Coater (P630)  
**Activity Description:** Paper coating operation

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 10 Paper Coating Operation.	OAC rule 3745-21-09(F)	2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents

##### 2. Additional Terms and Conditions

None

##### 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; and
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

##### IV. Reporting Requirements

1. The permittee shall notify the Director (the Ohio EPA Southeast District Office) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Southeast District Office) within 30 days following the end of the calendar month.

##### V. Testing Requirements

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance may be demonstrated based upon the record keeping requirements specified in section A.III.1 of these terms and conditions. Formulation data or the procedures specified in 40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC contents of the coatings.

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** No.11 Coater (P650)  
**Activity Description:** Paper coating operation

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 11 coater	OAC rule 3745-21-09(F)	2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents

##### 2. Additional Terms and Conditions

None

##### 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; and
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied.

This information does not have to be kept on a line-by-line basis, unless one or more of the lines is a new emissions unit and subject to specific "gallons/year" and "tons/year" limitations, or just a "tons/year" limitation in a Permit to Install. In such cases, for each such new emissions unit only, the above-mentioned information must be maintained separately for that line. Also, if the permittee mixes complying coatings at a line, it is not necessary to record the VOC content of the resulting mixture.

##### IV. Reporting Requirements

1. The permittee shall notify the Ohio EPA Southeast District Office in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days following the end of the calendar month.

##### V. Testing Requirements

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

**V. Testing Requirements (continued)**

**1.a** Emission Limitation:

2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance may be demonstrated based upon the record keeping requirements specified in section A.III.1 of these terms and conditions. Formulation data or the procedures specified in 40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC contents of the coatings.

**VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** No.12 Coater (P670)  
**Activity Description:** Paper coating operation

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 12 coater	OAC rule 3745-31-05(A)(3) (PTI 06-06693)	21.2 lbs/hr of VOC
	OAC rule 3745-21-09(F)	93 tpy of VOC 2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents.

**2. Additional Terms and Conditions**

**None**

**II. Operational Restrictions**

**None**

**III. Monitoring and/or Record Keeping Requirements**

1. The permittee shall collect and record the following information for each month for the coating operation:
  - a. the company identification for each coating and cleanup material employed;
  - b. the number of gallons of each coating and cleanup material employed;
  - c. the organic compound content of each coating and cleanup material, in pounds per gallon;
  - d. the total VOC emissions for all coating and cleanup material employed, in pounds;
  - e. the total number of hours the emissions unit was in operation; and
  - f. the average hourly organic compound emission rate for all coatings and cleanup materials, i.e., (e)/(d), in pounds per hour (average).

The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.

#### **IV. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each month during which the average hourly total organic emissions exceeded 21.2 lbs/ hr, and the actual average hourly organic compound emissions for each such month. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days following the end of the calendar month.
2. The permittee shall submit annual reports that specify the total volatile organic compound emissions from the emissions unit for the previous calendar year. These reports shall be submitted to the appropriate Ohio EPA District Office or local air agency by January 31 of each year.
3. The permittee shall notify the Director (the Ohio EPA Southeast District Office) in writing of any monthly record showing the use of noncomplying coatings. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA Southeast District Office) within 30 days following the end of the calendar month.

#### **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:

21.2 lbs/hr of VOC

Compliance Method:

Compliance may be demonstrated based upon the record keeping requirements specified in section A.III.1 of these terms and conditions. Formulation data or the procedures specified in 40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC contents of the coatings and cleanup material.

If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25A.

**1.b** Emission Limitation:

93 tpy of VOC

Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation for this emissions unit and dividing by 2000 lbs/ton.

**1.c** Emission Limitation:

2.9 pounds of VOC per gallon of coating, excluding water and exempt solvents

Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section A.III.1 of these terms and conditions. Formulation data or the procedures specified in 40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC content of coatings.

#### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Coal Fuel System (P730)  
**Activity Description:** Boiler coal fuel supply system

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
coal fuel system	none	See A.1.2.a below

**2. Additional Terms and Conditions**

- 2.a This emissions unit is an existing stationary source (installed in 1952) and is not located in an Appendix A area as described in OAC rule 3745-17-08; therefore, OAC rules 3745-17-07(B) and 3745-17-08(B) do not apply to this fugitive emissions unit.

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Fly Ash Stockpiling and Handling (P791)

**Activity Description:** Boiler fly ash disposal system

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
fly ash stockpiling and handling	none	See A.1.2.a below

**2. Additional Terms and Conditions**

- 2.a This emissions unit is an existing stationary source (installed in 1963) and is not located in an Appendix A area as described in OAC rule 3745-17-08; therefore, OAC rules 3745-17-07(B) and 3745-17-08(B) do not apply to this fugitive emissions unit.

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** Wastewater Treatment Facility (P800)  
**Activity Description:** Wastewater effluent processing system

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
wastewater treatment facility	none	none
		See A.I.2.a below.

**2. Additional Terms and Conditions**

- 2.a Pursuant to the provisions of OAC rule 3745-21-07(A)(1) and OAC rule 3745-15-01(O), this emissions unit is an "existing source" which is not located in a "Priority 1" county as indicated in paragraph (A) of OAC rule 3745-21-06. The provisions of OAC rule 3745-21-07(G), therefore, do not apply.

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Slaker (P901)  
**Activity Description:** Preparation of lime and causticizing of green liquor

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
preparation of lime and causticizing of green liquor, hot lime slaker system, controlled with a wet scrubber	OAC rule 3745-31-05(A)(3) (PTI 06-5311)	2.00 lbs/hr of particulate emissions 8.8 tpy of particulate emissions 0.67 lb/hr of VOC 2.9 tpy of VOC See A.II.1 below.
	OAC rule 3745-17-11(B)(1)	Compliance with this rule also includes compliance with OAC rule 3745-17-07(A). The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
	OAC rule 3745-21-07	The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05(A)(3).

##### 2. Additional Terms and Conditions

None

## II. Operational Restrictions

1. The minimum pressure drop or pressure drop range across the scrubber, and the minimum scrubber water flow rate shall be determined during the initial performance test that demonstrates that the emission unit is in compliance. That minimum pressure drop or pressure drop range across the scrubbers and minimum scrubber water flow rate shall be continuously maintained at all times while the emissions unit is in operation.
2. Fugitive particulate emissions from the hot lime slaker system shall be eliminated or minimized at all times. Specifically, the permittee shall employ the following control measures:
  - a. the hot lime elevator shall be totally enclosed;
  - b. the hot lime elevator discharge to the hot lime bin shall be totally enclosed and sealed and shall be operated under negative pressure;
  - c. the hot lime bin shall be totally enclosed;
  - d. the hot lime bin hopper discharge line to the slaker shall be totally enclosed and the gate valve sealed;
  - e. the hot lime bin hopper discharge line to the slaker shall discharge to the slaker within the enclosure of the slaker;
  - f. the hot lime bin fugitive dust vent line shall be totally enclosed and shall operate under negative pressure;
  - g. green liquor rejects raked from the hot lime slaker shall be removed from the caustic plant area and disposed of properly before the material dries to the point of producing emissions when handled by a front end loader; and
  - h. any dry materials accidentally spilled shall be immediately wetted and removed from the area.

## III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain equipment to monitor the pressure drop across the hot lime vent bin and the slaker scrubber. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual.
2. Pressure monitors shall be used to show the caustic plant operators the operating pressure of the hot lime bin vent line and the differential pressure across the hot lime slaker scrubber at all times. The permittee shall determine the differential pressure range required to maintain compliance with the requirements in section A.I.1 and an alarm shall be provided to alert operators if the pressure drop is not within that determined range. A hard copy pressure drop trend report shall be available for each day of operation and kept on file for at least one year.
3. Records shall be kept on an hourly basis of the operating pressure on the hot lime bin vent and of the differential pressure across the hot lime slaker scrubber on the caustic plant operator's log sheet. Any deviations from normal operations shall be noted as to the cause of the deviations and the corrective action taken.
4. The permittee shall record the hours of operation for this emissions unit.

## IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the parameters specified in section A.II. were not maintained at the levels specified in section A.II.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
3. The permittee shall submit annual reports which specify the total particulate and volatile organic compound emissions from this emissions unit for the previous year. The reports shall be submitted to the appropriate Ohio EPA 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.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

2.00 lbs/hr of particulate emissions

Applicable Compliance Method:

Compliance may be based upon the emission factor of 2.00 lbs/hr of particulate emissions established by the permittee from operating data.

If required, compliance shall be determined through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

1.b Emission Limitation:

8.8 tpy of particulate emissions

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation and dividing by 2000 lbs/ton.

1.c Emission Limitation:

0.67 lb/hr of VOC

Applicable Compliance Method:

Compliance shall be demonstrated based upon the emission testing requirements specified in section A.V.2.

1.d Emission Limitation:

2.9 tpy of VOC

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual hours of operation and dividing by 2000 lbs/ton.

1.e Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in 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 approximately 2.5 years after the effective date of this permit, and again within 6 months prior to permit expiration;
  - b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for VOC in accordance with the test methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25; and
  - c. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise approved in writing by the Ohio EPA Southeast District Office.

Not later than 30 days prior to the proposed test dates, the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the persons who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in Ohio EPA's refusal to accept the results of the emission tests.

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the tests, 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 emission tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Southeast District Office within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, and obtain prior approval for the additional time from the Ohio EPA Southeast District Office.

## **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Woodyard (P902)

**Activity Description:** Log receiving, bark shredding, wood residue processing systems

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
woodyard including: log receiving, bark shredding, wood residue processing systems	OAC rule 3745-31-05(A)(3) (PTI 06-1752)	The woodyard area shall employ best available technology as follows:
Debarking		The debarking operation shall be controlled by wet suppression at all times to eliminate the visible emissions of fugitive dust.
Chipping		The chipping operation emissions shall be vented to a cyclone at all times to eliminate the visible emissions of fugitive dust.
Screening		The screening operation shall be enclosed to eliminate the visible emissions of fugitive dust.
Conveying		The conveying operations shall be enclosed and belt brushes shall be employed at all times to eliminate the visible emissions of fugitive dust.

##### 2. Additional Terms and Conditions

- 2.a The material handling operations subject to the requirements of this permit are listed below:
  - i. debarking;
  - ii. chipping;
  - iii. screening; and
  - iv. conveying.

**2. Additional Terms and Conditions (continued)**

**2.b** The permittee shall employ best available control measures for the material handling operations listed below. In accordance with the permittee's permit application, the permittee has committed to perform the following control measures to ensure compliance:

Material Handling Operations	Control Measures
debarking	wet suppression
chipping	vented to cyclone
screening	enclosure
conveying	enclosure and belt brushes

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

- 2.c** For each material handling operation that is not adequately enclosed, the control measures specified in section A.I.2.b above shall be implemented if the permittee determines, as a result of the inspection conducted pursuant to the requirements of section A.III.1 of these terms and conditions, that the control measures are necessary to ensure compliance with the requirements of section A.I.1 above. Any required implementation of the control measures shall continue during the operation of the material handling operation until further observation confirms that use of the control measures is unnecessary.
- 2.d** Implementation of the control measures specified in section A.I.2.b above is appropriate and sufficient to satisfy the requirements of OAC rule 3745-31-05.
- 2.e** No visible particulate emission from the material handling operations, except for one minute during any 60-minute observation period.
- 3.** This facility is not located in an Appendix A area as described in OAC rule 3745-17-08; therefore, OAC rules 3745-17-07 and 3745-17-08 do not apply to this fugitive emissions unit.

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

**1.** Except as otherwise provided in this section, the permittee shall perform inspections of such operations in accordance with the following minimum frequencies:

Material Handling Operation	Minimum Inspection Frequency
debarking	weekly
chipping	weekly
screening	weekly
conveying	weekly

- 2.** The inspections identified in section A.III.1 above shall be performed during representative, normal operating conditions.
- 3.** The permittee may, upon receipt of written approval from the Ohio EPA Southeast District Office, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the applicable requirements.

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

4. The permittee shall maintain records of the following information:
  - a. the date and reason any required inspection was not performed;
  - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures:
  - c. the dates the control measure were implemented; and
  - d. on a calendar quarter basis, the total number of days the control measures were implemented.
5. The information in section A.III.4.d above shall be kept separately for each material handling operation identified above, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

### **IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
  - a. each day during which an inspection was not performed by the required frequency; and
  - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with section A.1.c.ii of the General Terms and Conditions of this permit.

### **V. Testing Requirements**

1. If required, compliance with the visible emission limitation for the material handling operations identified above shall be determined in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 22.

### **VI. Miscellaneous Requirements**

**None**

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

**Part III - Terms and Conditions for Emissions Units**

**Emissions Unit ID:** No. 12 Paper Dryer Burners (R004)

**Activity Description:** Paper coating and drying

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
No. 12 paper machine size press, one service tank, and 30 mmBtu/hr gas-fired hot air dryer	OAC rule 3745-31-05 (PTI 06-5734)	0.01 pound of VOC per gallon of coating, excluding water and exempt solvents
	OAC rule 3745-21-09(F)	35.68 tpy of VOC The requirements of this rule are less stringent than the requirements established pursuant to OAC rule 3745-31-05.
	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

1. The permittee shall burn only natural gas as fuel in the gas-fired burners of this emissions unit.

**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, identification number, density and gallons of each coating, as applied;
  - b. the VOC content of each coating (excluding water and exempt solvents), as applied; and
  - c. the total VOC emissions, in tons, for all coatings used during the month.
2. 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.

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

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stacks serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
  - 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 notify the Ohio EPA Southeast District Office in writing of any monthly record showing the use of coatings containing greater than 0.01 pound of VOC, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Ohio EPA Southeast District Office within 30 days following the end of the calendar month.
2. 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.
3. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 and July 31 of each year and shall cover the previous 6-month period.
4. The permittee shall submit annual reports which specify the total volatile organic compound emissions from the emissions unit for the previous calendar year. These reports shall be submitted to the Ohio EPA Southeast District Office by January 31 of each year.

### V. Testing Requirements

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

**1.a** Emission Limitation:

0.01 pound of VOC per gallon of coating, excluding water and exempt solvents

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in section A.III.1 of these terms and conditions. Formulation data or the procedures specified in 40 CFR Part 60, Appendix A, Method 24 shall be used to determine the VOC contents of the coatings.

**1.b** Emission Limitation:

35.68 tpy of VOC

Applicable Compliance Method:

Compliance shall be determined based on the record keeping requirements of section A.III.1 of these terms and conditions.

**V. Testing Requirements (continued)**

**1.c** Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Million Gallon Weak Liquor Tank (T031)

**Activity Description:** Weak black liquor storage

#### 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
million gallon weak liquor tank	OAC rule 3745-21-07(D)	See A.1.2.a below.

##### 2. Additional Terms and Conditions

- 2.a The permittee shall not store any volatile photochemically reactive materials, as defined in OAC rule 3745-21-01(C)(5), in this emissions unit.

##### II. Operational Restrictions

None

##### III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records that identify each liquid organic material stored in this emissions unit and whether or not it is a photochemically reactive material.

##### IV. Reporting Requirements

1. The permittee shall submit a report to the Ohio EPA Southeast District Office identifying any time photochemically reactive materials were stored in this emissions unit. Each report shall be submitted to the Ohio EPA Southeast District Office within 30 days after the permittee determines that photochemically reactive materials were stored in this emissions unit.

##### V. Testing Requirements

None

##### VI. Miscellaneous Requirements

None

**B. State Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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