



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

03/16/01

CERTIFIED MAIL

RE: Proposed Title V Chapter 3745-77 permit

06-16-01-0001

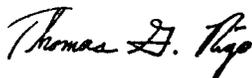
Stone Container Corp.- Coshocton

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

Dear Ms. Damico:

The proposed issuance of the Title V permit for Stone Container Corp.- Coshocton, has been created in Ohio EPA's State Air Resources System (STARS) on 03/16/01, for review by USEPA. This proposed action is identified in STARS as  3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and  Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact Mike Ahern, DAPC Permit Management Unit supervisor at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,



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

cc: Southeast District Office
Becky Castle, DAPC PMU

Ohio EPA

State of Ohio Environmental Protection Agency

PROPOSED TITLE V PERMIT

Date: 03/16/01

Effective Date: **To be entered upon final issuance**

Expiration Date: **To be entered upon final issuance**

This document constitutes issuance to:

Stone Container Corp.- Coshocton
500 North Fourth Street
Coshocton, OH 43812

of a Title V permit for Facility ID: 06-16-01-0001

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

B002 (No. 2 Boiler)

Natural gas fired-boiler which serves as standby to No. 6 Boiler along with B003, B004 & B005.

B003 (No. 3 Boiler)

Natural gas fired-boiler which serves as standby to No. 6 Boiler along with B002, B004 & B005.

B004 (No. 4 Boiler)

Natural gas fired-boiler which serves as standby to No. 6 Boiler along with B002, B003 & B005.

B005 (No. 5 Boiler)

Natural gas fired-boiler which serves as standby to No. 6 Boiler along with B002, B003 & B004.

B006 (No. 6 Boiler)

Mill's main boiler co-fired with wood residue, natural gas, wastewater sludge, and wastepaper rejects

N001 (Fluidized Bed Reactor)

Reactor used for soda ash recovery

P003 (Evaporators 1 and 2)

Two evaporator systems used in the chemical recovery area

P005 (Green Liquor Prep)

Green liquor preparation area used to make cooking liquor for use in the pulp mill

P006 (Papermachine #1)

Includes all equipment associated with making paper in line #1

P007 (Papermachine #2)

Includes all equipment associated with making paper in line #2

P008 (Pulp Mill)

Includes all equipment associated with pulping

P009 (Hydropulper)

Used to process recycled fiber for use in the papermachines

P010 (Wastewater Plant)

Treats the Mill's wastewater prior to discharge to the river

T004 (Black Liquor Tanks)

Currently used to store weak liquor, overflow, & heavy liquor [originally permitted as T001, T002, T003]

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

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

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-

annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the

Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

- ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC

rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);

- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

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

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

18. Insignificant Activity

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

B. State Only Enforceable Section

1. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

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

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

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

F001 - wood handling;
F002 - soda ash handling;
F003 - fly ash handling;
P004 - main product silo;
P012 - emergency generator;
Z001 - roadways and parking;
Z002 - firewater loop emergency back-up pump; and
Z003 - primary clarifier effluent emergency back-up pump.

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. 2 Boiler (B002)

Activity Description: Natural gas fired-boiler which serves as standby to No. 6 Boiler along with B003, B004 & B005.

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-boiler which serves as standby to #6 boiler along with B003, B004 & B005 (see A.II.1)	OAC rule 3745-17-10(B)(1)	0.020 lb of particulate emissions per mmBtu of actual heat input
	OAC rule 3745-17-07(A)	See A.I.2.a below.

2. Additional Terms and Conditions

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

II. Operational Restrictions

- The permittee shall operate this emissions unit as a standby unit only. This emissions unit shall not be operated except as a substitute for boiler #6 (B006).
- The permittee shall not operate this emissions unit more than 1008 hours per year.
- The permittee shall burn only natural gas as fuel in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

- 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.
- The permittee shall maintain annual records of the total hours of operation for this emissions unit.
- The permittee shall maintain records of the quantity of natural gas combusted during each operating day, in cubic feet.

IV. Reporting Requirements

- 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.
- The permittee shall also submit an annual report that identifies the total hours of operation for this emissions unit. The annual report shall be submitted by January 30 of each year.

V. Testing Requirements

1. Emissions Limitation:

0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated through emission calculations using the particulate emission factor from AP-42, Chapter 1, Table 1.4-2 (7/98) and the worst-case hourly fuel consumption:

$$(1.9 \text{ lbs}/1,000,000 \text{ cu.ft.}) \times (123,060 \text{ cu.ft./hr}) \times (1 \text{ hr}/117.2 \text{ mmBtu}) = 0.002 \text{ lb/mmBtu}$$

2. Emissions Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission 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: No. 3 Boiler (B003)

Activity Description: Natural gas fired-boiler which serves as standby to No. 6 Boiler along with B002, B004 & B005.

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-boiler which serves as standby to #6 boiler along with B002, B004 & B005 (see A.II.1)	OAC rule 3745-17-10(B)(1)	0.020 lb of particulate emissions per mmBtu of actual heat input
	OAC rule 3745-17-07(A)	See A.I.2.a below.

2. Additional Terms and Conditions

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

II. Operational Restrictions

- The permittee shall operate this emissions unit as a standby unit only. This emissions unit shall not be operated except as a substitute for boiler #6 (B006).
- The permittee shall not operate this emissions unit more than 1008 hours per year.
- The permittee shall burn only natural gas as fuel in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

- 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.
- The permittee shall maintain annual records of the total hours of operation for this emissions unit.
- The permittee shall maintain records of the quantity of natural gas combusted during each operating day, in cubic feet.

IV. Reporting Requirements

- 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.
- The permittee shall also submit an annual report that identifies the total hours of operation for this emissions unit. The annual report shall be submitted by January 30 of each year.

V. Testing Requirements

1. Emissions Limitation:

0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated through emission calculations using the particulate emission factor from AP-42, Chapter 1, Table 1.4-2 (7/98) and the worst-case hourly fuel consumption:

$(1.9 \text{ lbs}/1,000,000 \text{ cu.ft.}) \times (122,955 \text{ cu.ft./hr}) \times (1 \text{ hr}/117.1 \text{ mmBtu}) = 0.002 \text{ lb/mmBtu}$

2. Emissions Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission 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: No. 4 Boiler (B004)

Activity Description: Natural gas fired-boiler which serves as standby to No. 6 Boiler along with B002, B003 & B005.

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>
natural gas fired-boiler which serves as standby to #6 boiler along with B002, B003 & B005 (see A.II.1)	OAC rule 3745-17-10(B)(1)	0.020 lb of particulate emissions per mmBtu of actual heat input
	OAC rule 3745-17-07(A)	See A.I.2.a below.

2. Additional Terms and Conditions

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

II. Operational Restrictions

1. The permittee shall operate this emissions unit as a standby unit only. This emissions unit shall not be operated except as a substitute for boiler #6 (B006).
2. The permittee shall not operate this emissions unit more than 1008 hours per year.
3. The permittee shall burn only natural gas as fuel in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain annual records of the total hours of operation for this emissions unit.
3. The permittee shall maintain records of the quantity of natural gas combusted during each operating day, in cubic feet.

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 also submit an annual report that identifies the total hours of operation for this emissions unit. The annual report shall be submitted by January 30 of each year.

V. Testing Requirements

1. Emissions Limitation:

0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated through emission calculations using the particulate emission factor from AP-42, Chapter 1, Table 1.4-2 (7/98) and the worst-case hourly fuel consumption:

$$(1.9 \text{ lbs}/1,000,000 \text{ cu.ft.}) \times (245,910 \text{ cu.ft./hr}) \times (1 \text{ hr}/234.2 \text{ mmBtu}) = 0.002 \text{ lb/mmBtu}$$

2. Emissions Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission 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: No. 5 Boiler (B005)

Activity Description: Natural gas fired-boiler which serves as standby to No. 6 Boiler along with B002, B003 & B004.

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-boiler which serves as standby to #6 boiler along with B002, B003 & B004 (see A.II.1)	OAC rule 3745-17-10(B)(1)	0.020 lb of particulate emissions per mmBtu of actual heat input
	OAC rule 3745-17-07(A)	See A.I.2.a below.

2. Additional Terms and Conditions

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

II. Operational Restrictions

- The permittee shall operate this emissions unit as a standby unit only. This emissions unit shall not be operated except as a substitute for boiler #6 (B006).
- The permittee shall not operate this emissions unit more than 1008 hours per year.
- The permittee shall burn only natural gas as fuel in this emissions unit.

III. Monitoring and/or Record Keeping Requirements

- 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.
- The permittee shall maintain annual records of the total hours of operation for this emissions unit.
- The permittee shall maintain records of the quantity of natural gas combusted during each operating day, in cubic feet.

IV. Reporting Requirements

- 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.
- The permittee shall also submit an annual report that identifies the total hours of operation for this emissions unit. The annual report shall be submitted by January 30 of each year.

V. Testing Requirements

1. Emissions Limitation:

0.020 pound of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated through emission calculations using the particulate emission factor from AP-42, Chapter 1, Table 1.4-2 (7/98) and the worst-case hourly fuel consumption:

$(1.9 \text{ lbs}/1,000,000 \text{ cu.ft.}) \times (192,150 \text{ cu.ft./hr}) \times (1 \text{ hr}/183 \text{ mmBtu}) = 0.002 \text{ lb/mmBtu}$

2. Emissions Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission 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: No. 6 Boiler (B006)

Activity Description: Mill's main boiler co-fired with wood residue, natural gas, wastewater sludge, and wastepaper rejects

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>
boiler #6, co-fired with wood residue, natural gas, wastewater treatment sludge, and wastepaper rejects, controlled with a cyclone and venturi wet scrubber	40 CFR 52.21 PSD Limitation per PTI 06-4159	0.08 lb of particulate emissions per mmBtu of actual heat input
		0.02 lb of sulfur dioxide (SO ₂) per mmBtu of actual heat input
		0.40 lb of carbon monoxide (CO) per mmBtu of actual heat input
		0.0242 lb of hydrocarbons (HC) per mmBtu of actual heat input
		0.38 lb of nitrogen oxides (NO _x) per mmBtu of actual heat input
	OAC rule 3745-17-07(A)	See A.1.2.a below.
OAC rule 3745-17-10(B)(1)	less stringent than BACT	
40 CFR Part 60, Subpart D	less stringent than BACT	
40 CFR Part 61, Subpart E	3200 grams of mercury/24 hours	

2. Additional Terms and Conditions

- 2.a Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
- 2.b The permittee shall not alter the design stack parameters, including exit gas temperature, exit gas velocity, stack diameter and stack height without written authorization from the Ohio EPA Southeast District Office. The air quality analysis relies heavily on the combination of stack parameters, control devices and emission limitations such that any change in these factors could alter the results of the air quality analysis.

II. Operational Restrictions

1. This emissions unit shall not exceed 644.0 mmBtu of actual heat input per hour.
2. The permittee shall not operate this emissions unit simultaneously with emissions units B002, B003, B004, and/or B005. Operation of emissions units B002, B003, B004, and/or B005 shall be restricted to the regularly scheduled yearly maintenance period and to emergency shutdowns of this emissions unit.

II. Operational Restrictions (continued)

3. The permittee shall grind the wastepaper rejects and, together with the wastewater treatment sludge, blend both evenly with the regular wood fuel.
4. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 15 inches of water at all times while the emissions unit is in operation.
5. The scrubber water flow rate shall be continuously maintained at a value of not less than 2000 gallons per minute at all times while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly install, operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and the scrubber water flow rate while the emissions unit is in operation. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals
2. The permittee shall collect and record the following information each day:
 - a. the pressure drop across the scrubber, in inches of water, on an hourly basis;
 - b. the scrubber water flow rate, in gallons per minute, on an hourly basis;
 - c. a log or record of the downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit;
 - d. the pounds of wastewater treatment sludge and wastepaper rejects burned;
 - e. the total heat input for each hour of operation, in mmBtu/hour; and
 - f. any time this emissions unit was operated simultaneously with emissions units B002, B003, B004 or B005.
3. Following the initial mercury emissions stack test required in 40 CFR 61.53(d) or the alternative initial sludge sampling test required in 40 CFR 61.54, no changes shall be made in the operation of this emissions unit which would potentially increase mercury emissions above the level determined by the initial or most recent stack test or sludge sampling test until the new mercury emissions level has been estimated by calculations and the results reported to the Ohio EPA Southeast District Office. Should mercury emission calculations indicate emission levels greater than 1600 grams per 24-hour period, further emission testing or sludge sampling shall be required as defined in section A.III.4.
4. In accordance with 40 CFR 61.55(a), if the mercury emissions from this emissions unit exceeds 1600 grams per 24-hour period, demonstrated either by stack sampling pursuant to 40 CFR 61.53 or sludge sampling pursuant to 40 CFR 61.54, the permittee shall monitor mercury emissions at intervals of at least once per year by use of 40 CFR Part 61, Appendix B, Method 105 or the procedures specified in 40 CFR 61.53(d)(2) and (d)(4).

In accordance with 40 CFR 61.53(d)(5) and 40 CFR 61.54(f), all stack and sludge samples shall be analyzed and mercury emissions shall be determined within 30 days after sample collection.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify:
 - a. all periods of time during which the static pressure drop across the scrubber and/or the scrubber water flow rate were not maintained at or above the required levels;
 - b. all periods of time that this emissions unit was operated above 644.0 mmBtu/hr of actual heat input; and
 - c. any period of time that this emissions unit was operated simultaneously with emissions units B002, B003, B004 or B005.

IV. Reporting Requirements (continued)

2. In accordance with 40 CFR 61.53(d)(4) and 40 CFR 61.54(e), the permittee shall report the results of all mercury emission calculations to the Ohio EPA Southeast District Office. Results shall be submitted within 30 days of completing the calculations.
3. In accordance with 40 CFR 61.53(d)(5) and 40 CFR 61.54(f), the results of each mercury monitoring procedure shall be submitted to the Ohio EPA Southeast District Office by a registered letter dispatched within 15 calendar days following the date the mercury emissions were determined.
4. The permittee shall report to the Ohio EPA Southeast District Office any change in the disposition of waste materials generated from this emissions unit, from that which was reported at the time of start-up, prior to such change.

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

- 1.a Emission Limitation:

0.08 lb of particulate emissions per mmBtu of actual heat input

Applicable Compliance Method:

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

- i. The emission testing shall be conducted once during each calendar year.
- ii. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission limitation for particulates.
- iii. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- iv. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, burning all permitted fuels, unless otherwise specified or approved by the Ohio EPA Southeast District Office.

Not later than 30 days prior to the proposed test date, 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 test, and the person(s) who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA Southeast District Office's refusal to accept the results of the emission test.

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

V. Testing Requirements (continued)

1.b Emission Limitation:

0.02 lb of SO₂ per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated using the SO₂ emission factor in USEPA's Compilation of Air Pollutant Emission Factors (AP-42), Fifth Edition, Chapter 1, Table 1.6-2 (2/99). Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 6. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

1.c Emission Limitation:

0.40 lb of CO per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated using the CO emission factor in USEPA's Compilation of Air Pollutant Emission Factors (AP-42), Fifth Edition, Chapter 1, Table 1.6-2 (2/99). Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 10. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

1.d Emission Limitation:

0.0242 lb of HC per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated using the TOC emission factor in USEPA's Compilation of Air Pollutant Emission Factors (AP-42), Fifth Edition, Chapter 1, Table 1.6-3 (2/99). Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 25A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

1.e Emission Limitation:

0.38 lb of NO_x per mmBtu of actual heat input

Applicable Compliance Method:

Compliance shall be demonstrated using the NO_x emission factor in USEPA's Compilation of Air Pollutant Emission Factors (AP-42), Fifth Edition, Chapter 1, Table 1.6-2 (2/99). Emissions testing, if required, shall be conducted using the following test method: 40 CFR Part 60, Appendix A, Method 7. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

1.f Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the 20% opacity emissions limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the methods and procedures specified in OAC rule 3745-17-03(B)(1).

Facility Name: **Smurfit-Stone Corporation**

Facility ID: **06-16-01-0001**

Emissions Unit: **No. 6 Boiler (B006)**

V. Testing Requirements (continued)

1.g Emission Limitation:

3200 grams of mercury per 24 hours

Applicable Compliance Method:

Compliance shall be demonstrated based upon emission testing conducted in accordance with the procedures set forth in 40 CFR 61.53(d)(2) and (d)(4) or 40 CFR 61.54.

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: Fluidized Bed Reactor (N001)
Activity Description: Reactor used for soda ash recovery

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>
fluidized bed reactor for recovery of soda ash from spent black liquor, controlled with a cyclone and a venturi wet scrubber (see A.I.2.a)	OAC rule 3745-17-09(B)	0.10 lb of particulate emissions per 100 lbs of material charged
	OAC rule 3745-17-07(A)	See A.I.2.b below.

2. Additional Terms and Conditions

- The proposed National Emission Standard for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63, Subpart MM will become applicable to this emissions unit at the time of promulgation. The permittee is required to meet all applicable emissions limitations in this subpart by the compliance date established in the final rule.
- Visible particulate emissions, from any stack, shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

II. Operational Restrictions

- This emissions unit shall be designed, operated and maintained so as to prevent the emission of objectionable odors.
- The pressure drop across the scrubber shall be continuously maintained within the range of 40 to 70 inches of water at all times while the emissions unit is in operation.
- The scrubber water flow rate shall be continuously maintained at a value of not less than 1000 gallons per minute at all times while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

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

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

2. The permittee shall collect and record the following information each day:
 - a. the pressure drop across the scrubber, in inches of water, on an hourly basis;
 - b. the scrubber water flow rate, in gallons per minute, on an hourly basis; and
 - c. the downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

IV. Reporting Requirements

1. The permittee shall submit 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 scrubber; and
 - b. the scrubber water flow rate.

V. Testing Requirements

1. Emission Limitation:

0.10 lb of particulate emissions/100 lbs of material charged

Applicable Compliance Method:

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 after issuance of the permit and within 6 months prior to permit renewal.
- b. The emission testing shall be conducted to demonstrate compliance with the 0.10 lb of particulates/100 lbs of material charged allowable emissions limitation.
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate: 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(9). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
- d. The test 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 date(s), 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 time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

V. Testing Requirements (continued)

2. Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the 20% opacity emissions limitation shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR, Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996.

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: Evaporators 1 and 2 (P003)

Activity Description: Two evaporator systems used in the chemical recovery area

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>
evaporators 1 and 2 (part of the LVHC system, as defined in 40 CFR Part 63, Subpart S, section 63.441)	40 CFR Part 63, Subpart S	See A.I.2.a and A.I.2.b below.
evaporator #2 controlled with a condenser	OAC rule 3745-31-05(A)(3) (PTI 06-4833)	3.5 lbs/hr of volatile organic compounds (VOC) and 15 tpy of VOC from the condenser

2. Additional Terms and Conditions

- 2.a The permittee shall achieve compliance with the requirements of 40 CFR Part 63, Subpart S by no later than April 16, 2001 as follows:
 - i. No later than April 16, 2001, the permittee shall enclose and vent emissions from this emissions unit to a closed-vent system.
 - ii. No later than April 16, 2001, the permittee shall route emissions from the closed-vent system required in section A.I.2.a.i to a control device that:
 - (a) reduces total HAP emissions by 98 percent or more, by weight; or
 - (b) reduces the total HAP concentration at the outlet of the thermal oxidizer to 20 parts per million or less, by volume, corrected to 10 percent oxygen on a dry basis; or
 - (c) reduces total HAP emissions using a thermal oxidizer designed and operated at a minimum temperature of 871 deg.C (1600 deg.F) and a minimum residence time of 0.75 seconds; or
 - (d) 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.
- 2.b No later than April 16, 2001, the permittee must comply with the requirements of 40 CFR Part 63, Subpart A - General Provisions, as specified in 40 CFR Part 63, Subpart S, Table 1.

II. Operational Restrictions

1. The average temperature of the exhaust gases from the condenser, for any 3-hour block of time, shall not be greater than 110 degrees Fahrenheit.

II. Operational Restrictions (continued)

2. No later than April 16, 2001, the permittee shall operate the selected control device in section A.I.2.a.ii 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 this permit 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. No later than April 16, 2001, each enclosure and closed-vent system used for capturing and transporting vent streams that contain HAP emissions shall meet the following requirements:
 - a. Each enclosure shall maintain negative pressure at each enclosure or hood opening as demonstrated by the procedures specified in 40 CFR Part 63, Subpart S, section 63.457(e). Each enclosure or hood opening closed during the initial performance test shall be maintained in the same closed and sealed position as during the performance test at all times except when necessary to use the opening for sampling, inspection, maintenance, or repairs.
 - b. Each component of the closed-vent system that is operated at positive pressure and located prior to a control device shall be designed for and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million by volume above background, as measured by the procedures specified in 40 CFR Part 63, Subpart S, section 63.457(d).
 - c. 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 either of the following requirements:
 - i. On each bypass line, the permittee shall install, calibrate, maintain, and operate according to manufacturer's specifications a flow indicator that provides a record of the presence of gas stream flow in the bypass line at least once every 15 minutes. The flow indicator shall be installed in the bypass line in such a way as to indicate flow in the bypass line.

or

 - ii. For bypass line valves that are not computer controlled, the permittee shall maintain the bypass line valve in the closed position with a car seal or 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. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain a continuous temperature monitor and recorder which measures and records the temperature of the exhaust gases from the condenser when the emissions unit is in operation. Units shall be in degrees Fahrenheit. The accuracy for each thermocouple, monitor, and recorder shall be guaranteed by the manufacturer to be within plus or minus 1 percent of the temperature being measured or plus or minus 5 degrees Fahrenheit, whichever is greater. The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
2. The permittee shall collect and record, each day, the following information for the condenser serving this emissions unit:
 - a. all 3-hour blocks of time (when the emissions unit was in operation) during which the average temperature of the exhaust gases from the condenser was greater than 110 degrees Fahrenheit; and
 - b. a log or record of the downtime for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.
3. No later than April 16, 2001, the permittee shall install, calibrate, certify, operate, and maintain according to the manufacturer's specifications, a continuous monitoring system (CMS), as specified in 40 CFR Part 63, Subpart S, section 63.453.

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

4. A CMS shall be operated to measure the temperature in the firebox or in the ductwork immediately downstream of the firebox and before any substantial heat exchange occurs for each thermal oxidizer used to comply with the requirements of section A.I.2.a of this permit. If using a control device specified in sections A.I.2.a.ii.(b) or (c), the permittee shall monitor the parameter specified and the temperature and concentration limits specified.
5. The permittee using a control device, technique, or an alternative parameter other than those specified in 40 CFR Part 63, Subpart S, section 63.453 shall install a CMS and establish appropriate operating parameters to be monitored that demonstrate, to the USEPA Administrator's and Ohio EPA's satisfaction, continuous compliance with the applicable control requirements.
6. To establish or reestablish, the value for each operating parameter required to be monitored in sections A.III.3 and A.III.4 of this permit, or to establish appropriate parameters for section A.III.5 of this permit, the permittee shall use the following procedures:
 - a. During the initial performance test or any subsequent performance test, continuously record the operating parameter.
 - 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 USEPA Administrator's and Ohio EPA's approval the rationale for selecting the monitoring parameters necessary to comply with section A.III.3 of this permit.
 - d. The permittee shall provide for the Administrator's and Ohio EPA's approval, the rationale for the selected operating parameter value, and monitoring frequency, and averaging time. 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.
7. No later than April 16, 2001, the permittee shall conduct the following for each enclosure and closed-vent system in section A.I.2.a:
 - 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, demonstrate no detectable leaks measured initially and annually by procedures in accordance with 40 CFR Part 63, Subpart S, section 63.457(d).
 - d. Demonstrate initially and annually that each enclosure opening is maintained at negative pressure as specified in 40 CFR Part 63, Subpart S, section 63.457(e).
 - 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.
8. If an inspection required by section A.III.7 identifies visible defects in ductwork, piping, enclosures or connections to covers, or if an instrument reading of 500 parts per million by volume or greater above background is measured, or if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable:
 - a. a first effort to repair or correct the closed-vent system shall be made as soon as practicable but no later than 5 calendar days after the problem is identified; and
 - b. the repair or corrective action shall be completed no later than 15 calendar days after the problem is identified.

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

9. No later than April 16, 2001, the permittee shall prepare and maintain a site-specific inspection plan including a drawing or schematic of the components of applicable affected equipment 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.
10. The permittee shall record the CMS parameters specified in 40 CFR Part 63, Subpart S, section 63.453 and meet the requirements of section A.III.11 of this permit for any new affected process equipment or pulping process condensate stream that becomes subject to the standards in 40 CFR Part 63, Subpart S due to a process change or modification.
11. No later than April 16, 2001, the permittee shall comply with all other monitoring and recordkeeping requirements of 40 CFR Part 63, Subpart A, as specified in 40 CFR Part 63, Subpart S, Table 1.

IV. Reporting Requirements

1. The permittee shall submit temperature deviation (excursion) reports that identify all 3-hour blocks of time during which the average temperature of the exhaust gases from the condenser exceeded the temperature limitation specified above.
2. No later than April 16, 2001, 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.
3. The permittee shall meet the requirements specified in section A.IV.2 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.1 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

3.5 lbs/hr of VOC from the condenser

Applicable Compliance Method:

The permittee shall demonstrate compliance with the 3.5 lbs/hr of VOC emissions limitation by a one time calculation using the emission factor specified in the document entitled "National Council of the Paper Industry for Air and Stream Improvement (NCASI)", dated November, 1994:

VOC, in lbs/hr = EF (lb/ODTP) X Pulp Production Rate (ODTP/day) X day/24 hours

V. Testing Requirements (continued)

1.b Emission Limitation:

15 tpy of VOC from the condenser

Applicable Compliance Method:

The permittee shall demonstrate compliance with the 15 tpy of VOC emission limitation by the one time calculation of the lbs/hr of VOC determined in section B.V.1 multiplied by 8760 hours/year, and divided by 2000 lbs/ton.

2. Emission Limitation:

control of total HAP emissions (as of April 16,2001)

Applicable Compliance Method:

Unless controlled by a control device listed in sections A.I.2.a.ii.(c) or A.I.2.a.ii.(d), the permittee shall conduct emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 180 days of the compliance date, April 16, 2001, and within 6 months of permit renewal.
- b. The emission testing shall be conducted to demonstrate compliance with the HAP emissions limitation as specified in 40 CFR Part 63, Subpart S.
- c. Test method(s) and procedures identified in 40 CFR Part 63, Subpart S, section 63.457 and 40 CFR Part 63, Subpart A, section 63.7 shall be employed to demonstrate compliance with the HAP emissions limitation.
- d. The test(s) 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.

Personnel from the USEPA and the Ohio EPA Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report, which includes the analysis of samples, determination of emissions and raw data, 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 test(s). The results of the performance test shall be submitted as part of the notification of compliance status. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA District Office.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office and the USEPA Administrator. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's refusal to accept the results of the emission test(s).

In the event the permittee is unable to conduct the performance test on the date specified in the notification due to unforeseeable circumstances beyond his or her control, the permittee shall notify the USEPA Administrator and the Ohio EPA Southeast District Office within 5 days prior to the scheduled performance test date and specify the date when the performance test is rescheduled.

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: Green Liquor Prep (P005)

Activity Description: Green liquor preparation area used to make cooking liquor for use in the pulp mill

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>
green liquor prep including dissolution tank, slurry tank, and green liquor tank	none	none See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a This emissions unit is an existing stationary source (installed in 1971) 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

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: Papermachine #1 (P006)

Activity Description: Includes all equipment associated with making paper in line #1

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>
papermachine #1	none	none See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a This emissions unit is an existing stationary source (installed in 1971) 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

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: Papermachine #2 (P007)

Activity Description: Includes all equipment associated with making paper in line #2

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
papermachine #2	none	none See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a This emissions unit is an existing stationary source (installed in 1971) 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

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: Pulp Mill (P008)
Activity Description: Includes all equipment associated with pulping

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>
pulp mill - washers, vacuum pumps, presses, filtrate tanks, primary tower, fiber prep, secondary tower	none	none
pulp mill-(LVHC system, as defined in 40 CFR Part 63, Subpart S, section 63.441) digesters, hot stock refiners, blow tank, blow surge tank, and condenser	40 CFR Part 63, Subpart S	See A.I.2.a and A.I.2.b below.

2. Additional Terms and Conditions

- 2.a** The permittee shall achieve compliance with the requirements of 40 CFR Part 63, Subpart S by no later than April 16, 2001 as follows:
- i. No later than April 16, 2001, the permittee shall enclose and vent emissions from this emissions unit to a closed-vent system.
 - ii. No later than April 16, 2001, the permittee shall route emissions from the closed-vent system required in section A.I.2.a.i to a control device that:
 - (a) reduces total HAP emissions by 98 percent or more, by weight; or
 - (b) reduces the total HAP concentration at the outlet of the thermal oxidizer to 20 parts per million or less, by volume, corrected to 10 percent oxygen on a dry basis; or
 - (c) reduces total HAP emissions using a thermal oxidizer designed and operated at a minimum temperature of 871 deg.C (1600 deg.F) and a minimum residence time of 0.75 seconds; or
 - (d) 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.
- 2.b** No later than April 16, 2001, the permittee must comply with the requirements of 40 CFR Part 63, Subpart A - General Provisions, as specified in 40 CFR Part 63, Subpart S, Table 1.

II. Operational Restrictions

1. No later than April 16, 2001, the permittee shall operate the selected control device in section A.I.2.a.ii 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 this permit 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.

2. No later than April 16, 2001, each enclosure and closed-vent system used for capturing and transporting vent streams that contain HAP emissions shall meet the following requirements:

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

- b. Each component of the closed-vent system that is operated at positive pressure and located prior to a control device shall be designed for and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million by volume above background, as measured by the procedures specified in 40 CFR Part 63, Subpart S, section 63.457(d).

- c. 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 either of the following requirements:

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

or

- ii. For bypass line valves that are not computer controlled, the permittee shall maintain the bypass line valve in the closed position with a car seal or 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. Monitoring and/or Record Keeping Requirements

1. No later than April 16, 2001, the permittee shall install, calibrate, certify, operate, and maintain according to the manufacturer's specifications, a continuous monitoring system (CMS), as specified in 40 CFR Part 63, Subpart S, section 63.453.
2. A CMS shall be operated to measure the temperature in the firebox or in the ductwork immediately downstream of the firebox and before any substantial heat exchange occurs for each thermal oxidizer used to comply with the requirements of section A.I.2.a of this permit. If using a control device specified in sections A.I.2.a.ii.(b) or (c), the permittee shall monitor the parameter specified and the temperature and concentration limits specified.
3. The permittee using a control device, technique, or an alternative parameter other than those specified in 40 CFR Part 63, Subpart S, section 63.453 shall install a CMS and establish appropriate operating parameters to be monitored that demonstrate, to the USEPA Administrator's and Ohio EPA's satisfaction, continuous compliance with the applicable control requirements.

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

4. To establish or reestablish, the value for each operating parameter required to be monitored in sections A.III.1 and A.III.2 of this permit, or to establish appropriate parameters for section A.III.3 of this permit, the permittee shall use the following procedures:
 - a. During the initial performance test or any subsequent performance test, continuously record the operating parameter.
 - 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 USEPA Administrator's and Ohio EPA's approval the rationale for selecting the monitoring parameters necessary to comply with section A.III.3 of this permit.
 - d. The permittee shall provide for the Administrator's and Ohio EPA's approval, the rationale for the selected operating parameter value, and monitoring frequency, and averaging time. 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.
5. No later than April 16, 2001, the permittee shall conduct the following for each enclosure and closed-vent system in section A.I.2.a:
 - 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, demonstrate no detectable leaks measured initially and annually by procedures in accordance with 40 CFR Part 63, Subpart S, section 63.457(d).
 - d. Demonstrate initially and annually that each enclosure opening is maintained at negative pressure as specified in 40 CFR Part 63, Subpart S, section 63.457(e).
 - 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. If an inspection required by section A.III.5 identifies visible defects in ductwork, piping, enclosures or connections to covers, or if an instrument reading of 500 parts per million by volume or greater above background is measured, or if enclosure openings are not maintained at negative pressure, then the following corrective actions shall be taken as soon as practicable:
 - a. a first effort to repair or correct the closed-vent system shall be made as soon as practicable but no later than 5 calendar days after the problem is identified; and
 - b. the repair or corrective action shall be completed no later than 15 calendar days after the problem is identified.

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

7. No later than April 16, 2001, the permittee shall prepare and maintain a site-specific inspection plan including a drawing or schematic of the components of applicable affected equipment 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.
8. The permittee shall record the CMS parameters specified in 40 CFR Part 63, Subpart S, section 63.453 and meet the requirements of section A.III.9 of this permit for any new affected process equipment or pulping process condensate stream that becomes subject to the standards in 40 CFR Part 63, Subpart S due to a process change or modification.
9. No later than April 16, 2001, the permittee shall comply with all other monitoring and recordkeeping requirements of 40 CFR Part 63, Subpart A, as specified in 40 CFR Part 63, Subpart S, Table 1.

IV. Reporting Requirements

1. No later than April 16, 2001, 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. Emission Limitation:

control of total HAP emissions

Applicable Compliance Method:

Unless controlled by a control device listed in sections A.I.2.a.ii.(c) or A.I.2.a.ii.(d), the permittee shall conduct emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 180 days of the compliance date, April 16, 2001, and within 6 months of permit renewal.
- b. The emission testing shall be conducted to demonstrate compliance with the HAP emissions limitation as specified in 40 CFR Part 63, Subpart S.
- c. Test method(s) and procedures identified in 40 CFR Part 63, Subpart S, section 63.457 and 40 CFR Part 63, Subpart A, section 63.7 shall be employed to demonstrate compliance with the HAP emissions limitation.
- d. The test(s) 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)

Personnel from the USEPA and the Ohio EPA Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report, which includes the analysis of samples, determination of emissions and raw data, 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 test(s). The results of the performance test shall be submitted as part of the notification of compliance status. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA District Office.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Southeast District Office and the USEPA Administrator. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's refusal to accept the results of the emission test(s).

In the event the permittee is unable to conduct the performance test on the date specified in the notification due to unforeseeable circumstances beyond his or her control, the permittee shall notify the USEPA Administrator and the Ohio EPA Southeast District Office within 5 days prior to the scheduled performance test date and specify the date when the performance test is rescheduled.

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: Hydropulper (P009)

Activity Description: Used to process recycled fiber for use in the papermachines

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>
hydropulper	none	none See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a This emissions unit is an existing stationary source (installed in 1971) 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

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 Plant (P010)

Activity Description: Treats the Mill's wastewater prior to discharge to the river

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 plant	none	none See A.I.2.a below.

2. Additional Terms and Conditions

- 2.a This emissions unit is an existing stationary source (installed in 1971) 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

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: Black Liquor Tanks (T004)

Activity Description: Currently used to store weak liquor, overflow, & heavy liquor [originally permitted as T001, T002, T003]

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>
black liquor tanks	none	none
		See A.I.2.a below.

2. **Additional Terms and Conditions**

- 2.a The permittee shall not store any volatile photochemically reactive materials, as defined in OAC 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 deviation (excursion) reports that identify any time 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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