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Facility Name: **MIAMI VALLEY PAPER COMPANY**

Application Number: **14-4515**

Date: **July 1, 1998**

**GENERAL PERMIT CONDITIONS**

TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

The proposed source(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of Ohio Administrative Code

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(OAC) Rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

#### PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

#### PUBLIC DISCLOSURE

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC Rule 3745-49-03.

#### APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

#### BEST AVAILABLE TECHNOLOGY

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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PERMIT TO OPERATE APPLICATION

A Permit to Operate application must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

NINETY DAY OPERATING PERIOD

The facility will be permitted to operate during a 90-day period in accordance with OAC Rule 3745-35-02(C)(4)(b). The purpose of this period of operation is to fulfill the performance tests conditions used in the determination of compliance with the provisions of this Permit to Install or other applicable Ohio EPA rules.

SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies.

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AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Miami Valley Paper Company, Inc** located in **Warren** County. The emissions units listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

Ohio EPA Source Number	Source Identification Description	BAT Determination	Applicable Federal & OAC Rules	*The emission limitation established by this rule is less stringent than that established by 3745-31-05 (BAT)
K001	2-station paper coating machine with drying ovens	VOC content limitation and compliance with daily and annual VOC material usage limits; use of a cyclone to control PM/PM <sub>10</sub> emissions.	3745-31-05 (BAT)	
			3745-17-07 (A) (1)	
			3745-17-11 (B) *	
			3745-21-09 (F) *	
			3745-15-07	

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	Additional
Permit	Special Term
Allowab	and Condition
le Mass	A.2.
Emissio	
ns	Less
and/or	Stringent
Control	
/Usage	Less
<u>Require</u>	Stringent
<u>ments</u>	

See

0.05 lb	Additional
VOC/gal	Special Term
coating	and Condition
,	F.1.

excludi  
ng  
water  
and  
exempt  
solvent  
s; 216  
LBS  
VOC/DAY  
, 17.22  
TPY VOC

0.24 LB  
PM &  
PM-10/H  
R, 1.5  
TPY PM  
& PM-10

See  
Additio  
nal  
Special  
Term  
and  
Conditio  
on B.1.

See

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SUMMARY  
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Organic Compound	17.22
PM	1.05
PM <sub>10</sub>	1.05

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Ohio EPA, Hamilton County, Dept. of Env. Services.**

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**WASTE DISPOSAL**

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

**MAINTENANCE OF EQUIPMENT**

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

**MALFUNCTION/ABATEMENT**

In accordance with OAC RULE 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the **Ohio EPA, Hamilton County, Dept. of Env. Services.**

Except as provided by OAC Rule 3745-15-06(A) (3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

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**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

**A. Applicable Emissions Limitations and Control Requirements**

1. For lbs/day and TPY emissions limitations, see the Air Emissions Summary page of this permit.
2. Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
3. The VOC content of each paper coating shall not exceed 0.05 lb VOC/gal coating, excluding water and exempt solvents, as applied.

**B. Operational Restrictions**

1. The permittee shall not exceed the following defoamer usage limits in this emissions unit:
  - a. 216 lbs of defoamer per day; and
  - b. 34449 lbs of defoamer per year.

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

1. The permittee shall collect and record the following information on a daily basis for the purpose of determining the VOC content for all coatings employed in this emissions unit:
  - a. the name and identification number of each coating;
  - b. the amount of defoamer employed, in pounds;
  - c. the amount of coating, employed, in pounds;

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- d. the water content of each coating, in % by volume;
- e. the density of each coating, as applied, in pounds per gallon; and,
- f. the VOC content (excluding water and exempt solvents) in pounds per gallon of coating for each coating employed. The VOC content excluding water and exempt solvents shall be calculated by the following equation:

$$[ (b)/(c) \times (e) ] / [1 - (d)].$$

2. 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 is not 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.

#### **D. Reporting Requirements**

1. The permittee shall notify the Director (the Ohio EPA, Hamilton County, Dept. of Env. Services) in writing of any daily record showing that the VOC content exceeds the applicable limitation. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Hamilton County, Dept. of Env. Services) within 30 days after the exceedance occurs.
2. The permittee shall submit required reports in the following manner:
  - a. Reports of any required monitoring and/or record keeping information shall be submitted to the Ohio EPA, Southwest District Office, Department of Environmental Services; and,
  - 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,

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operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping 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 Ohio EPA, Hamilton County, Dept. of Env. Services.

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 30, April 30, July 30, and October 30 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. The permittee shall submit annual reports which specify the total VOC emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 30 of each year.

#### **E. Testing Requirements**

1. Compliance with the lbs/day and TPY VOC emissions limitations on the Air Emissions Summary page of this permit shall be demonstrated by multiplying the actual coating application rate, as applied excluding water and exempt solvents, by the actual coating VOC content, excluding water and exempt solvents.
2. USEPA methods 24 and 24A shall be used to determine the VOC content for (a) coatings and (b) flexographic and rotogravure printing lines and related coatings, respectively. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 or 24A cannot be used for a particular coating or ink, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating or ink to demonstrate compliance until the USEPA provides alternative

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analytical procedures or alternative precision statements for Method 24 or 24A.

3. Compliance with the visible particulate emissions limitation in section A.2. of these terms and conditions shall be demonstrated by the methods outlined in OAC 3745-17-03(B) (1).

**F. Miscellaneous Requirements**

1. If probable cause exists indicating the emissions unit is causing or contributing to a nuisance in violation of Ohio Administrative Code rule 3475-15-07, the owner or operator of this emissions unit shall be required to submit and implement a control program which will bring this emissions unit into compliance.