Facility Name: **Sorg Paper Company**
Application Number: **14-4683**
Date: **May 26, 1999**

**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 SOURCES

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 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 (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 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 30 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.

## 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 filed no later than thirty days after commencement of operation.

## SOURCE OPERATION AFTER COMPLETION OF CONSTRUCTION

This facility is permitted to operate each source described by this permit to install for a 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 and regulations.

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| Ohio EPA Source Number | Source Identification Number | BAT Determination | Applicable Federal & OAC Rules | Permit Allowable Mass Emissions and/or Control/Usage Requirements |
|---|---|---|---|---|

AIR EMISSION SUMMARY

The air contaminant emissions units listed below comprise the Permit to Install for **Sorg Paper Company** located in **Butler** 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 | Permit Allowable Mass Emissions and/or Control/Usage Requirements |
|---|---|---|---|---|
| P004 (Mod) | Sorg paper machine no. 1 | BAT is satisfied by use of non-photochemically reactive materials | 3745-15-07 | See General Terms |
| | | | 3745-31-05 | See Additional Special Term and Condition A.1. |
| | | | 3745-21-07(G) | Less stringent* |

* The emissions limit established by this rule is less stringent than those established by Ohio Administrative Code (OAC) rule 3745-31-05(BAT).

SUMMARY
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

| Pollutant | Compound Tons/Year | Previous PTI (14-4404) (TPY) |
|---|---|---|
| Organic | 48 | 15 |

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Net Increase
(TPY)

33

**REPORTING REQUIREMENTS**

Unless otherwise specified, reports required by the Permit to Install need only be submitted to **Hamilton County Dept. of Env. Services, 250 William Howard Taft Road, Cincinnati, OH 45219-2660.**

**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 **Hamilton County Dept. of Env. Services, 250 William Howard Taft Road, Cincinnati, OH 45219-2660.**

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.

## AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

## CONSTRUCTION COMPLIANCE CERTIFICATION

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

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**ADDITIONAL SPECIAL TERMS AND CONDITIONS**

**A. Applicable Emission Limitations and/or Control Requirements**

1. The organic compound (OC) emissions from emissions unit P004 shall not exceed 521.1* pounds per day and is limited to 48 tons per year as a rolling, 12-month summation.

   * The daily emissions limit is based on the maximum capacity of the emissions unit and thus, no daily records are required.

2. The annual formaldehyde wet-strength resin (FWSR) usage shall be limited to 4,032,680 pounds per year on a wet-basis as a rolling, 12-month summation for emissions units P004, P005 and P006 combined. The permittee already has previous records to demonstrate compliance with this rolling, 12-month summation limit.

3. The formaldehyde content of the FWSR shall not exceed 7 percent by weight on a wet basis.

4. The methanol content of the FWSR shall not exceed 1.9 percent by weight on a wet basis.

5. The total OC emitted from dyes shall not exceed 2.18 pounds per air dried tons of finished product(ADTFP).

**B. Operational Restrictions**

1. The use of photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5) is prohibited in emissions unit P004.

**C. Monitoring and Recordkeeping Requirements**

1. 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.

2. The permittee shall collect and record the following information each calender month:

   a. the total FWSR grade production, in air dried tons of finished product (ADTFP) for emissions unit P004;

   b. the total non-FWSR grade production, in air dried tons of finished product (ADTFP) for emissions unit P004;

   c. the total FWSR usage in wet pounds for emissions units P004, P005 and P006;

   d. the updated rolling, 12-month summation of the FWSR usage calculated by adding the FWSR usage from the current month to the FWSR usage of the preceding 11 calendar months for emissions units P004, P005 and P006, combined;

   e. the monthly maximum percent by weight formaldehyde content of the FWSR on a wet basis for emissions units P004, P005 and P006, combined;

   f. the monthly maximum percent by weight methanol content of FWSR on a wet basis for emissions units P004, P005 and P006, combined;

   g. the monthly OC emissions from emissions unit P004 (excluding emissions from use of dyes) shall be calculated according to the following equation:

      Monthly OC emissions (excluding emissions from use of dyes), in lbs/month

      = A * B + C * D

      where:
      A = Non formaldehyde wet-strength resin grade production (ADTFP/month)
      B = Non-FWSR OC Emissions Factor = 0.488 lbs OC/ADTFP
      C = Formaldehyde wet-strength resin grade production (ADTFP/month)
      D = FWSR OC Emissions Factor = [2.9* + 0.488] lbs OC/ADTFP

      * this emission factor of 2.9 lbs OC/ADTFP from

Formaldehyde Wet-Strength Resin is based on 7 percent by weight formaldehyde (wet basis) and 1.9 percent by weight methanol (wet basis). If the permittee switches to a different resin which has OC emissions other than formaldehyde and methanol, the permittee will modify this emission factor and will inform the local air agency within 30 days of switching the resin.

h. the amount of each dye used in emissions unit P004, in pounds per month;

i. the weight percent OC content of each dye used in emissions unit P004;

j. the monthly OC emissions from use of dyes in emissions unit P004, calculated according to the following equation:

= 0.1 *pounds of dye used per month * weight percent OC

where: 0.1 is the assumed amount of dye emitted.

k. the total monthly OC emissions from emissions unit P004 calculated by adding (g) and (j);

l. the updated rolling, 12-month summation of OC emissions from emissions unit P004 calculated by adding the OC emissions of the current month to the OC emissions of the preceding 11 calender months; and,

m. a record of each liquid organic material employed in emissions unit P004 indicating whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).

3. The permittee has agreed to limit emissions of diethylene glycol butyl ether, triethanolamine and diethanolamine to less than one ton per year each to avoid the air toxics policy. The permittee shall maintain annual records of the amount of diethylene

glycol butyl ether, triethanolamine and diethanolamine emitted from the use of dyes.

**D. Reporting Requirements**

1. 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 Hamilton County Dept. of Env. 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, 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 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 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06).

2. The permittee shall submit annual reports which specify the total annual Formaldehyde Wet-Strength Resin Usage for emissions units P004, P005 and P006, combined for the previous calendar year. These reports shall also include the updated rolling, 12-month summation of total Formaldehyde Wet-Strength Resin usage for each calendar month in the reporting period. These reports shall be submitted by January 30 of each year.

3. The permittee shall submit quarterly reports which

identify each month during which the rolling, 12-month summation of OC emissions exceeded the limit established in T&C A.1. The report shall identify the cause for any such exceedance and the steps taken to avoid such exceedances in future. If there are no exceedances then a report is required stating so. These 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.

4. The permittee shall submit annual reports which specify the updated rolling, 12-month total OC emissions for each month from emissions unit P004. These reports shall be submitted by January 30 of each year and shall cover the previous calendar year.

5. The permittee shall submit deviation reports which identify any day when the total OC emitted from the dyes exceeds 2.18 pounds per ADTFP.

## E. Compliance Methods/Testing Requirements

1. Compliance with the limitations outlined in Additional Special Term and Condition A.1, A.2, A.3, A.4, and A.5 shall be demonstrated by the monitoring and recordkeeping in Additional Special Term and Condition C.2.

## F. Miscellaneous Requirements

1. Pursuant to Engineering Guide No. 69, modeling to demonstrate compliance with the Ohio EPA's Air Toxic Policy was not necessary since the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a modification as defined by OAC rule 3745-31-01.

   The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

2. The following terms and conditions shall supersede all the air pollution control requirements for emissions units P004, P005 and P006 contained in the permit to install [application number 14-4404] as issued on March 4, 1998:

   Terms A thru F.

3. The following Additional Special Terms and Conditions will be federally enforceable:
   (A)(1) through (A)(5)
   (C)(1) through (C)(2)(l)
   (D)(1) through (D)(5)
   (E)(1)