

Synthetic Minor Determination and/or Netting Determination

Permit To Install: 08-04881

- A. Source Description Appleton Papers (Appleton) is a paper manufacturing facility located in West Carrollton (Montgomery County), Ohio. Appleton has submitted a PTI application to install an off machine paper coating line. The new coating line (K002) will be used by Appleton to manufacture thermal printing paper and will consist of two water based coating stations and ten natural gas fired dryers.
- B. Facility Emissions and Attainment Status Montgomery County is nonattainment for PM 2.5 and attainment for all other criteria pollutants. Appleton is an existing major source of particulate, SO₂, and NO_x with potential emissions with potential well over 250 tons per year (TPY) for each pollutant. The two coal fired boilers (B002 - 156 MMBtu and B003 - 245 MMBtu) that cause the majority of the air emissions were installed in the late 1960's. Therefore, this project is subject to the major modification thresholds for Major NSR permitting including VOC.
- C. Source Emissions The potential emissions from K002 consist of 71.4 TPY VOC, 22.2 TPY NO_x, 30.1 TPY, CO, and 1.5 TPY PM. SO₂ emissions are de minimis (0.12 TPY). The VOC emissions consist of 70.3 tons from coatings and 1.1 tons from natural gas combustion. All of the NO_x, CO, and PM emissions are from natural gas combustion in the process dryers.

Based on a worst case coating being applied potential VOC emissions are 70.3 TPY (0.0051 lb/gallon x 27,551,000 gallons) which exceeds the 40 TPY major modification threshold for Major NSR permitting. Actual Emissions are more likely to be at an annual emissions rate of 34.1 TPY VOC (0.0026 lb/gallon x 27,551,000 gallons) and Appleton has requested that the 34.1 TPY be established as a rolling 12-month limit.

- D. Conclusion Appleton will be issued a synthetic minor PTI to limit VOC emissions from new emissions unit K002 to 34.1 TPY on a rolling 12-month basis based on VOC usage restrictions. The synthetic minor VOC restrictions will preclude compliance with Major NSR permitting requirements.



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

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

Mailing Address:

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

CERTIFIED MAIL

**RE: DRAFT PERMIT TO INSTALL
MONTGOMERY COUNTY
Application No: 08-04881
Fac ID: 0857190001**

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
JJJJ	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 1/8/2008

Appleton Papers Inc
Nancy McDonnell
1030 W Alex-Bell Rd
West Carrollton, OH 45449-1900

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1000** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

MONTGOMERY COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL 08-04881 FOR AN AIR CONTAMINANT SOURCE
FOR *Appleton Papers Inc*

On 1/8/2008 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Appleton Papers Inc**, located at **1030 W Alex-Bell Rd, West Carrollton, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04881:

Off-machine coater including unwinding standl two coating application stations; twelve air flotation dryers and reel.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280
[(937)225-4435]



**Permit To Install
Terms and Conditions**

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

DRAFT PERMIT TO INSTALL 08-04881

Application Number: 08-04881
Facility ID: 0857190001
Permit Fee: **To be entered upon final issuance**
Name of Facility: Appleton Papers Inc
Person to Contact: Nancy McDonnell
Address: 1030 W Alex-Bell Rd
West Carrollton, OH 45449-1900

Location of proposed air contaminant source(s) [emissions unit(s)]:
**1030 W Alex-Bell Rd
West Carrollton, Ohio**

Description of proposed emissions unit(s):
Off-machine coater including unwinding standl two coating application stations; twelve air flotation dryers and reel.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

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, 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.
- 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 of federally enforceable 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 made to the appropriate Ohio EPA District Office or local air agency. The written

reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. 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. If this permit is for an emissions unit located at a Title V facility, then 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.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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 shall be submitted pursuant to 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 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 re-issuance, or modification
- 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, 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 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. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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 ORC section 3704.08.
 - 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.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. 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.

12. 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.

13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 state-only required 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 (i.e., postmarked) quarterly, 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. 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.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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 the requirements of this permit or cannot meet applicable standards.

6. 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.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. 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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit-To-Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
VOC	35.2
Nitrogen oxides	22.2
Carbon monoxide	30.1
Particulate	1.51

Appleton Papers Inc

PTI Application: 08-04881

Issued: To be entered upon final issuance

Facility ID: 0857190001

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. Emissions Unit K002 contained in this permit is subject to MACT, Subpart JJJJ; the National Emission Standards for Hazardous Air Pollutants from Paper and Other Web Coating. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or contacting the Regional Air Pollution Control Agency (RAPCA).

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (K002) - Off Machine Paper Coating Line with Natural Gas Fired Dryers (No.95 CM)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The nitrogen oxide (NO_x) emissions from natural gas combustion in this emissions unit shall not exceed 5.05 lbs per hour and 22.2 TPY.</p> <p>The carbon monoxide (CO) emissions from natural gas combustion in this emissions unit shall not exceed 6.87 lbs per hour and 30.1 TPY.</p> <p>See A.I.2.a.</p> <p>Compliance with this rule also includes compliance with the requirements of OAC rules 3745-21-09(F), 3745-31-05(C); and 40 CFR Part 63, Subparts A and JJJJ.</p>
OAC rule 3745-31-05(A)(3)(b)	See A.I.2.b.
OAC rule 3745-31-05(C)(Synthetic minor to avoid Major New Source Review)	The volatile organic compound (VOC) emissions from coating use and natural gas combustion in this emissions unit shall not exceed 35.2 TPY based upon a rolling 12-month summation.
OAC rule 3745-21-09(F)	The VOC content of the coatings applied in this emissions unit shall not exceed 2.9 pounds VOC per gallon of coating applied, excluding water and exempt solvents.
40 CFR Part 63, Subpart JJJJ, Paper and Other Web Coating MACT [40 CFR Part 63.3320(b)(3)]	The organic hazardous air pollutant (HAP) emissions from web coating in this emissions unit shall be limited to no more than 8 percent of the mass of solids applied (0.08 kg organic HAP per kg coating solids), as a monthly average.
40 CFR Part 63, Subpart A, General Provisions MACT [40 CFR 63.1-15]	Table 2 of 40 CFR Part 63, Subpart JJJJ identifies the applicable provisions of 40 CFR 63.1-15.

2. Additional Terms and Conditions

- 2.a** The hourly NO_x, and CO emissions limits were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this limitation.
- 2.b** The Best Available Technology (BAT) requirements under OAC rule 3745-31-5(A)(3) do not apply to the particulate emissions from this air contaminant source since the uncontrolled potential to emit for particulate is less than ten TPY.

II. Operational Restrictions

1. The total VOC input from coatings applied on this emissions unit shall not exceed 68,170 pounds based upon a rolling 12-month summation. To ensure enforceability during the first 12 calendar months of operation following issuance of this permit, the permittee shall not exceed the VOC usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative VOC Usage (pounds)</u>
1	5,680
1-2	11,360
2-3	17,040
3-4	22,720
4-5	28,404
5-6	34,085
6-7	39,760
7-8	45,440
8-9	51,130
9-10	56,810
10-11	62,488
11-12	68,170

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual coating and thinning solvent usage limitation shall be based upon a rolling 12-month summation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each day for this emissions unit.
 - a. The company identification for each coating applied.
 - b. The VOC content of each coating, as applied, in pounds of VOC per gallon excluding water and exempt solvents.
2. The permittee shall collect and record the following information each month for this emissions unit.
 - a. The company identification for each coating applied.
 - b. The volume, in gallons, of each coating applied.
 - c. The VOC content of each coating, in pounds per gallon, as applied.
 - d. The VOC usage rate for all coatings, in pounds per month (the sum of b x c for all coatings applied).
 - e. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the VOC usage figures.
3. The permittee shall comply with the record keeping requirements of 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280 - 40 CFR 63.3420).

IV. Reporting Requirements

1. The permittee shall notify the Director (the appropriate Ohio EPA District Office or local air agency) in writing of any daily record showing the VOC content of the coating applied in this emissions unit exceeded 2.9 lbs VOC/gallon, excluding water and exempt solvents. The notification shall include a copy of such record and shall be sent to the Director (the appropriate Ohio EPA District Office or local air agency) within 30 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports which identify the following information; all exceedances of the rolling 12-month limitation on VOC usage; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage levels. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
3. The permittee shall comply with the reporting requirements of 40 CFR Part 63, Subpart JJJJ (40 CFR 63.3280 - 40 CFR 63.3420).

V. Testing Requirements

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

- a. Emissions Limitation -

The VOC content of the coatings applied in this emissions unit shall not exceed 2.9 pounds VOC per gallon of coating applied, excluding water and exempt solvents.

Applicable Compliance Method -

Compliance shall be based on coating formulation data and if requested, VOC content shall be determined according to the requirements of U.S. Reference Method 24 of 40 CFR Part 60, Appendix A. For coating formulations that are prepared using only water and no organic solvents, compliance shall be based on formulation data.

- b. Emissions Limitation -

The total VOC input from coatings applied on this emissions unit shall not exceed 68,170 pounds based upon a rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements in section III.2 of this permit and shall be the sum of the monthly VOC emissions rates for the previous twelve months.

- c. Emission Limitation:

The VOC emissions from this emissions unit shall not exceed 35.2 TPY based upon a rolling 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon the record keeping requirements in section III.2 of this permit and shall be the sum of the monthly emissions rates for the previous 12 months plus 1.1 tons potential VOC emissions from natural gas combustion in the process dryers. VOC emissions from natural gas combustion in the process dryers were determined by multiplying the maximum annual potential fuel combustion rate (398.6 million cubic feet) by the emissions factor of 5.5 lbs VOC per million cubic feet burned (AP-42, Table 1.4-1, 7/98), and dividing by 2000 lbs per ton.

- d. Emission Limitation:

The NOx emissions from natural gas combustion in this emissions unit shall not exceed 5.05 lbs per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum hourly potential fuel combustion rate (0.0455 million cubic feet) by the emissions factor of 111 lbs NOx per million cubic feet burned (emission factor developed by burner manufacturer).

- e. Emission Limitation:

The NO_x emissions from natural gas combustion in this emissions unit shall not exceed 22.2 TPY.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum annual potential fuel combustion rate (398.6 million cubic feet) by the emissions factor of 111 lbs NO_x per million cubic feet burned (emission factor developed by burner manufacturer), and dividing by 2000 lbs per ton.

f. **Emission Limitation:**

The CO emissions from natural gas combustion in this emissions unit shall not exceed 6.87 lbs per hour.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum hourly potential fuel combustion rate (0.0455 million cubic feet) by the emissions factor of 151 lbs CO per million cubic feet burned (emission factor developed by burner manufacturer).

g. **Emission Limitation:**

The CO emissions from natural gas combustion in this emissions unit shall not exceed 30.1 TPY.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum annual potential fuel combustion rate (398.6 million cubic feet) by the emissions factor of 151 lbs CO per million cubic feet burned (emission factor developed by burner manufacturer), and dividing by 2000 lbs per ton.

h. **Emission Limitation:**

The organic HAP emissions from web coating in this emissions unit shall be limited to no more than 8 percent of the mass of solids applied (0.08 kg organic HAP per kg coating solids), as a monthly average.

Applicable Compliance Method:

Compliance shall be based on coating formulation data or U.S. EPA Reference Method 24 of 40 CFR Part 60, Appendix A, in accordance with 40 CFR Part 63, Subpart JJJJ.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 specified in narrative form following the table.

Operations, Property, and/or Equipment - (K002) - Off Machine Coating Line with Natural Gas Fired Dryers (No.95 CM)

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
None	

2. **Additional Terms and Conditions**

- 2.a 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

NEW SOURCE REVIEW FORM B

PTI Number: 08-04881

Facility ID: 0857190001

FACILITY NAME Appleton Papers Inc

FACILITY DESCRIPTION Off-machine coater including unwinding standl two coating application stations; twelve air flotation dryers and reel. CITY/TWP West Carrollton

SIC CODE 2672 SCC CODE 40201301 EMISSIONS UNIT ID K002EMISSIONS UNIT DESCRIPTION Off Machine Coating Line with Natural Gas Fired Dryers (No.95 CM)DATE INSTALLED 1/2008

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter		0.35	1.5	0.35	1.5
PM ₁₀					
Sulfur Dioxide					
Organic Compounds		8.1	35.2	8.1	35.2
Nitrogen Oxides		5.05	22.2	5.05	22.2
Carbon Monoxide		6.87	30.1	6.87	30.1
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? _____ NESHAP? **JJJJ** _____ PSD? _____ OFFSET POLICY? _____

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Water based coatings and compliance 40 CFR Part 63, Subpart JJJJ.

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? _____ \$ _____

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES _____ **XX** _____ NO

IDENTIFY THE AIR CONTAMINANTS: _____