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Facility Name: **Fraser Papers Inc.-West Carrollton Mill**

Application Number: **08-3919**

Date: **October 7, 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 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.

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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

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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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The air contaminant emissions units listed below comprise the Permit to Install for **Fraser Papers Inc.-West Carrollton Mill** located in **Montgomery** 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.

<u>Ohio EPA Source Number</u>	<u>Source Identification Description</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P901	Limestone Storage silo	*	3745-31-05	0.79 lb/hr 3.46 TPY PM
	Transfer of limestone to elevated bins		3745-17-07 (B)	The visible fugitive dust shall not exceed 20 percent opacity as a 3-minute average.
			3745-17-08	The limestone loaded into the elevated bins shall have a moisture content sufficient to minimize or eliminate visible emissions of fugitive dust from the conveyor and transfer point to bins.
	Limestone Silo		3745-31-05	The silo shall be adequately enclosed and vented to the fabric filter; the enclosure

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
P901 cont'd				shall be sufficient to eliminate visible emissions of fugitive dust.  The fabric filter shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible emissions from the outlet, whichever is less stringent.
			3745-17-11	The limit based on this rule is less stringent than the limit above.
P902	Sand storage silo	*	3745-31-05	0.79 lb/hr 3.46 TPY PM
	Transfer of sand to elevated bins		3745-17-07 (B)	The visible fugitive dust shall not exceed 20 percent opacity as a 3-minute average.

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<u>Ohio EPA Source Number</u>	<u>Source Identification Number</u>	<u>BAT Determination</u>	<u>Applicable Federal &amp; OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control/Usage Requirements</u>
			3745-17-08	The sand loaded into the elevated bins shall have a moisture content sufficient to minimize or eliminate visible emissions of fugitive dust from the conveyor and transfer point to bins.
	Sand silo		3745-31-05	The silo shall be adequately enclosed and vented to the fabric filter; the enclosure shall be sufficient to eliminate visible emissions of fugitive dust.  The fabric filter shall achieve an outlet emission rate of not greater than 0.030 grain of particulate emissions per dry standard cubic foot of exhaust gases or there shall be no visible

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emissions from the outlet, whichever is less stringent.

3745-17-11

The limit based on this rule is less stringent than the limit above.

- \* BAT has been determined to be compliance with applicable OAC rules and emission limitations through the use of fabric filter; recordkeeping and reporting requirements.

SUMMARY

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
Particulate	6.92

**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.

**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. Operational Restrictions**

None

**B. Monitoring and/or RecordKeeping Requirements**

For P901 and P902:

1. The permittee shall perform daily checks while the equipment is in operation for any visible particulate emissions from the fabric filter control systems. The presence or absence of any visible emissions from the fabric filter control systems shall be noted in an operations log. If any visible emissions are observed from either system, corrective actions shall be taken to eliminate the visible emissions and these actions shall also be noted in the operations log.
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 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 the permit. Such records may be maintained in computerized form.

**C. Reporting Requirements**

For P901 and P902:

1. The permittee shall submit on a semi-annual basis a report which (a) identifies all days during which any visible particulate emissions were observed from the fabric filter control systems and (b) describes the corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted by January 31 and July 31 of each year to the Director (Regional Air Pollution Control Agency).

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**D. Testing Requirements**

For P901 and P902:

1. Compliance with the emission limitation(s) of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission limitation-  
0.030 gr/dscf

Applicable Compliance Method-

If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-17-03 (B)(7).

- b. Emission limitation-  
0.79 lb/hr Particulate

Applicable Compliance Method-

Compliance shall be determined by totaling the following products:

- i. Transfer to elevated bin:

The maximum hourly production rate of 25 tons/hr, is multiplied by the emission factor, 0.029 lb/ton. The resulting uncontrolled emissions rate is 0.725 lb/hr.

- ii. Unloading to elevated silo(pneumatic):

The maximum hourly production rate of 25 tons/hr, is multiplied by the AP-42 emission factor, 0.27 lb/ton. The resulting uncontrolled emission rate, 6.75 lbs/hr, is then multiplied by a fabric filter control factor of 99% (1 - .99), resulting in a controlled emission rate of 0.0675 lb/hr.

- c. Emission Limitation-  
3.46 TPY Particulate

Applicable Compliance Method-

The 3.46 tons/yr emissions limitation was developed by multiplying the 0.79 lb/hr by a maximum annual

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operating schedule of 8760 hrs/yr and dividing by 2,000 lbs/ton.

- d. Emission Limitation-  
20 percent opacity as a 3-minute average

Applicable Compliance Method-  
Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(3) using the methods and procedures specified in USEPA Method 9.

- e. Emission limitation-  
no visible emissions

Applicable Compliance Method-  
Compliance shall be determined by visible emission performed in accordance with OAC rule 3745-17-03(B)(4) using the methods and procedures specified in USEPA Method 22.