



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

**RE: DRAFT PERMIT TO INSTALL
CLERMONT COUNTY
Application No: 14-4806**

CERTIFIED MAIL

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

DATE: December 8, 1999

Georgia-Pacific Corporation
Patrick W Davis
220 West North Bend Road
Cincinnati, OH 45216

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, 43266-0149.

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 **\$2000** 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.

Very truly yours,

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

cc: USEPA
Kentucky Department of Natural Resources & Environmental Protection
Indiana Office of Air Management
Ohio-Kentucky-Indiana Regional Council of Governments



DRAFT PERMIT TO INSTALL 14-4806

Application Number: 14-4806

APS Premise Number: 1413020453

Permit Fee: **To be entered upon final issuance**

Name of Facility: Georgia-Pacific Corporation

Person to Contact: Patrick W Davis

Address: 220 West North Bend Road
Cincinnati, OH 45216

Location of proposed air contaminant source(s) [emissions unit(s)]:

**Front Wheel Drive near Curliss
Batavia, Ohio**

Description of proposed emissions unit(s):

**5-FLEXOGRAPHIC PRINTING PRESSES, 1-16.329 MMBTU/HR BOILER, AND PNEUMATIC
PAPER SCRAP COLLECTION SYSTEM.**

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

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

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. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install 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.

9. Construction of New Sources(s)

The proposed emissions unit(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 emissions unit(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 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.

10. 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.

11. 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).

12. 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.

13. Source Operation and Operating Permit Requirements 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, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. 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.

15. 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 this Permit to Install.

B. 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>
OC	53.34
PM	14.75
PM ₁₀	7.93
NO _x	14.85
CO	6.01
SO ₂	23.44
Ammonia	5.06

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>A p p l i c a b l e E m i s s i o n s Limitations/Control Measures</u>
Flexographic Printing Press with glue station (Staley Die Cutter)	OAC rule 3745-31-05(A)(3)	3.82 lbs/hr VOC, including cleanup. 7.65 TPY VOC 0.44 lb/hr and 0.87 TPY ammonia
	OAC rule 3745-31-05(D)	7.65 TPY VOC, including cleanup, based upon a rolling, 12-month summation
	OAC rule 3745-21-09 (Y)(1)(a)	See Section A.2.2.c., A.2.2.d., A.2.2.e. and B.1.
	OAC rule 3745-15-07	See Section A.2.2.b.
		See Part I, Term A.7.

2. Additional Terms and Conditions

- 2.a The hourly emission limitation(s) outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.
- 2.b The VOC content of each coating and adhesive employed in this emissions unit shall not exceed the following limitations:
 - a. Forty (40%) percent VOC by volume of the coating and ink, excluding water and exempt solvents; or
 - b. Twenty-five (25%) percent VOC by volume of the volatile matter in the coating and ink.

- 2.c The VOC content of the coatings employed in this emissions unit shall not exceed 1.0 pound per gallon, as applied.
- 2.d The VOC content of the adhesives employed in this emissions unit shall not exceed 0.33 pound per gallon, as applied.
- 2.e The VOC content of the cleanup material employed in this emissions unit shall not exceed 2.5 pounds per gallon.
- 2.f Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of compliant coatings, VOC content limitations, usage limitations and compliance with the Air Toxics Policy.

B. Operational Restrictions

- 1. The maximum annual usage rates for emissions unit K001 shall not exceed 14,000 gallons of coatings, 1,200 gallons of adhesives, and 360 gallons of cleanup material. The annual usage limits are based upon a rolling, 12-month summation of the usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the usage limits specified in the following table:

<u>Months(s)</u>	<u>Maximum Allowable Cumulative Coating Usage In Gallons</u>	<u>Maximum Allowable Cumulative Adhesive Usage In Gallons</u>	<u>Maximum Allowable Cumulative Cleanup Usage In Gallons</u>
1	1,166	100	30
1-2	2,332	200	60
1-3	3,498	300	90
1-4	4,664	400	120
1-5	5,830	500	150
1-6	6,996	600	180
1-7	8,162	700	210
1-8	9,328	800	240
1-9	10,494	900	270
1-10	11,660	1,000	300
1-11	12,826	1,100	330
1-12	14,000	1,200	360

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual usage limits shall be based upon a rolling, 12-month summation of the usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K001:
 - a. The company identification for each coating, adhesive and cleanup material employed;
 - b. The VOC content of each coating, adhesive and cleanup material in pounds per gallon, as applied;
 - c. The ammonia content of each coating, adhesive and cleanup material in percent by weight, as applied;
 - d. The percent VOC by volume of each coating and adhesive (excluding water and exempt solvents), as applied, or the percent VOC by volume of the volatile matter in the coating and adhesive;
 - e. The number of gallons of each coating, adhesive and cleanup material employed;
 - f. The updated rolling, 12-month summation of usage rates for the coatings, adhesives, and cleanup materials employed in gallons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all the months since the issuance of the PTI;
 - g. The total combined VOC emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons per month [the sum of (b) times (e) for each coating, adhesive and cleanup material];
 - h. The updated rolling, 12-month summation for the total combined VOC emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months;
 - i. The total combined ammonia emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons per month [the sum of (c) times (e) times the density for each coating, adhesive and cleanup material].
2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings, adhesives and cleanup materials. The notification shall include a copy of such record and shall be sent to Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall submit reports which specify the rolling, 12-month summation of VOC emissions and the rolling, 12-month summations of the coatings, adhesives and cleanup materials used in emission unit K001 for each month.
3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emissions and usage limitations specified in the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitations:

VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied and 40 percent VOC by volume of the coating or ink, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 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 analytical procedures or alternative precision statements for Method 24A.

b. Emission Limitation:

VOC content of 1.0 lb/gallon for coatings employed;
VOC content of 0.33 lb/gallon for adhesives employed; and
VOC content of 2.5 lbs/gallon for cleanup materials employed.

Applicable Compliance Method:

USEPA Method 24A shall be used to determine the VOC contents of the coatings, adhesives, and cleanup materials. If, pursuant to section 4.3 of method 24A, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternate analytical procedures or alternative precision statements for Method 24A.

c. Emission Limitation:

3.82 lbs/hr VOC, including cleanup

Applicable Compliance Method:

Compliance is determined by multiplying the maximum hourly usage rates of the coating, adhesive, and cleanup material (3.6 gal/hr, 0.3 gal/hr, and 0.05 gal/hr respectively) by their maximum allowable VOC contents and adding the results.

- d. Emission Limitation:
7.65 TPY VOC, including cleanup, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

- e. Usage Limitations:
Less than 14,000 gallons coatings per year;
Less than 1,200 gallons adhesives per year; and
Less than 360 gallons cleanup materials per year.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

- f. Emission Limitation:
0.44 lb/hr ammonia

Applicable Compliance Method:

Compliance is determined by multiplying the maximum hourly usage rates of the coating, adhesive, and cleanup material (3.6 gal/hr, 0.3 gal/hr, and 0.05 gal/hr respectively) by their maximum densities and by their maximum ammonia content (in percent by weight) and adding the results.

- g. Emission Limitation:
0.87 TPY ammonia

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C.1., and shall be the sum of the 12 monthly ammonia emission rates for the calendar year.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: ammonia

TLV (ug/m3): 17,410

Maximum Hourly Emission Rate (lbs/hr): 2.71

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 208.9

MAGLC (ug/m3): 415

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. 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.

The Ohio EPA will not consider any of the above-mentioned as a “modification” requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a “modification” under OAC Chapter 3745-31;
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

2. The following terms and conditions of this permit are federally enforceable, pursuant to OAC rule 3745-31-05(D): A.2.2.b., A.2.2.c., A.2.2.d., A.2.2.e., B.1., C.1., D.1., D.2., and E.1.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Flexographic printing press with glue station (Martin "Mini" Flexographic)	OAC rule 3745-31-05(A)(3)	4.72 lbs/hr VOC, including cleanup.
		10.66 TPY VOC
		0.50 lb/hr and 1.1 TPY ammonia
	OAC rule 3745-31-05(D)	10.66 TPY VOC, including cleanup, based upon a rolling, 12-month summation
		See Section A.2.2.c, A.2.2.d, A.2.2.e and B.1.
	OAC rule 3745-21-09 (Y)(1)(a)	See Section A.2.2.b.
	OAC rule 3745-15-07	See Part I, Term A.7.

2. Additional Terms and Conditions

- 2.a The hourly emission limitation(s) outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.
- 2.b The VOC content of each coating and adhesive employed in this emissions unit shall not exceed the following limitations:
 - a. Forty (40%) percent VOC by volume of the coating and ink, excluding water and exempt solvents; or
 - b. Twenty-five (25%) percent VOC by volume of the volatile matter in the coating and ink.

- 2.c The VOC content of the coatings employed in this emissions unit shall not exceed 1.0 pound per gallon, as applied.
- 2.d The VOC content of the adhesives employed in this emissions unit shall not exceed 0.33 pound per gallon, as applied.
- 2.e The VOC content of the cleanup material employed in this emissions unit shall not exceed 2.5 pounds per gallon.
- 2.f Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of compliant coatings, VOC content limitations, usage limitations and compliance with the Air Toxics Policy.

B. Operational Restrictions

- 1. The maximum annual usage rates for emissions unit K002 shall not exceed 20,000 gallons of coatings, 1,300 gallons of adhesives, and 360 gallons of cleanup material. The annual usage limits are based upon a rolling, 12-month summation of the usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the usage limits specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage In Gallons</u>	<u>Maximum Allowable Cumulative Adhesive Usage In Gallons</u>	<u>Maximum Allowable Cumulative Cleanup Usage In Gallons</u>
1	1,660	108	30
1-2	3,332	216	60
1-3	4,998	324	90
1-4	6,664	432	120
1-5	8,330	540	150
1-6	9,996	648	180
1-7	11,662	756	210
1-8	13,328	864	240
1-9	14,994	972	270
1-10	16,660	1,080	300
1-11	18,326	1,188	330
1-12	20,000	1,300	360

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual usage limits shall be based upon a rolling, 12-month summation of the usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K002:
 - a. The company identification for each coating, adhesive and cleanup material employed;
 - b. The VOC content of each coating, adhesive and cleanup material in pounds per gallon, as applied;
 - c. The ammonia content of each coating, adhesive and cleanup material in percent by weight, as applied;
 - d. The percent VOC by volume of each coating and adhesive (excluding water and exempt solvents), as applied, or the percent VOC by volume of the volatile matter in the coating and adhesive;
 - e. The number of gallons of each coating, adhesive and cleanup material employed;
 - f. The updated rolling, 12-month summation of usage rates for the coatings, adhesives, and cleanup materials employed in gallons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all the months since the issuance of the PTI;
 - g. The total combined VOC emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons per month [the sum of (b) times (e) for each coating, adhesive and cleanup material];
 - h. The updated rolling, 12-month summation for the total combined VOC emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months;
 - i. The total combined ammonia emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons per month [the sum of (c) times (e) times the density for each coating, adhesive and cleanup material].

2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings, adhesives or cleanup materials. The notification shall include a copy of such record and shall be sent to Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall submit and the rolling, 12-month summations of the coatings, adhesives and cleanup materials used in emission unit K002 for each month.
3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emissions and usage limitations specified in the terms and conditions of this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitations:
VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied and 40 percent VOC by volume of the coating or ink, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 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 analytical procedures or alternative precision statements for Method 24A.

- b. Emission Limitation:
VOC content of 1.0 lb/gallon for coatings employed;
VOC content of 0.33 lb/gallon for adhesives employed; and
VOC content of 2.5 lbs/gallon for cleanup materials employed.

Applicable Compliance Method:

USEPA Method 24A shall be used to determine the VOC contents of the coatings, adhesives, and cleanup materials. If, pursuant to section 4.3 of method 24A, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternate analytical procedures or alternative precision statements for Method 24A.

- c. Emission Limitation:
4.72 lbs/hr VOC, including cleanup

Applicable Compliance Method:

Compliance is determined by multiplying the maximum hourly usage rates of the coating, adhesive, and cleanup material (4.5 gal/hr, 0.3 gal/hr, and 0.05 gal/hr respectively) by their maximum allowable VOC contents and adding the results.

- d. Emission Limitation:
10.66 TPY VOC, including cleanup, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

- e. Usage Limitations:
Less than 20,000 gallons coatings per year;
Less than 1,300 gallons adhesives per year; and
Less than 360 gallons cleanup materials per year.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

- f. Emission Limitation:
0.50 lb/hr ammonia

Applicable Compliance Method:

Compliance is determined by multiplying the maximum hourly usage rates of the coating, adhesive, and cleanup material (4.5 gal/hr, 0.3 gal/hr, and 0.05 gal/hr respectively) by their maximum densities and by their maximum ammonia content (in percent by weight) and adding the results.

- g. Emission Limitation:
1.1 TPY ammonia

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C.1., and shall be the sum of the 12 monthly ammonia emission rates for the calendar year.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: ammonia

TLV (ug/m3): 17,410

Maximum Hourly Emission Rate (lbs/hr): 2.71

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 208.9

MAGLC (ug/m3): 415

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. 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.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a “modification” under OAC Chapter 3745-31;
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

2. The following terms and conditions of this permit are federally enforceable, pursuant to OAC rule 3745-31-05(D): A.2.2.b., A.2.2.c., A.2.2.d., A.2.2.e., B.1., C.1., D.1., D.2., and E.1.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Flexographic Printing Press with glue station (Langston Flexographic)	OAC rule 3745-31-05(A)(3)	7.82 lbs/hr VOC, including cleanup. 11.48 TPY VOC 0.71 lb/hr and 1.19 TPY ammonia
	OAC rule 3745-31-05(D)	11.48 TPY VOC, including cleanup, based upon a rolling, 12-month summation See Section A.2.2.c, A.2.2.d, A.2.2.e. and B.1.
	OAC rule 3745-21-09 (Y)(1)(a)	See Section A.2.2.b.
	OAC rule 3745-15-07	See Part I, Term A.7.

2. Additional Terms and Conditions

- 2.a The hourly emission limitation(s) outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.
- 2.b The VOC content of each coating and adhesive employed in this emissions unit shall not exceed the following limitations:
 - a. Forty (40%) percent VOC by volume of the coating and ink, excluding water and exempt solvents; or
 - b. Twenty-five (25%) percent VOC by volume of the volatile matter in the coating and ink.

- 2.c The VOC content of the coatings employed in this emissions unit shall not exceed 1.0 pound per gallon, as applied.
- 2.d The VOC content of the adhesives employed in this emissions unit shall not exceed 0.33 pound per gallon, as applied.
- 2.e The VOC content of the cleanup material employed in this emissions unit shall not exceed 2.5 pounds per gallon.
- 2.f Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of compliant coatings, VOC content limitations, usage limitations and compliance with the Air Toxics Policy.

B. Operational Restrictions

- 1. The maximum annual usage rates for emissions unit K003 shall not exceed 21,600 gallons of coatings, 1,400 gallons of adhesives, and 360 gallons of cleanup material. The annual usage limits are based upon a rolling, 12-month summation of the usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the usage limits specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage In Gallons</u>	<u>Maximum Allowable Cumulative Adhesive Usage In Gallons</u>	<u>Maximum Allowable Cumulative Cleanup Usage In Gallons</u>
1	1,800	116	30
1-2	3,600	232	60
1-3	5,400	348	90
1-4	7,200	464	120
1-5	9,000	580	150
1-6	10,800	696	180
1-7	12,600	812	210
1-8	14,400	928	240
1-9	16,200	1,044	270
1-10	18,000	1,160	300
1-11	19,800	1,276	330
1-12	21,600	1,400	360

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual usage limits shall be based upon a rolling, 12-month summation of the usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K003:
 - a. The company identification for each coating, adhesive and cleanup material employed;
 - b. The VOC content of each coating, adhesive and cleanup material in pounds per gallon, as applied;
 - c. The ammonia content of each coating, adhesive and cleanup material in percent by weight, as applied;
 - d. The percent VOC by volume of each coating and adhesive (excluding water and exempt solvents), as applied, or the percent VOC by volume of the volatile matter in the coating and adhesive;
 - e. The number of gallons of each coating, adhesive and cleanup material employed;
 - f. The updated rolling, 12-month summation of usage rates for the coatings, adhesives, and cleanup materials employed in gallons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all the months since the issuance of the PTI;
 - g. The total combined VOC emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons per month [the sum of (b) times (e) for each coating, adhesive and cleanup material];
 - h. The updated rolling, 12-month summation for the total combined VOC emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months;
 - i. The total combined ammonia emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons per month [the sum of (c) times (e) times the density for each coating, adhesive and cleanup material].
2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings, adhesives or cleanup materials. The notification shall include a copy of such record and shall be sent to Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall submit reports which specify the rolling, 12-month summation of VOC emissions and the rolling, 12-month summations of the coatings, adhesives and cleanup materials used in emission unit K003 for each month.
3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emissions and usage limitations specified in the terms and conditions of this permit shall be determined in accordance with the following method(s):
 - a. Emission Limitations:
VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied and 40 percent VOC by volume of the coating or ink, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 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 analytical procedures or alternative precision statements for Method 24A.

- b. Emission Limitation:
VOC content of 1.0 lb/gallon for coatings employed;
VOC content of 0.33 lb/gallon for adhesives employed; and
VOC content of 2.5 lbs/gallon for cleanup materials employed.

Applicable Compliance Method:

USEPA Method 24A shall be used to determine the VOC contents of the coatings, adhesives, and cleanup materials. If, pursuant to section 4.3 of method 24A, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternate analytical procedures or alternative precision statements for Method 24A.

- c. Emission Limitation:
7.82 lbs/hr VOC, including cleanup

Applicable Compliance Method:

Compliance is determined by multiplying the maximum hourly usage rates of the coating, adhesive, and cleanup material (7.6 gal/hr, 0.3 gal/hr, and 0.05 gal/hr respectively) by their maximum allowable VOC contents and adding the results.

- d. Emission Limitation:
11.48 TPY VOC, including cleanup, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

- e. Usage Limitations:
Less than 21,600 gallons coatings per year;
Less than 1,400 gallons adhesives per year; and
Less than 360 gallons cleanup materials per year.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

- f. Emission Limitation:
0.71 lb/hr ammonia

Applicable Compliance Method:

Compliance is determined by multiplying the maximum hourly usage rates of the coating, adhesive, and cleanup material (7.6 gal/hr, 0.3 gal/hr, and 0.05 gal/hr respectively) by their maximum densities and by their maximum ammonia content (in percent by weight) and adding the results.

- g. Emission Limitation:
1.19 TPY ammonia

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C.1., and shall be the sum of the 12 monthly ammonia emission rates for the calendar year.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: ammonia

TLV (ug/m3): 17,410

Maximum Hourly Emission Rate (lbs/hr): 2.71

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 208.9

MAGLC (ug/m3): 415

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. 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.

The Ohio EPA will not consider any of the above-mentioned as a “modification” requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a “modification” under OAC Chapter 3745-31;
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

2. The following terms and conditions of this permit are federally enforceable, pursuant to OAC rule 3745-31-05(D): A.2.2.b., A.2.2.c., A.2.2.d., A.2.2.e., B.1., C.1., D.1., D.2., and E.1.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Flexographic Printing Press (Ward Die Cutter)	OAC rule 3745-31-05(A)(3)	5.18 lbs/hr VOC, including cleanup. 11.30 TPY VOC 0.35 lb/hr and 0.75 TPY ammonia
	OAC rule 3745-31-05(D)	11.30 TPY VOC, including cleanup, based upon a rolling, 12-month summation See Section A.2.2.c., A.2.2.d. and B.1.
	OAC rule 3745-21-09 (Y)(1)(a)	See Section A.2.2.b.
	OAC rule 3745-15-07	See Part I, Term A.7.

2. Additional Terms and Conditions

- 2.a The hourly emission limitation(s) outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.
- 2.b The VOC content of each coating employed in this emissions unit shall not exceed the following limitations:
 - a. Forty (40%) percent VOC by volume of the coating and ink, excluding water and exempt solvents; or
 - b. Twenty-five (25%) percent VOC by volume of the volatile matter in the coating and ink.

- 2.c The VOC content of the coatings employed in this emissions unit shall not exceed 1.0 pound per gallon, as applied.
- 2.d The VOC content of the cleanup material employed in this emissions unit shall not exceed 2.5 pounds per gallon.
- 2.e Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of compliant coatings, VOC content limitations, usage limitations and compliance with the Air Toxics Policy.

B. Operational Restrictions

- 1. The maximum annual usage rates for emissions unit K004 shall not exceed 22,000 gallons of coatings, and 240 gallons of cleanup material. The annual usage limits are based upon a rolling, 12-month summation of the usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the usage limits specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage In Gallons</u>	<u>Maximum Allowable Cumulative Cleanup Usage In Gallons</u>
1	1,833	20
1-2	3,666	40
1-3	5,499	60
1-4	7,332	80
1-5	9,165	100
1-6	10,998	120
1-7	12,831	140
1-8	14,664	160
1-9	16,497	180
1-10	18,330	200
1-11	20,163	220
1-12	22,000	240

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual usage limits shall be based upon a rolling, 12-month summation of the usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K004:
 - a. The company identification for each coating and cleanup material employed;
 - b. The VOC content of each coating and cleanup material in pounds per gallon, as applied;
 - c. The ammonia content of each coating and cleanup material in percent by weight, as applied;
 - d. The percent VOC by volume of each coating (excluding water and exempt solvents), as applied, or the percent VOC by volume of the volatile matter in the coating;
 - e. The number of gallons of each coating and cleanup material employed;
 - f. The updated rolling, 12-month summation of usage rates for the coatings and cleanup materials employed in gallons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all the months since the issuance of the PTI;
 - g. The total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (b) times (e) for each coating, adhesive and cleanup material];
 - h. The updated rolling, 12-month summation for the total combined VOC emissions from all coatings and cleanup materials employed, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all the months since the issuance of the PTI;
 - i. The total combined ammonia emissions from all coatings and cleanup materials employed, in pounds or tons per month [the sum of (c) times (e) times the density for each coating, adhesive and cleanup material].
2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and,
 - b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings or cleanup materials. The notification shall include a copy of such record and shall be sent to Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall submit reports which specify the rolling, 12-month summation of VOC emissions and the rolling, 12-month summations of the coatings, and cleanup materials used in emission unit K004 for each month.
3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emissions and usage limitations specified in the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitations:

VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied and 40 percent VOC by volume of the coating or ink, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 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 analytical procedures or alternative precision statements for Method 24A.

b. Emission Limitation:

VOC content of 1.0 lb/gallon for coatings employed; and
VOC content of 2.5 lbs/gallon for cleanup materials employed.

Applicable Compliance Method:

USEPA Method 24A shall be used to determine the VOC contents of the coatings and cleanup materials. If, pursuant to section 4.3 of method 24A, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating,

the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternate analytical procedures or alternative precision statements for Method 24A.

- c. Emission Limitation:
5.18 lbs/hr VOC, including cleanup

Applicable Compliance Method:

Compliance is determined by multiplying the maximum hourly usage rates of the coating and cleanup material (5.1 gal/hr, and 0.03 gal/hr respectively) by their maximum allowable VOC contents and adding the results.

- d. Emission Limitation:
11.30 TPY VOC, including cleanup, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

- e. Usage Limitations:
Less than 22,000 gallons coatings per year; and
Less than 240 gallons cleanup materials per year.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

- f. Emission Limitation:
0.35 lb/hr ammonia

Applicable Compliance Method:

Compliance is determined by multiplying the maximum hourly usage rates of the coating and cleanup material (5.1 gal/hr, and 0.03 gal/hr respectively) by their maximum densities and by their maximum ammonia content (in percent by weight) and adding the results.

- g. Emission Limitation:
0.75 TPY ammonia

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C.1., and shall be the sum of the 12 monthly ammonia emission rates for the calendar year.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: ammonia

TLV (ug/m3): 17,410

Maximum Hourly Emission Rate (lbs/hr): 2.71

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 208.9

MAGLC (ug/m3): 415

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. 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.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

2. The following terms and conditions of this permit are federally enforceable, pursuant to OAC rule 3745-31-05(D): A.2.2.b., A.2.2.c., A.2.2.d., B.1., C.1., D.1., D.2., and E.1.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Flexographic Printing Press with glue station (Langston Saturn III)	OAC rule 3745-31-05	7.82 lbs/hr VOC, including cleanup. 11.46 TPY VOC 0.71 lb/hr and 1.15 TPY ammonia
	OAC rule 3745-31-05(D)	11.46 TPY VOC, including cleanup, based upon a rolling, 12-month summation
	OAC rule 3745-21-09 (Y)(1)(a)	See Section A.2.2.c., A.2.2.d, A.2.2.e. and B.1.
	OAC rule 3745-15-07	See Section A.2.2.b.
		See Part I, Term A.7.

2. Additional Terms and Conditions

- 2.a The hourly emission limitation(s) outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with this limit.
- 2.b The VOC content of each coating and adhesive employed in this emissions unit shall not exceed the following limitations:
 - a. Forty (40%) percent VOC by volume of the coating and ink, excluding water and exempt solvents; or
 - b. Twenty-five (25%) percent VOC by volume of the volatile matter in the coating and ink.

- 2.c The VOC content of the coatings employed in this emissions unit shall not exceed 1.0 pound per gallon, as applied.
- 2.d The VOC content of the adhesives employed in this emissions unit shall not exceed 0.33 pound per gallon, as applied.
- 2.e The VOC content of the cleanup material employed in this emissions unit shall not exceed 2.5 pounds per gallon.
- 2.f Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of compliant coatings, VOC content limitations, usage limitations and compliance with the Air Toxics Policy.

B. Operational Restrictions

- 1. The maximum annual usage rates for emissions unit K005 shall not exceed 21,600 gallons of coatings, 1,300 gallons of adhesives, and 360 gallons of cleanup material. The annual usage limits are based upon a rolling, 12-month summation of the usage figures.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit to install, the permittee shall not exceed the usage limits specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Coating Usage In Gallons</u>	<u>Maximum Allowable Cumulative Adhesive Usage In Gallons</u>	<u>Maximum Allowable Cumulative Cleanup Usage In Gallons</u>
1	1,800	108	30
1-2	3,600	216	60
1-3	5,400	324	90
1-4	7,200	432	120
1-5	9,000	540	150
1-6	10,800	648	180
1-7	12,600	756	210
1-8	14,400	864	240
1-9	16,200	972	270
1-10	18,000	1,080	300
1-11	19,800	1,188	330
1-12	21,600	1,300	360

After the first 12 calendar months of operation following the issuance of this permit to install, compliance with the annual usage limits shall be based upon a rolling, 12-month summation of the usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for emissions unit K005:
 - a. The company identification for each coating, adhesive and cleanup material employed;
 - b. The VOC content of each coating, adhesive and cleanup material in pounds per gallon, as applied;
 - c. The ammonia content of each coating, adhesive and cleanup material in percent by weight, as applied;
 - d. The percent VOC by volume of each coating and adhesive (excluding water and exempt solvents), as applied, or the percent VOC by volume of the volatile matter in the coating and adhesive;
 - e. The number of gallons of each coating, adhesive and cleanup material employed;
 - f. The updated rolling, 12-month summation of usage rates for the coatings, adhesives, and cleanup materials employed in gallons. This shall include the information for the current month and the preceding eleven calendar months. For the first twelve months following the issuance of the permit, this shall be a cumulative total for all the months since the issuance of the PTI;
 - g. The total combined VOC emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons per month [the sum of (b) times (e) for each coating, adhesive and cleanup material];
 - h. The updated rolling, 12-month summation for the total combined VOC emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months;
 - i. The total combined ammonia emissions from all coatings, adhesives and cleanup materials employed, in pounds or tons per month [the sum of (c) times (e) times the density for each coating, adhesive and cleanup material].
2. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. Background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. A copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any monthly record showing the use of noncomplying coatings, adhesives or cleanup materials. The notification shall include a copy of such record and shall be sent to Hamilton County Department of Environmental Services within 30 days following the end of the calendar month.
2. The permittee shall submit reports which specify the rolling, 12-month summation of VOC emissions and the rolling, 12-month summations of the coatings, adhesives and cleanup materials used in emission unit K005 for each month.
3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the emissions and usage limitations specified in the terms and conditions of this permit shall be determined in accordance with the following method(s):

a. Emission Limitations:

VOC content of each coating and ink not to exceed 25 percent VOC by volume of the volatile matter of the coating and ink, as applied and 40 percent VOC by volume of the coating or ink, excluding water and exempt solvents, as applied.

Applicable Compliance Method:

Compliance shall be based upon the record keeping requirements specified in Section C. In accordance with OAC rule 3745-21-04(B)(5), USEPA Method 24A shall be used to determine the VOC contents of the coatings and inks. If, pursuant to section 4.3 of Method 24, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 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 analytical procedures or alternative precision statements for Method 24A.

b. Emission Limitation:

VOC content of 1.0 lb/gallon for coatings employed;
VOC content of 0.33 lb/gallon for adhesives employed; and
VOC content of 2.5 lbs/gallon for cleanup materials employed.

Applicable Compliance Method:

USEPA Method 24A shall be used to determine the VOC contents of the coatings, adhesives, and cleanup materials. If, pursuant to section 4.3 of method 24A, 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24A cannot be used for a particular coating,

the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternate analytical procedures or alternative precision statements for Method 24A.

- c. Emission Limitation:
7.82 lbs/hr VOC, including cleanup

Applicable Compliance Method:

Compliance is determined by multiplying the maximum hourly usage rates of the coating, adhesive, and cleanup material (7.6 gal/hr, 0.3 gal/hr, and 0.05 gal/hr respectively) by their maximum allowable VOC contents and adding the results.

- d. Emission Limitation:
11.46 TPY VOC, including cleanup, based upon a rolling, 12-month summation

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

- e. Usage Limitations:
Less than 21,600 gallons coatings per year;
Less than 1,300 gallons adhesives per year; and,
Less than 360 gallons cleanup materials per year.

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C.1.

- f. Emission Limitation:
0.71 lb/hr ammonia

Applicable Compliance Method:

Compliance is determined by multiplying the maximum hourly usage rates of the coating, adhesive, and cleanup material (7.6 gal/hr, 0.3 gal/hr, and 0.05 gal/hr respectively) by their maximum densities and by their maximum ammonia content (in percent by weight) and adding the results.

- g. Emission Limitation:
1.15 TPY ammonia

Applicable Compliance Method:

Compliance shall be based upon the recordkeeping requirements specified in Section C.1., and shall be the sum of the 12 monthly ammonia emission rates for the calendar year.

F. Miscellaneous Requirements

1. This permit allows the use of materials (typically coatings and cleanup materials) specified by the permittee in the permit to install application for this emissions unit. To fulfill the best available technology requirements of (OAC) rule 3745-31-05 and to ensure compliance with OAC rule 3745-15-07 (Air Pollution Nuisances Prohibited), the emission limitation(s) specified in this permit was (were) established using the Ohio EPA's "Air Toxic Policy" and is (are) based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for each pollutant:

Pollutant: ammonia

TLV (ug/m3): 17,410

Maximum Hourly Emission Rate (lbs/hr): 2.71

Predicted 1-Hour Maximum Ground-Level

Concentration (ug/m3): 208.9

MAGLC (ug/m3): 415

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 the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. Changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. Changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. Changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
- d. 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.

The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:

- a. The change is not otherwise considered a "modification" under OAC Chapter 3745-31;
- b. The permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

- c. Prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

2. The following terms and conditions of this permit are federally enforceable, pursuant to OAC rule 3745-31-05(D): A.2.2.b., A.2.2.c., A.2.2.d., A.2.2.e., B.1., C.1., D.1., D.2., and E.1.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Pneumatic paper scrap collection system with cyclone	OAC rule 3745-31-05(A)(3)	5.46 lbs/hr PM and 13.65 TPY PM
	OAC rule 3745-17-07(A)	2.73 lbs/hr PM10 and 6.83 TPY PM10
	OAC rule 3745-17-11	See Section A.2.2.a. The emissions limitation established by OAC rule 3745-17-11 is less stringent than OAC rule 3745-31-05 (BAT).
	OAC rule 3745-15-07	See Part I, Term A.7.

2. **Additional Terms and Conditions**

- 2.a Visible particulate emissions from the stack for emissions unit P001 shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
- 2.b The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.
- 2.c Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of a cyclone.

B. Operational Restrictions

1. The maximum annual throughput of scrap paper shall not exceed 26,257 tons.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The throughput of scrap paper for the calendar month, in tons.
 - b. The monthly PM emissions, in tons, calculated by multiplying the scrap paper throughput above by an emission factor of 1.04 lbs PM/ton (from cyclone manufacturer data) and by dividing by 2,000 lbs/ton.
 - c. The monthly PM10 emissions, in tons, calculated by multiplying the scrap paper throughput above by an emission factor of 0.52 lb PM10/ton (from cyclone manufacturer data) and by dividing by 2,000 lbs/ton.

D. Reporting Requirements

1. The permittee shall submit annual reports to Hamilton County Department of Environmental Services that identify any exceedances of the annual scrap paper throughput limitation, as well as the corrective actions that were taken to achieve compliance. If no exceedances occurred, then the permittee shall state so in the report. These reports shall be submitted by January 31 of each year.
2. The permittee shall submit annual reports which specify the total PM/PM10 emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the PM/PM10 emission and throughput limits shall be determined by the record keeping and calculation methodology specified in Section C.1.
2. If testing is required to determine compliance with the allowable PM/PM10 emission limitations, then testing shall be conducted using the following methods:
 - a. For PM: Method 5 of 40 CFR Part 60, Appendix A shall be used.
 - b. For PM10: Method 201 of 40 CFR Part 51, Appendix M shall be used.
3. Compliance with the visible stack particulate emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

F. Miscellaneous Requirements

None.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]

A. 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
16.329 MMBtu/hr natural gas, No. 2 oil, and propane fired boiler	OAC rule 3745-31-05(A)(3)	0.208 lb/MMBtu and 14.85 TPY NOx
		0.084 lb/MMBtu and 6.01 TPY CO
		0.015 lb/MMBtu and 1.1 TPY PM/PM10
		0.328 lb/MMBtu and 23.44 TPY SO2
		0.011 lb/MMBtu and 0.79 TPY OC
	OAC rule 3745-15-07	See Part I, Term A.7.
	OAC rule 3745-17-07 (A)(1)	See Section A.2.2.a.
	OAC rule 3745-17-10 (B)(1)	Less stringent than the limit established by OAC rule 3745-31-05 (BAT).
	40 CFR Part 60 Subpart Dc	See Sections C.1., C.2., D.1. and D.2.

2. Additional Terms and Conditions

- 2.a Visible particulate emissions from the stack for emissions unit B001 shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.
- 2.b The lb/MMBtu and TPY limitations specified in this permit were established to reflect the potential to emit for the emissions unit. Therefore, it is not necessary to develop record keeping and reporting requirements to ensure compliance with these limitations.

- 2.c The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.d Compliance with OAC rule 3745-31-05 shall be demonstrated by the use of propane, natural gas and #2 fuel oil.

B. Operational Restrictions

- 1. The emissions unit shall be restricted to the use of natural gas, No. 2 oil, or propane at all times.
- 2. The permittee shall install, operate and maintain low-NOx burners at all times when operating this emissions unit.
- 3. The quality of the oil burned in this emissions unit shall meet the following specifications on an “as received” basis:

A sulfur content not to exceed 0.3% which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.328 pound sulfur dioxide/MMBtu actual heat input.

Compliance with the above-mentioned specifications shall be determined by using the analytical results provided by the permittee or oil supplier for each shipment of oil.

C. Monitoring and/or Recordkeeping Requirements

- 1. When burning No. 2 fuel oil, the permittee shall maintain records of fuel supplier certifications which include the following information:
 - a. The name of the oil supplier;
 - b. A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR Part 60.41c.; and,
 - c. The sulfur content of the oil received.
- 2. The permittee shall record and maintain records of the amounts of each fuel combusted during the day.

D. Reporting Requirements

1. The permittee shall submit a report which includes copies of the fuel supplier certifications, as well as a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel oil combusted during the quarter.
2. Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
 - a. Construction date (no later than 30 days after such date);
 - b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
 - c. Actual start-up date (within 15 days after such date); and,
 - d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC-Permit Management Unit
P.O. Box 163669
Columbus, Ohio 43216-3669

and

Department of Environmental Services
250 William Howard Taft Road
Cincinnati, Ohio 45219

3. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

E. Testing Requirements

1. Compliance with the visible particulate emission limitation shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.
2. Compliance with the lb/MMBtu emission limitations shall be demonstrated by dividing the maximum potential lbs/hr emission rate (from the worst case fuel burned) by the maximum hourly heat input capacity of the emissions unit (16.329 MMBtu/hr). (The maximum lbs/hr emission rates were determined by multiplying the maximum fuel usage rate by the AP-42 emission factors in Chapter 1: External Combustion Sources.)
3. The TPY limitations were developed by multiplying the maximum potential lbs/hr emission rates by the maximum operating schedule of 8760 hrs/yr, and dividing by 2000 lbs/ton. Therefore,

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provided compliance is shown with the lb/MMBtu emission limitations (based on the maximum hourly emission rates), compliance will also be shown with the annual limitations.

F. Miscellaneous Requirements

None.