



G L A T F E L T E R
Beyond Paper

O.E.P.A.
S.E.D.O.

2011 FEB -7 PM 3:22

February 4, 2011

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
Lazarus Government Center
50 West Town Street, Suite 700
Columbus, OH 43215

Bruce Weinberg
Ohio EPA, DAPC
Southeast District Office
2195 Front Street
Logan, OH 43138

Re: Draft Air Pollution Permit-To-Install; Facility ID 0671010028

Dear Mr. Hall and Mr. Weinberg:

P.H. Glatfelter Company – Chillicothe Facility (Glatfelter) is pleased to provide the following comments to the administrative modification to incorporate the U.S. EPA's Regional Haze Regulations best available retrofit technology (BART) requirements into the terms and conditions for emissions units B002 and B003. The Chillicothe Facility and Ohio EPA have worked cooperatively for a number of years on these requirements and Glatfelter appreciates the efforts and considerations of your staff.

Draft PTI Reference (citations apply to both B002 and B003)	Comment
B. Facility-Wide Terms and Conditions; pg. 12; 1.b)(1)f. and (2)a. rule citation and reference language	It may be appropriate to change all language referencing the NOx Budget Trading program to reflect OAC 3745-109. In addition, allowances for B001 should be included as these are allocated until 2014 (p. 12, 2.b)).
2. c)(2) – Reference to B013 as a primary incineration point for LVHC NCGs and stripper off-gasses (SOGs)	No. 6 Wood Residue Boiler is the primary incineration point for HVLC NCGs; however, at this time, the NCG Incinerator is the primary incineration point for LVHC NCGs and SOGs.
(2) e)(1), e)(4), e)(5) – "...the permittee shall submit reports within one month following the end of each calendar quarter..."; "Each report shall be submitted within 30 days..."; "...shall submit reports within one month..."	The suggested language is "...the permittee shall submit reports by January 31, April 30, July 31, and October 31...". This language is consistent with the quarterly excess emission reports in the same section of these draft PTIs as well as the facility's other Title V Permit requirements.

As we have previously discussed with the Agency, Glatfelter is concerned with applicable proposed regulations, specifically Boiler MACT, and how their requirements may impact the

compliance strategy as well as the implementation schedule of BART. Glatfelter will continue to work with the Agency as these regulations evolve and the BART strategy is developed.

Glatfelter appreciates your consideration of these comments and looks forward to working with Ohio EPA on implementation of these requirements. Glatfelter reserves the right to submit future comments on the regional haze regulations for B002 and B003 as appropriate.

Please also note that we have a new mailing address:

P.H. Glatfelter Company – Chillicothe Facility
232 East 8th Street
Chillicothe, OH 45601

If you have any questions concerning these comments, please contact me at 740.772.3387.

Sincerely,



Kathy Wiedeman
Director, Environmental, Health and Safety

KAW:tc
File 3.28.1
Hall – UPS 1Z 476 298 03 9517 5253
Weinberg – UPS 1Z 476 298 03 9619 2643

c: Skip Missimer – Global Director, Environmental Affairs