



**Environmental  
Protection Agency**

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

February 16, 2011

Kathy Wiedeman, Director  
Environmental, Health and Safety  
P.H. Glatfelter Company  
Chillicothe Facility  
232 East 8<sup>th</sup> Street  
Chillicothe, OH 45601

Re: Comments on draft Permit-to-Install P0103673; Facility I.D. 0671010028

Dear Ms. Wiedeman:

Your comments on the draft administrative modification of PTI P0103673 were received by our office on February 7, 2011. The statements below are provided in response to your comments.

*NOx Budget Trading Program Issues:*

We cannot remove the OAC Chapter 3745-14 (NOx SIP call) requirements as they are being maintained as a support/back up to the temporary federal CAIR program, currently in place, until the final revisions to the temporary CAIR program, or a permanent replacement are promulgated. At that time, Ohio EPA will rescind those portions of OAC Chapter 3745-14 dealing with both EGUs and non-EGUs that were subject to the NOx SIP call.

The NOx Budget Trading Program allowances from OAC Chapter 3745-14 for B001 were not included in this administrative modification of PTI 06-07700 since the administrative change only affected emissions units B002 and B003. The OAC Chapter 3745-14 allocations for B001 are still in effect and are listed in PTI 06-07700.

We considered adding but did not include the OAC Chapter 3745-109 provisions in the draft permit due to the current state of the federal CAIR rule. As mentioned above, we know that the OAC Chapter 3745-109 provisions will replace the OAC Chapter 3745-14 provisions when the federal rules are promulgated. While we hoped to address these provisions in the renewal Title V permit, we can include a reference to the OAC Chapter 3745-109 provisions after the OAC Chapter 3745-14 provisions in the Facility Terms and Conditions section of the permit as follows:

**Note: Ohio EPA DAPC has completed rule amendments for OAC Chapter 3745-14, specifically OAC rule 3745-14-01 and OAC rule 3745-14-06, to facilitate the transition of the affected units from OAC Chapter 3745-14 into the federal Clean Air Interstate Rule (CAIR) program and to begin the process of “sunsetting” the parts of OAC Chapter 3745-14 which will no longer be needed as a result of Ohio’s CAIR rules (OAC Chapter 3745-109). The revised applicability section of OAC Chapter 3745-14 allows the rules to remain available as a backup until court required revisions to the federal CAIR program have been completed. The revision to OAC rule 3745-14-01(C)(2)(a) requires all affected units to be subject to and meet the requirements of Ohio’s CAIR program beginning in 2009. Should U.S. EPA eliminate or suspend the CAIR program, this revision would require these units to revert back and meet the requirements of OAC Chapter 3745-14, provided a NOx allowance tracking system is maintained by U.S. EPA.**

**Clean Air Interstate Rule - OAC Chapter 3745-109**

**The permittee shall ensure that any CAIR NOx, SO2, or NOx ozone season units complies with the requirements of OAC Chapter 3745-109, which includes submitting timely permit applications. The requirements of this rule will be specified in the Title V permit issued to this facility.**

Please let me know if the above language is acceptable or if there is alternate language you would like to propose.

**Primary Incineration Point Issues:**

The following language was taken directly from PTI 06-07700, issued on July 14, 2005: “This emissions unit shall not be taken out of service at the same time, as both emissions units B003 (No.8 Coal Boiler) and B013 (Wood Waste Boiler), except during emergency outages. B013 shall serve as the primary incineration point for High-Volume Low Concentration (HVLC) Non-Condensable Gases (NCGs), Low-Volume High Concentration (LVHC) NCG's and Stripper Off-Gases (SOG's). Either B002 or B003 shall serve as back-up control devices for NCG combustion.”

Based upon your comments, the language in term 2c)(2) should indicate the following:

**This emissions unit shall not be taken out of service at the same time, as emissions units B003 (No.8 Coal Boiler), B013 (Wood Waste Boiler), and NC-101 (NCG Incinerator serving emissions units P014 and P016) except during emergency outages. B013 shall serve as the primary incineration point for high-volume low concentration NCG. NC-101 shall serve as the primary incineration point for low-volume high concentration NCG and stripper off-gases. Either B002 or B003 shall serve as back-up control devices for NCG combustion.**

Please let me know if the above language is correct or if NC-101 has a different mode of operation (i.e., the incinerator has an interlock that shuts down the unit and the NCG are not vented to the atmosphere or if NC-101 uses B013 as its back-up control device). In addition, please note that STARS2 does not currently list B003 as a back-up control device.

Reporting Issues:

They quarterly reporting dates in 2e)(1) and 2e)(5) are correct; however, we can change the language in the first paragraph of each term to remove the reference to "within one month following the end of each calendar quarter" if you believe that the language causes any confusion. It does match with the dates specified at the end of these terms (i.e., one month following the end of the fourth calendar quarter would be January 31, one month following the end of the first calendar quarter would be April 30, etc.).

The language in 2e)(4) is different for a reason. We do not expect the facility to have deviations of this requirement (except during emergency outages); therefore, we have only required a report to be submitted 30 days after the deviation occurs. This requirement is less onerous than the standard quarterly deviation reporting. However, we can change the reporting time frame for term 2e)(4) if you would prefer to have all of the reports for these units submitted on a quarterly basis.

MACT Issue:

We certainly understand your concerns with the forthcoming MACT standards and we will continue to work with you to address any potential conflicts with the proposed BART compliance strategy for the Chillicothe facility. Fortunately, the final BART strategy to achieve the required emissions reductions does not have to be formalized until one year prior to implementation. Hopefully, this will allow us some time to work out any potential conflicts.

Once you have had a chance to review our responses, please contact me (740.380.5257 or [bruce.weinberg@epa.state.oh.us](mailto:bruce.weinberg@epa.state.oh.us)) and let me know if you would like to arrange a conference call to discuss any outstanding issues.

Sincerely,



Bruce D. Weinberg, Manager  
Division of Air Pollution Control  
Southeast District Office

BDW/mlm

cc: Dan Canter, DAPC, SEDO  
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