



State of Ohio Environmental Protection Agency

**Southeast District Office**

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Logan, Ohio 43138

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Ted Strickland, Governor  
Lee Fisher, Lieutenant Governor  
Chris Korteski, Director

February 19, 2010

**RE: Ross County  
PH Glatfelter, 0671010028  
EU # B002, B003, B013, P001, P017,  
B011, & P005  
COMPLIANCE TEST  
Notice of Violation (Non-HPV)**

Kim Lute  
PH Glatfelter  
401 South Paint Street  
Chillicothe, Ohio 45601

Dear Ms. Lute:

On March 31, 2009 through April 8, 2009, PH Glatfelter performed compliance emissions tests at the Chillicothe facility, 401 South Paint Street, on the emissions units (EU) B002, B003, B013, P001, P017, B011 and P005. Ohio EPA received the test report on May 8, 2009. The tests were conducted to meet the requirements of the Title V permit, issued May 10, 2004.

The test report has been reviewed and we have concluded that the test was conducted according to the procedures specified in 40 CFR Part 60, Appendix A, U.S. EPA Test Methods 1-5, 16, and 40 CFR Part 63, Subpart S, Section 457. The results of the test showed the sources B002, B003, B011, B013, P001, P005, and P017 to be in compliance with the applicable Ohio EPA regulations and your facility permit terms and conditions. EU P017 failed on April 2, 2009, and was retested and passed on April 7, 2009. The EU P005, total reduced sulfur test on April 3, 2009, was invalid and was retested and passed on April 8, 2009.

PH Glatfelter permit requirements and test results:

Test Date	Source	Tested emission rate:	Allowable emission rate:	Source operating rate:	Allowable operating rate:
03/31/2009	B002 – Particulate	0.03 lb/mmBtu	0.10 lb/mmBtu	404 mmBtu/hr	422 mmBtu/hr
03/31/2009	B003 – Particulate	0.02 lb/mmBtu	0.10 lb/mmBtu	451 mmBtu/hr	505 mmBtu/hr
04/01/2009	B013 – Particulate	0.039 lb/mmBtu	0.042 lb/mmBtu	338 mmBtu/hr	539 mmBtu/hr
04/02/2009	P001 – Particulate	5.0 lb/hr	19.15 lb/hr	33,192.6 lbs/hr	25,550 lbs/hr

Test Date		Tested emission rate:	Allowable emission rate:	Source operating rate:	Allowable operating rate:
04/02/2009	P017 – ClO <sub>2</sub>	2.73 lbs/hr	0.68 lbs/hr	3,300 lbs/hr	2,917 lbs/hr
04/07/2009	P017 – Cl <sub>2</sub>	0.51 lbs/hr	4.5 lbs/hr	2,964.25 lbs/hr	2,917 lbs/hr
04/07/2009	P017 – ClO <sub>2</sub>	0.11 lbs/hr	0.68 lbs/hr	2,964.25 lbs/hr	2,917 lbs/hr
04/03/2009	B011 – Particulate	8.8 lbs/hr, 0.006 grains/dscf @ 8% O <sub>2</sub>	37.31 lbs/hr, 0.021 grains/dscf @ 8% O <sub>2</sub>	451.86 x 10 <sup>3</sup> lbs/hr	496.6 x 10 <sup>3</sup> lbs/hr
04/03/2009	B011 – CO	12.7 lbs/hr, 17.2 ppm dry @ 8% O <sub>2</sub>	270.2 lbs/hr, 300 ppm dry @ 8% O <sub>2</sub>	451.86 x 10 <sup>3</sup> lbs/hr	496.6 x 10 <sup>3</sup> lbs/hr
04/03/2009	B011 – VOC	1.0 lbs/hr, 0.6 ppm dry as propane @ 8% O <sub>2</sub>	25.7 lbs/hr, 50 ppm dry as propane @ 8% O <sub>2</sub>	451.86 x 10 <sup>3</sup> lbs/hr	496.6 x 10 <sup>3</sup> lbs/hr
04/03/2009	B011 – H <sub>2</sub> SO <sub>4</sub>	0.2 lbs/hr	4.6 lbs/hr	451.86 x 10 <sup>3</sup> lbs/hr	496.6 x 10 <sup>3</sup> lbs/hr
04/03/2009	P005 – Particulate	7.0 lbs/hr, 0.05 g/kg BLS	35.2 lbs/hr, 0.1 g/kg BLS	451.86 x 10 <sup>3</sup> lbs/hr	496.6 x 10 <sup>3</sup> lbs/hr
04/08/2009	P005 – Reduced Sulfur	0.89 lbs/hr, 0.0064 g/kg BLS	1.19 lbs/hr, 0.0084 g/kg BLS	459.15 x 10 <sup>3</sup> lbs/hr	496.6 x 10 <sup>3</sup> lbs/hr

EU P017 had an upset condition during the test, causing run number two to be discarded from the emission average. A third and fourth run were conducted. The three-run average for P017 exceeded the emission limit for chlorine dioxide; however, P017 was re-tested on April 7, 2009 and again was found to be in compliance with the applicable Ohio EPA regulations and your facility permit terms and conditions.

Emissions Unit P005 was tested initially on April 3, 2009. The P005 test was conducted in conditions that were not representative of normal operating conditions and was not accepted. P005 was retested on April 8, 2009 and found to be in compliance with the applicable Ohio EPA regulations and your facility permit terms and conditions.

It was observed during the performance test that the operating rate of Sources P001 and P017 exceeded the permitted/application allowable operating rates. At this time, the agency is requesting you to update any affected PTI's and Title V applications to reflect the correct maximum operating rate. Also, please submit to SEDO, within 30 days of receipt of this letter, an explanation of the increased operating rate, a clarification as to whether the EU's have been modified per OAC rule 3745-31-01 and an explanation of the process conditions/changes made to EU P017 and EU P005 during the failing and passing testing events.

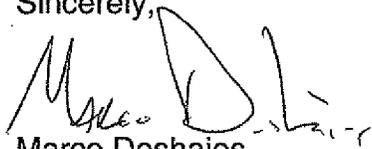
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It was also observed during the performance test that EU B013 operated at 63% of the allowable operating rate (539 mmBtu/hr) and the tested emissions were within 93% of the allowable emission rate for particulate. PH Glatfelter has demonstrated compliance at the lower operating rate; however, due to the emissions approaching the allowable limit specified in your permit, you will need to re-test B013 if you exceed 338 mmBtu/hr to demonstrate continued compliance.

All test information will be used by Ohio EPA personnel for permit processing and source compliance review. Please refer any questions concerning the above requirements to Dan Canter, Ohio EPA Southeast District Office, at 740-380-5263.

Thank you for your cooperation in this matter.

Sincerely,



Marco Deshaies  
Environmental Specialist  
Division of Air Pollution Control

MD/mlm

cc: Dan Canter, DAPC-SEDO (Emissions Unit File Copy)  
Marco Deshaies, DAPC-SEDO  
Bruce Weinberg, DAPC-SEDO  
Steve Lowry, DAPC-SEDO  
Test Report File Copy

