



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

5/15/2013

Certified Mail

JOHN GAUCHE
FAYETTEVILLE-PERRY LOCAL HIGH SCHOOL
501 S APPLE STREET
FAYETTEVILLE, OH 45118

No	TOXIC REVIEW
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0708000057
Permit Number: P0112634
Permit Type: OAC Chapter 3745-31 Modification
County: Brown

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Portsmouth City Health Dept., Air Pollution Unit at (740)353-5156 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Portsmouth



Response to Comments

Facility ID:	0708000057
Facility Name:	FAYETTEVILLE-PERRY LOCAL HIGH SCHOOL
Facility Description:	
Facility Address:	501 S APPLE ST FAYETTEVILLE, OH 45118 Brown County
Permit:	P0112634, Permit-To-Install and Operate - OAC Chapter 3745-31 Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The News Democrat on 04/11/2013. The comment period ended on 05/11/2013.	
Hearing date (if held)	NA
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: None

- a. Comment: None
- b. Response: None



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
FAYETTEVILLE-PERRY LOCAL HIGH SCHOOL**

Facility ID:	0708000057
Permit Number:	P0112634
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	5/15/2013
Effective:	5/15/2013
Expiration:	5/15/2018



Division of Air Pollution Control
Permit-to-Install and Operate
for
FAYETTEVILLE-PERRY LOCAL HIGH SCHOOL

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Final Permit-to-Install and Operate
FAYETTEVILLE-PERRY LOCAL HIGH SCHOOL
Permit Number: P0112634
Facility ID: 0708000057
Effective Date: 5/15/2013

Authorization

Facility ID: 0708000057
Application Number(s): A0046672
Permit Number: P0112634
Permit Description: Two 6.5 mmBtu/hr coal-fired boilers each controlled with a cyclone and over fire air system used for space heat. Chapter 31 modification to limit the annual coal fired to 500 tons per year combined from emissions units B001, B002, and B005.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$400.00
Issue Date: 5/15/2013
Effective Date: 5/15/2013
Expiration Date: 5/15/2018
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

FAYETTEVILLE-PERRY LOCAL HIGH SCHOOL
501 S APPLE ST
FAYETTEVILLE, OH 45118

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

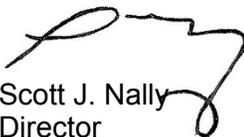
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Portsmouth City Health Dept., Air Pollution Unit
605 Washington Street
3rd Floor
Portsmouth, OH 45662
(740)353-5156

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Final Permit-to-Install and Operate
FAYETTEVILLE-PERRY LOCAL HIGH SCHOOL
Permit Number: P0112634
Facility ID: 0708000057
Effective Date: 5/15/2013

Authorization (continued)

Permit Number: P0112634

Permit Description: Two 6.5 mmBtu/hr coal-fired boilers each controlled with a cyclone and over fire air system used for space heat. Chapter 31 modification to limit the annual coal fired to 500 tons per year combined from emissions units B001, B002, and B005.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	B001
Company Equipment ID:	BOILER #1
Superseded Permit Number:	07-271
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B002
Company Equipment ID:	BOILER #2
Superseded Permit Number:	07-271
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
FAYETTEVILLE-PERRY LOCAL HIGH SCHOOL
Permit Number: P0112634
Facility ID: 0708000057
Effective Date: 5/15/2013

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Portsmouth City Health Dept., Air Pollution Unit in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).



13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Final Permit-to-Install and Operate
FAYETTEVILLE-PERRY LOCAL HIGH SCHOOL
Permit Number: P0112634
Facility ID: 0708000057
Effective Date: 5/15/2013

B. Facility-Wide Terms and Conditions



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



Final Permit-to-Install and Operate
FAYETTEVILLE-PERRY LOCAL HIGH SCHOOL
Permit Number: P0112634
Facility ID: 0708000057
Effective Date: 5/15/2013

C. Emissions Unit Terms and Conditions



1. B001, BOILER #1

Operations, Property and/or Equipment Description:

6.5 mmBtu/hr coal fired boiler controlled with a cyclone and over fire air system used for space heat. Chapter 31 modification to limit the annual coal received to 500 tons per year combined from emissions units B001, B002, and B005.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) **Applicable Emissions Limitations and/or Control Requirements**

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01.	Particulate emissions (PE) shall not exceed 0.21 lb/mmBtu actual heat input and 1.38 tons per year. Particulate emissions less than 10 microns (PM ₁₀) shall not exceed 0.12 lb/mmBtu actual heat input and 0.78 ton per year. Sulfur dioxide (SO ₂) emissions shall not exceed 2.75 lbs/mmBtu actual heat input. Nitrogen oxide (NO _x) emissions shall not exceed 0.37 lb/mmBtu actual heat input and 2.38 tons per year. Carbon monoxide (CO) emissions shall



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		not exceed 0.42 lb/mmBtu actual heat input and 2.75 tons per year. Volatile organic compounds (VOC) emissions shall not exceed 0.05 lb/mmBtu actual heat input and 0.33 ton per year. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06.	See b)(2)b.
c.	OAC rule 3745-31-05(D)	SO ₂ emissions shall not exceed 17.90 tons per year based upon a rolling, 12-month summation.
d.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a 6-minute average, except as provided by the rule. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(3).
e.	OAC rule 3745-17-07(A)(3)	See b)(2)c through b)(2)g.
f.	OAC rule 3745-18-14	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-17-10(C)(1)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA



approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Permit to Install and Operate P0112634 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. Limiting the annual coal received to 500 tons per year.
- ii. Use of a cyclone to control PE and PM₁₀ emissions.
- c. Visible particulate emission limitations established above shall not apply the start-up of the fuel burning equipment for a period of not more than three hours from the moment of start-up.
- d. Visible particulate emission limitations established above shall not apply to the shutdown of fuel burning equipment for a period of not more than three hours.
- e. Visible particulate emission limitations established above shall not apply to the intermittent soot-blowing operations provided a daily record is maintained which documents the date, beginning time and ending time for all intermittent soot-blowing operations.
- f. Visible particulate emission limitations established above shall not apply to the intermittent ash removal operations provided a daily record is maintained which documents the date, beginning time and ending time for all intermittent ash removal operations.
- g. Visible particulate emission limitations established above shall not apply during commencement of increased coal firing from a banked condition for a period not to exceed thirty minutes.

c) Operational Restrictions

- (1) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coal received, upon issuance of this permit. The maximum annual coal received for emissions units B001, B002 and B005, combined, shall not exceed 500 tons, based upon a rolling, 12-month summation of coal received.
- (2) The coal burned in this emissions unit shall have a sulfur content that, when calculated in terms of pounds of SO₂ per million Btu of actual heat input, complies with the allowable SO₂ emission limitation of 2.75 lbs/mmBtu.



d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Standard Practice for Collection of a Gross Sample of Coal and analyze the coal sample for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods to be used to determine the ash content, sulfur content, and heat content shall be the most recent version of: ASTM method D3174, Standard Test Method for Ash in the Analysis Sample of Coal and Coke from Coal; ASTM method D3177, Standard Test Methods for Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Standard Test Methods for Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865 Standard Test Method for Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.
- (2) The permittee shall maintain monthly records of the following information:
 - a. the total quantity of coal received (tons);
 - b. the rolling, 12-month summation of the coal burned (tons);
 - c. the average sulfur content (percent) of the coal received;
 - d. the average ash content of the coal received;
 - e. the average heat content (Btu/lb and mmBtu/ton) of the coal received; and
 - f. the average SO₂ emission rate (lbs SO₂/mmBtu actual heat input) for the coal received.

e) **Reporting Requirements**

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month coal received limitation; and
 - ii. all exceedances of the 2.75 lbs SO₂/mmBtu limit.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and



- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Visible PE shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

- b. Emission Limitation:

PE shall not exceed 0.21 lb/mmBtu actual heat input and 1.38 tons per year.

Applicable Compliance Method:

Compliance shall be determined by multiplying the AP-42 emission factor 11 lbs PE/ton Table 1.1-4 (9/98) by the maximum coal burned per hour, then multiplied by the control efficiency of the cyclone (1-0.50), then divided by the maximum capacity of the boiler. If required, compliance shall be based on stack testing per OAC rule 3745-17-03(B)(9).

Annual compliance shall be determined by the AP-42 emission factor of 11 lbs PE/ton, Table 1.1-4 (9/98), multiplied by the quantity of coal burned per year, multiplied by the control efficiency of the cyclone (1-0.50), then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the short term emission



limitation and the tons of coal received per year restriction then compliance with the annual limitation shall also be demonstrated.

c. Emission Limitation:

PM₁₀ emissions shall not exceed 0.12 lb/mmBtu actual heat input and 0.78 ton per year.

Applicable Compliance Method:

Compliance shall be determined by determined by multiplying the AP-42 emission factor 6.2 lbs PM₁₀/ton Table 1.1-4 (9/98) by the maximum coal burned per hour, then multiplied by the control efficiency of the cyclone (1-0.50), then divided by the maximum capacity of the boiler. If required, compliance shall be based on stack testing in accordance with USEPA Reference Method 201 or 201A of 40 CFR Part 51, Appendix M.

Annual compliance shall be determined by the AP-42 emission factor of 6.2 lbs PM₁₀/ton, Table 1.1-4 (9/98), multiplied by the quantity of coal burned per year, multiplied by the control efficiency of the cyclone (1-0.50) then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the short term emission limitation and the tons of coal received per year restriction then compliance with the annual limitation shall also be demonstrated.

d. Emission Limitation:

SO₂ emissions shall not exceed 2.75 lbs/mmBtu actual heat input.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d) above and the use of the equation contained in OAC rule 3745-18-04(F)(1). If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-18-04(D)(1).

e. Emission Limitation:

SO₂ emissions shall not exceed 17.90 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Annual compliance shall be determined by multiplying the calculated AP-42 emission factor of 71.6 lbs SO₂/ton Table 1.1-3 (9/98), multiplied by the rolling, 12 month summation of coal received then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the short term emission limitation and the tons of coal received per year restriction then compliance with the annual limitation shall also be demonstrated.



f. Emission Limitation:

NO_x emissions shall not exceed 0.37 lb/mmBtu actual heat input and 2.38 tons per year.

Applicable Compliance Method:

Compliance shall be determined by multiplying the AP-42 emission factor 9.5 lbs NO_x/ton Table 1.1-3 (9/98) by the maximum coal burned per hour, then divided by the maximum capacity of the boiler. If required, compliance shall be based on stack testing in accordance with USEPA Reference Method 7 of 40 CFR Part 60, Appendix A.

Annual compliance shall be determined by multiplying the AP-42 emission factor of 9.5 lbs NO_x/ton, Table 1.1-3 (9/98), multiplied by the quantity of coal burned per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the short term emission limitation and the tons of coal received per year restriction then compliance with the annual limitation shall also be demonstrated.

g. Emission Limitation:

CO emissions shall not exceed 0.42 lb/mmBtu actual heat input and 2.75 tons per year.

Applicable Compliance Method:

Compliance shall be determined by multiplying the AP-42 emission factor 11 lbs CO/ton Table 1.1-3 (9/98) by the maximum coal burned per hour, then divided by the maximum capacity of the boiler. If required, compliance shall be based on stack testing in accordance with USEPA Reference Method 10 of 40 CFR Part 60, Appendix A.

Annual compliance shall be determined by multiplying the AP-42 emission factor of 11 lbs CO/ton, Table 1.1-3 (9/98), multiplied by the quantity of coal burned per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the short term emission limitation and the tons of coal received per year restriction then compliance with the annual limitation shall also be demonstrated.

h. Emission Limitation:

VOC emissions shall not exceed 0.05 lb/mmBtu actual heat input and 0.33 ton per year.

Applicable Compliance Method:

Compliance shall be determined by multiplying the AP-42 emission factor 1.3 lbs VOC/ton Table 1.1-19 (9/98) by the maximum coal burned per hour, then divided by the maximum capacity of the boiler. If required, compliance shall be based on stack testing in accordance with USEPA Reference Method 18 of 40 CFR Part 60, Appendix A.



Annual compliance shall be determined by multiplying the AP-42 emission factor of 1.3 lbs VOC/ton, Table 1.1-19 (9/98), multiplied by the quantity of coal burned per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the short term emission limitation and the tons of coal received per year restriction then compliance with the annual limitation shall also be demonstrated.

- g) Miscellaneous Requirements
 - (1) None.



2. B002, BOILER #2

Operations, Property and/or Equipment Description:

6.5 mmBtu/hr coal fired boiler controlled with a cyclone and over fire air system used for space heat. Chapter 31 modification to limit the annual coal fired to 500 tons per year combined from emissions units B001, B002, and B005.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01.	Particulate emissions (PE) shall not exceed 0.21 lb/mmBtu actual heat input and 1.38 tons per year. Particulate emissions less than 10 microns (PM ₁₀) shall not exceed 0.12 lb/mmBtu actual heat input and 0.78 ton per year. Sulfur dioxide (SO ₂) emissions shall not exceed 2.75 lbs/mmBtu actual heat input. Nitrogen oxide (NO _x) emissions shall not exceed 0.37 lb/mmBtu actual heat input and 2.38 tons per year.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Carbon dioxide (CO) emissions shall not exceed 0.42 lb/mmBtu actual heat input and 2.75 tons per year.</p> <p>Volatile organic compounds (VOC) emissions shall not exceed 0.05 lb/mmBtu actual heat input and 0.33 ton per year.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06.	See b)(2)b.
c.	OAC rule 3745-31-05(D)	SO ₂ emissions shall not exceed 17.90 tons per year based upon a rolling, 12-month summation.
d.	OAC rule 3745-17-07(A)	<p>Visible PE shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(3).</p>
e.	OAC rule 3745-17-07(A)(3)	See b)(2)c through b)(2)g.
f.	OAC rule 3745-18-14	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-17-10(C)(1)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S.



EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

Permit to Install and Operate P0112634 for this air contaminant source takes into account the following voluntary restriction (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3):

- i. Limiting the annual coal fired from the facility to 500 tons per year.
 - ii. Use of a cyclone to control PE and PM₁₀ emissions.
 - c. Visible particulate emission limitations established above shall not apply the start-up of the fuel burning equipment for a period of not more than three hours from the moment of start-up.
 - d. Visible particulate emission limitations established above shall not apply to the shutdown of fuel burning equipment for a period of not more than three hours.
 - e. Visible particulate emission limitations established above shall not apply to the intermittent soot-blowing operations provided a daily record is maintained which documents the date, beginning time and ending time for all intermittent soot-blowing operations.
 - f. Visible particulate emission limitations established above shall not apply to the intermittent ash removal operations provided a daily record is maintained which documents the date, beginning time and ending time for all intermittent ash removal operations.
 - g. Visible particulate emission limitations established above shall not apply during commencement of increased coal firing from a banked condition for a period not to exceed thirty minutes.
- c) Operational Restrictions
- (1) This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the coal received, upon issuance of this permit. The maximum annual coal received for emissions units B001, B002 and B005, combined, shall not exceed 500 tons, based upon a rolling, 12-month summation of coal received.
 - (2) The coal burned in this emissions unit shall have a sulfur content that, when calculated in terms of pounds of SO₂ per million Btu of actual heat input, complies with the allowable SO₂ emission limitation of 2.75 lbs/mmBtu.



d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Standard Practice for Collection of a Gross Sample of Coal and analyze the coal sample for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods to be used to determine the ash content, sulfur content, and heat content shall be the most recent version of: ASTM method D3174, Standard Test Method for Ash in the Analysis Sample of Coal and Coke from Coal; ASTM method D3177, Standard Test Methods for Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Standard Test Methods for Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865 Standard Test Method for Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.
- (2) The permittee shall maintain monthly records of the following information:
 - a. the total quantity of coal received (tons);
 - b. the rolling, 12-month summation of the coal burned (tons);
 - c. the average sulfur content (percent) of the coal received;
 - d. the average ash content of the coal received;
 - e. the average heat content (Btu/lb and mmBtu/ton) of the coal received; and
 - f. the average SO₂ emission rate (lbs SO₂/mmBtu actual heat input) for the coal received.

e) **Reporting Requirements**

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. all exceedances of the rolling, 12-month coal received limitation; and
 - ii. all exceedances of the 2.75 lbs SO₂/mmBtu limit.
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and



- d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

Visible PE shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

- b. Emission Limitation:

PE shall not exceed 0.21 lb/mmBtu actual heat input and 1.38 tons per year.

Applicable Compliance Method:

Compliance shall be determined by multiplying the AP-42 emission factor 11 lbs PE/ton Table 1.1-4 (9/98) by the maximum coal burned per hour, then multiplied by the control efficiency of the cyclone (1-0.50), then divided by the maximum capacity of the boiler. If required, compliance shall be based on stack testing per OAC rule 3745-17-03(B)(9).

Annual compliance shall be determined by the AP-42 emission factor of 11 lbs PE/ton, Table 1.1-4 (9/98), multiplied by the quantity of coal burned per year, multiplied by the control efficiency of the cyclone (1-0.50), then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the short term emission



limitation and the tons of coal received per year restriction then compliance with the annual limitation shall also be demonstrated.

c. Emission Limitation:

PM₁₀ emissions shall not exceed 0.12 lb/mmBtu actual heat input and 0.78 ton per year.

Applicable Compliance Method:

Compliance shall be determined by determined by multiplying the AP-42 emission factor 6.2 lbs PM₁₀/ton Table 1.1-4 (9/98) by the maximum coal burned per hour, then multiplied by the control efficiency of the cyclone (1-0.50), then divided by the maximum capacity of the boiler. If required, compliance shall be based on stack testing in accordance with USEPA Reference Method 201 or 201A of 40 CFR Part 51, Appendix M.

Annual compliance shall be determined by the AP-42 emission factor of 6.2 lbs PM₁₀/ton, Table 1.1-4 (9/98), multiplied by the quantity of coal burned per year, multiplied by the control efficiency of the cyclone (1-0.50) then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the short term emission limitation and the tons of coal received per year restriction then compliance with the annual limitation shall also be demonstrated.

d. Emission Limitation:

SO₂ emissions shall not exceed 2.75 lbs/mmBtu actual heat input.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in section d) above and the use of the equation contained in OAC rule 3745-18-04(F)(1). If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-18-04(D)(1).

e. Emission Limitation:

SO₂ emissions shall not exceed 17.90 tons per year based upon a rolling, 12-month summation.

Applicable Compliance Method:

Annual compliance shall be determined by multiplying the calculated AP-42 emission factor of 71.6 lbs SO₂/ton Table 1.1-3 (9/98), multiplied by the rolling, 12 month summation of coal received then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the short term emission limitation and the tons of coal received per year restriction then compliance with the annual limitation shall also be demonstrated.



f. Emission Limitation:

NO_x emissions shall not exceed 0.37 lb/mmBtu actual heat input and 2.38 tons per year.

Applicable Compliance Method:

Compliance shall be determined by multiplying the AP-42 emission factor 9.5 lbs NO_x/ton Table 1.1-3 (9/98) by the maximum coal burned per hour, then divided by the maximum capacity of the boiler. If required, compliance shall be based on stack testing in accordance with USEPA Reference Method 7 of 40 CFR Part 60, Appendix A.

Annual compliance shall be determined by multiplying the AP-42 emission factor of 9.5 lbs NO_x/ton, Table 1.1-3 (9/98), multiplied by the quantity of coal burned per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the short term emission limitation and the tons of coal received per year restriction then compliance with the annual limitation shall also be demonstrated.

g. Emission Limitation:

CO emissions shall not exceed 0.42 lb/mmBtu actual heat input and 2.75 tons per year.

Applicable Compliance Method:

Compliance shall be determined by multiplying the AP-42 emission factor 11 lbs CO/ton Table 1.1-3 (9/98) by the maximum coal burned per hour, then divided by the maximum capacity of the boiler. If required, compliance shall be based on stack testing in accordance with USEPA Reference Method 10 of 40 CFR Part 60, Appendix A.

Annual compliance shall be determined by multiplying the AP-42 emission factor of 11 lbs CO/ton, Table 1.1-3 (9/98), multiplied by the quantity of coal burned per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the short term emission limitation and the tons of coal received per year restriction then compliance with the annual limitation shall also be demonstrated.

h. Emission Limitation:

VOC emissions shall not exceed 0.05 lb/mmBtu actual heat input and 0.33 ton per year.

Applicable Compliance Method:

Compliance shall be determined by multiplying the AP-42 emission factor 1.3 lbs VOC/ton Table 1.1-19 (9/98) by the maximum coal burned per hour, then divided by the maximum capacity of the boiler. If required, compliance shall be based on stack testing in accordance with USEPA Reference Method 18 of 40 CFR Part 60, Appendix A.



Annual compliance shall be determined by multiplying the AP-42 emission factor of 1.3 lbs VOC/ton, Table 1.1-19 (9/98), multiplied by the quantity of coal burned per year, and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the short term emission limitation and the tons of coal received per year restriction then compliance with the annual limitation shall also be demonstrated.

g) Miscellaneous Requirements

- (1) None.