



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

5/29/2013

Certified Mail

C. Mark Miller
Columbus Southerly Wastewater Treatment Plant
910 Dublin Road
Rm 4164
Columbus, OH 43215

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0125040420
Permit Number: P0114499
Permit Type: Initial Installation
County: Franklin

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Columbus Dispatch. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically 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. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,


Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 -Via E-Mail Notification
Ohio EPA-CDO



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor to Avoid PSD for NO_x and SO₂

Netting Determination

2. Source Description:

The City of Columbus-Southerly Wastewater Treatment Plant is located at:

6977 South High Street
Lockbourne, OH 43137

PTIO action is for the initial installation of 3x, 9.4 MMBtu/hr boilers (B043, B044, B045) and the conversion of 3x existing 8.66 MMBtu/hr boilers (B040, B041, B042) to allow the burning of digester gas. The 8.66 MMBtu/hr boilers have been exempt from air permitting but now require a PTI in order to accommodate the usage of boiler gas.

3. Facility Emissions and Attainment Status:

Southerly WWTP is classified as a Major Stationary Source pursuant to Title V operating permit requirements for nitrogen oxides (NO_x), carbon monoxide (CO), and sulfur dioxide (SO₂). Southerly is not a major source for HAPs, exempting these sources from 40 CFR Part 63 Subpart DDDDD and 40 CFR Part 63 JJJJJJ. Southerly WWTP is located in Franklin County.

4. Source Emissions:

These 6 boilers will be part of a synthetic minor permit that limits the amount of digester gas and natural gas burned, as well as CO, NO_x, VOC, PE, and SO₂ emissions.

5. Conclusion:

Issue permit

6. Please provide additional notes or comments as necessary:

Two PTI modifications and a major permit modification to the TV permit will result from this PTI. The PTI modifications will carry the digester gas and SO₂ limitations to the other affected boilers and digesters.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

29.40 tons CO per rolling, 12-month period when burning digester gas for emissions units B040, B041, B042, B043, B044 and B045

36.00 tons NO_x per rolling, 12-month period when burning natural gas for emissions units B040, B041, B042, B043, B044 and B045



1.93 tons VOC per rolling, 12-month period when burning digester gas for emissions units B040, B041, B042, B043, B044 and B045

2.01 tons PE per rolling, 12-month period when burning digester gas for emissions units B040, B041, B042, B043, B044 and B045

43.75 tons SO₂ per rolling, 12-month period when burning digester gas for emissions units B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, B040, B041, B042, B043, B044 and B045

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
Columbus Southerly Wastewater Treatment Plant

Issue Date: 5/29/2013
Permit Number: P0114499
Permit Type: Initial Installation
Permit Description: Three 8.66 MMBtu/hr and three 9.42 MMBtu/hr boilers fired with digester gas or natural gas.
Facility ID: 0125040420
Facility Location: Columbus Southerly Wastewater Treatment Plant
6977 South High Street, Box 95C, Rt#3
Lockbourne, OH 43137-9702
Facility Description: Sewage Treatment Facilities

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Matthew Woods, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778



DRAFT

Division of Air Pollution Control
Permit-to-Install
for
Columbus Southerly Wastewater Treatment Plant

Facility ID:	0125040420
Permit Number:	P0114499
Permit Type:	Initial Installation
Issued:	5/29/2013
Effective:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Columbus Southerly Wastewater Treatment Plant

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Draft Permit-to-Install
Columbus Southerly Wastewater Treatment Plant
Permit Number: P0114499
Facility ID: 0125040420
Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0125040420
Facility Description: Sewerage systems
Application Number(s): A0047626
Permit Number: P0114499
Permit Description: Three 8.66 MMBtu/hr and three 9.42 MMBtu/hr boilers fired with digester gas or natural gas.
Permit Type: Initial Installation
Permit Fee: \$1,200.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 5/29/2013
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

Columbus Southerly Wastewater Treatment Plant
6977 South High Street
Box 95C, Rt#3
Lockbourne, OH 43137-9702

of a Permit-to-Install 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:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted a Permit-to-Install for the 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 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

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0114499
 Permit Description: Three 8.66 MMBtu/hr and three 9.42 MMBtu/hr boilers fired with digester gas or natural gas.

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

Group Name: Headworks Boilers

Emissions Unit ID:	B040
Company Equipment ID:	Boiler #276076
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B041
Company Equipment ID:	Boiler #276077
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B042
Company Equipment ID:	Boiler #276078
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Service Building Boilers

Emissions Unit ID:	B043
Company Equipment ID:	SEV Bldg Boiler No.1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B044
Company Equipment ID:	SEV Bldg Boiler No.2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B045
Company Equipment ID:	SEV Bldg Boiler No.3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install
Columbus Southerly Wastewater Treatment Plant
Permit Number: P0114499
Facility ID: 0125040420
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.



- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Central District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Central District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Central District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.



- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Ohio EPA DAPC, Central District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Central District Office.
- 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 state-only required 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 Ohio EPA DAPC, Central District Office. 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 (i.e., postmarked) quarterly, 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.)

10. 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).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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 cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).



- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.



15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.



Draft Permit-to-Install
Columbus Southerly Wastewater Treatment Plant
Permit Number: P0114499
Facility ID: 0125040420
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install
Columbus Southerly Wastewater Treatment Plant
Permit Number: P0114499
Facility ID: 0125040420
Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.



Draft Permit-to-Install
Columbus Southerly Wastewater Treatment Plant
Permit Number: P0114499
Facility ID: 0125040420
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group -Headworks Boilers: B040,B041,B042,

EU ID	Operations, Property and/or Equipment Description
B040	8.66 MMBtu/hr natural gas/digester gas boiler
B041	8.66 MMBtu/hr natural gas/digester gas boiler
B042	8.66 MMBtu/hr natural gas/digester gas boiler

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) 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	Emissions from B040, B041 and B042, individually, shall not exceed: 1.21 pounds per hour and 5.31 tons per year carbon monoxide (CO) when burning digester gas 1.56 pounds per hour and 6.83 tons per year nitrogen oxide (NO _x) when burning natural gas 0.08 pound per hour and 0.35 tons per year volatile organic compounds (VOC) when burning digester gas 0.08 pound per hour and 0.36 tons per year particulate emissions (PE) when burning digester gas 1.80 pounds per hour and 7.90 tons per year sulfur dioxide (SO ₂) when burning digester gas See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD)	<p>Emissions shall not exceed:</p> <p>29.40 tons CO per rolling, 12-month period when burning digester gas for emissions units B040, B041, B042, B043, B044 and B045</p> <p>36.00 tons NO_x per rolling, 12-month period when burning natural gas for emissions units B040, B041, B042, B043, B044 and B045</p> <p>1.93 tons VOC per rolling, 12-month period when burning digester gas for emissions units B040, B041, B042, B043, B044 and B045</p> <p>2.01 tons PE per rolling, 12-month period when burning digester gas for emissions units B040, B041, B042, B043, B044 and B045</p> <p>43.75 tons SO₂ per rolling, 12-month period when burning digester gas for emissions units B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, B040, B041, B042, B043, B044 and B045</p> <p>See c)(2), c)(3), d)(1), e)(1), and f)(1)h.</p>
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-10(B)(1)	0.020 pound (PE) per million British thermal units (Btu) of actual heat input
f.	OAC rule 3745-18-06	Exempt from d), f), and g), as rated less than 10 MMBtu/hr

(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.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO, NO_x, VOC, PE and SO₂ emissions from these air contaminant sources since the calculated annual emission rate for these pollutants is less than 10 tons/year individually. These emissions units are further restricted by a synthetic minor restriction on the usage of natural gas and digester gas to avoid PSD for NO_x and SO₂.

- c. The hourly allowable emission limitations for this emissions unit were established to reflect the hourly "worst case" potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.
- d. The maximum annual natural gas usage for these emissions units cannot exceed 75.86 (10⁶scf/yr), based upon their potential natural gas usage (these units are further restricted by a group synthetic minor limitation). To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the natural gas usage levels specified in the following table for emissions units B040, B041, and B042, individually:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Natural Gas Usage (10⁶ scf)</u>
1	6.32
1-2	12.64
1-3	18.96
1-4	25.28
1-5	31.6
1-6	37.92
1-7	44.24
1-8	50.56
1-9	56.88
1-10	63.2
1-11	69.52
1-12	75.86

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual natural



gasusage limitation shall be based upon a rolling, 12-month summation of the natural gas usage figures.

- e. The maximum annual digester gas usage for these emissions units cannot exceed 126.44 (10⁶scf/yr), based upon their potential digester gas usage (these units are further restricted by a group synthetic minor limitation). To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the natural gas usage levels specified in the following table for emissions units B040, B041 and B042, individually:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Digester Gas Usage (10⁶ scf)</u>
1	10.53
1-2	21.06
1-3	31.59
1-4	42.12
1-5	52.65
1-6	63.18
1-7	73.71
1-8	84.24
1-9	94.77
1-10	105.3
1-11	115.83
1-12	126.44

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

- c) Operational Restrictions
 - (1) The permittee shall burn only natural gas and/or digester gas in these emissions units.
 - (2) The combined natural gas usage for emissions units B040, B041, B042, B043, B044 and B045 shall not exceed 400 x (10⁶scf) per rolling, 12-month period.
 - (3) The combined digester gas usage for emissions units B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, B040, B041, B042, B043, B044 and B045 shall not exceed 700 x (10⁶scf) per rolling, 12-month period.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain monthly records of the following information:
 - a. the combined natural gas usage for emissions units B040, B041, B042, B043, B044 and B045;



- b. the combined rolling 12-month natural gas usage for emissions units B040, B041, B042, B043, B044 and B045;
- c. the combined digester gas usage for emissions units B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, B040, B041, B042, B043, B044 and B045; and
- d. the combined rolling 12-month digester gas usage for emissions units B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, B040, B041, B042, B043, B044 and B045

The rolling, 12-month emissions of each pollutant are determined by adding the total emissions of each pollutant for each month to the total emissions of each pollutant from the preceding 11 month.

- (2) For each day during which the permittee burns a fuel other than natural gas and/or digester gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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. each period of time, (start date and time to end date and time), when the emissions unit burned a fuel other than natural gas and/or digester gas;
 - ii. any exceedance of the rolling, 12-month natural gas limitation of 400 x (10⁶scf), combined, for emissions units B040, B041, B042, B043, B044 and B045; and
 - iii. any exceedance of the rolling, 12-month digester gas limitation of 700 x (10⁶scf), combined, for emissions units B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, B040, B041, B042, B043, B044 and B045
 - 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 of CDO.

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 particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

b. Emission Limitation:

0.020 pound PE per MMBtu of actual heat input

Applicable Compliance Method:

If required, compliance with this PE limitation shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emission Limitation:

1.21 pounds per hour carbon monoxide

Applicable Compliance Method:

Compliance with the CO limitation is demonstrated through the use of emissions factors published in AP-42, Volume 1, Fifth Edition, Section 1.4 "Natural Gas Combustion" (84 lbs/MMcu.ft.).

If required, compliance with these limitations shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 10.



d. Emission Limitation:

1.56 pounds per hour nitrogen oxide

Applicable Compliance Method:

Compliance with the NO_x limitation is demonstrated through the use of emissions factors derived from the March/April 2009 stack test conducted at the facility (180 lbs/MMcu.ft.).

If required, compliance with these limitations shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 7e.

e. Emission Limitation:

0.08 pound per hour volatile organic compounds

Applicable Compliance Method:

Compliance with the VOC limitation is demonstrated through the use of emissions factors published in AP-42, Volume 1, Fifth Edition, Section 1.4 "Natural Gas Combustion" (5.50 lbs/MMcu.ft.).

If required, compliance with the hourly VOC emission limitation shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Methods 18, 25 or 25A.

f. Emission Limitation:

0.08 pound per hour particulate emissions

Applicable Compliance Method:

Compliance with the PE limitation is demonstrated through the use of emissions factors published in AP-42, Volume 1, Fifth Edition, Table 2.4-5, Section 2.4 "Municipal Solid Waste Landfills" (0.7 methane/digester gas ration, 8.2 lbs PE/MMcu.ft. * 0.7 methane/digester gas = 5.74 lbs PE/MMcu.ft.).

If required, compliance with this PE limitation shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

g. Emission Limitation:

1.80 pounds per hour sulfur dioxide

Applicable Compliance Method:

Compliance with the SO₂ limitation is demonstrated through the use of an emissions factor derived from use a stoichiometric conversing contained permit



application A0047626 using The Ideal Gas Law ($PV = nRT$) yielding a factor of 125 lbs SO_2 /MMcu.ft.

If required, compliance with these limitations shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6.

h. Emission Limitation:

29.40 tons CO per rolling, 12-month period when burning digester gas for emissions units B040, B041, B042, B043, B044 and B045

36.00 tons NO_x per rolling, 12-month period when burning natural gas for emissions units B040, B041, B042, B043, B044 and B045

1.93 tons VOC per rolling, 12-month period when burning digester gas for emissions units B040, B041, B042, B043, B044 and B045

2.01 tons PE per rolling, 12-month period when burning digester gas for emissions units B040, B041, B042, B043, B044 and B045

43.75 tons SO_2 per rolling, 12-month period when burning digester gas for emissions units B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, B040, B041, B042, B043, B044 and B045

Applicable Compliance Method:

Compliance with the rolling, 12-month limitations may be determined by multiplying the actual natural gas/digester gas usage required in d)(1) by the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u>
CO	84lbs/MMcu.ft (digester gas)
NO_x	180lbs/MMcu.ft (natural gas)
VOC	5.50lbs/MMcu.ft (digester gas)
PE	5.74lbs/MMcu.ft (digester gas)
SO_2	125lbs/MMcu.ft. (digester gas)

g) Miscellaneous Requirements

(1) None.



2. Emissions Unit Group -Service Building Boilers: B043,B044,B045,

EU ID	Operations, Property and/or Equipment Description
B043	9.4 MMBtu/hr natural gas/digester gas boiler
B044	9.4 MMBtu/hr natural gas/digester gas boiler
B045	9.4 MMBtu/hr natural gas/digester gas boiler

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) 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	Emissions from B043, B044 and B045 shall not exceed: 1.32 pounds per hour and 5.77 tons per year carbon monoxide (CO) when burning digester gas 1.69 pounds per hour and 7.42 tons per year nitrogen oxide (NO _x) when burning natural gas 0.09 pound per hour and 0.38 tons per year volatile organic compounds (VOC) when burning digester gas 0.09 pound per hour and 0.39 tons per year particulate emissions (PE) when burning digester gas 1.96 pounds per hour and 8.59 tons per year sulfur dioxide (SO ₂) when burning digester gas See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(D) (Synthetic minor to avoid PSD)	<p>Emissions shall not exceed:</p> <p>29.40 tons CO per rolling, 12-month period when burning digester gas for emissions units B040, B041, B042, B043, B044 and B045</p> <p>36.00 tons NO_x per rolling, 12-month period when burning natural gas for emissions units B040, B041, B042, B043, B044 and B045</p> <p>1.93 tons VOC per rolling, 12-month period when burning digester gas for emissions units B040, B041, B042, B043, B044 and B045</p> <p>2.01 tons PE per rolling, 12-month period when burning digester gas for emissions units B040, B041, B042, B043, B044 and B045</p> <p>43.75 tons SO₂ per rolling, 12-month period when burning digester gas for emissions units B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, B040, B041, B042, B043, B044 and B045</p> <p>See c)(2), c)(3), d)(1), e)(1), and f)(1)h.</p>
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
e.	OAC rule 3745-17-10(B)(1)	0.020 pound (PE) per million British thermal units (Btu) of actual heat input
f.	OAC rule 3745-18-06	Exempt from d), f) and g), as rated less than 10 MMBtu/hr

(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.
- c. The hourly allowable emission limitations for this emissions unit were established to reflect the hourly "worst case" potential to emit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.
- d. The maximum annual natural gas usage for these emissions units cannot exceed 82.48 (10⁶scf/yr), based upon their potential natural gas usage (these units are further restricted by a group synthetic minor limitation). To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the natural gas usage levels specified in the following table for emissions units B043, B044, and B045, individually:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Natural Gas Usage (10⁶ scf)</u>
1	6.87
1-2	13.74
1-3	20.61
1-4	27.48
1-5	34.35
1-6	41.22
1-7	48.09
1-8	54.96
1-9	61.83
1-10	68.7
1-11	75.57
1-12	82.48

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

- e. The maximum annual digester gas usage for these emissions units cannot exceed 137.46 (10⁶scf/yr), based upon their potential digester gas usage (these units are further restricted by a group synthetic minor limitation). To ensure enforceability during the first 12 calendar months of operation or the first 12



calendar months following the issuance of this permit, the permittee shall not exceed the natural gas usage levels specified in the following table for emissions units B043, B044 and B045, individually:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Digester Gas Usage (10⁶ scf)</u>
1	11.45
1-2	22.9
1-3	34.35
1-4	45.8
1-5	57.25
1-6	68.87
1-7	80.15
1-8	91.6
1-9	103.05
1-10	114.5
1-11	125.95
1-12	137.46

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

c) Operational Restrictions

- (1) The permittee shall burn only natural gas and/or digester gas in these emissions units.
- (2) The combined natural gas usage for emissions units B040, B041, B042, B043, B044 and B045 shall not exceed 400 x (10⁶scf) per rolling, 12-month period.
- (3) The combined digester gas usage for emissions units B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, B040, B041, B042, B043, B044 and B045 shall not exceed 700 x (10⁶scf) per rolling, 12-month period.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the combined natural gas usage for emissions units B040, B041, B042, B043, B044 and B045;
 - b. the combined rolling 12-month natural gas usage for emissions units B040, B041, B042, B043, B044 and B045;
 - c. the combined digester gas usage for emissions units B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, B040, B041, B042, B043, B044 and B045; and



- d. the combined rolling 12-month digester gas usage for emissions units B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, B040, B041, B042, B043, B044 and B045

The rolling, 12-month emissions of each pollutant are determined by adding the total emissions of each pollutant for each month to the total emissions of each pollutant from the preceding 11 month.

- (2) For each day during which the permittee burns a fuel other than natural gas and/or digester gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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. each period of time, (start date and time to end date and time), when the emissions unit burned a fuel other than natural gas and/or digester gas;
 - ii. any exceedance of the rolling, 12-month natural gas limitation of 400 x (10⁶scf), combined, for emissions units B040, B041, B042, B043, B044 and B045; and
 - iii. any exceedance of the rolling, 12-month digester gas limitation of 700 x (10⁶scf), combined, for emissions units B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, B040, B041, B042, B043, B044 and B045
 - 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 of Ohio EPA.



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 particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

b. Emission Limitation:

0.020 pound PE per MMBtu of actual heat input

Applicable Compliance Method:

If required, compliance with this PE limitation shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emission Limitation:

1.32 pounds per hour carbon monoxide

Applicable Compliance Method:

Compliance with the CO limitation is demonstrated through the use of emissions factors published in AP-42, Volume 1, Fifth Edition, Section 1.4 "Natural Gas Combustion" (84 lbs/MMcu.ft.).

If required, compliance with these limitations shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 10.

d. Emission Limitation:

1.69 pounds per hour nitrogen oxide

Applicable Compliance Method:

Compliance with the NO_x limitation is demonstrated through the use of emissions factors derived from the March/April 2009 stack test conducted at the facility (180 lbs/MMcu.ft.).



If required, compliance with these limitations shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 7e.

e. Emission Limitation:

0.09 pound per hour volatile organic compounds

Applicable Compliance Method:

Compliance with the VOC limitation is demonstrated through the use of emissions factors published in AP-42, Volume 1, Fifth Edition, Section 1.4 "Natural Gas Combustion" (5.50 lbs/MMcu.ft.).

If required, compliance with the hourly VOC emission limitation shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Methods 18, 25 or 25A.

f. Emission Limitation:

0.09 pound per hour particulate emissions

Applicable Compliance Method:

Compliance with the PE limitation is demonstrated through the use of emissions factors published in AP-42, Volume 1, Fifth Edition, Table 2.4-5, Section 2.4 "Municipal Solid Waste Landfills" (0.7 methane/digester gas ration, 8.2 lbs PE/MMcu.ft. * 0.7 methane/digester gas = 5.74 lbs PE/MMcu.ft.).

If required, compliance with this PE limitation shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

g. Emission Limitation:

1.96 pounds per hour sulfur dioxide

Applicable Compliance Method:

Compliance with the SO₂ limitation is demonstrated through the use of an emissions factor derived from use a stoichiometric conversing contained permit application A0047626 using The Ideal Gas Law ($PV = nRT$) yielding a factor of 125 lbs SO₂/MMcu.ft.

If required, compliance with these limitations shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6.



h. Emission Limitation:

29.40 tons CO per rolling, 12-month period when burning digester gas for emissions units B040, B041, B042, B043, B044 and B045

36.00 tons NO_x per rolling, 12-month period when burning natural gas for emissions units B040, B041, B042, B043, B044 and B045

1.93 tons VOC per rolling, 12-month period when burning digester gas for emissions units B040, B041, B042, B043, B044 and B045

2.01 tons PE per rolling, 12-month period when burning digester gas for emissions units B040, B041, B042, B043, B044 and B045

43.75 tons SO₂ per rolling, 12-month period when burning digester gas for emissions units B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, B040, B041, B042, B043, B044 and B045

Applicable Compliance Method:

Compliance with the rolling, 12-month limitations may be determined by multiplying the actual natural gas/digester gas usage required in d)(1) by the following emission factors:

<u>Pollutant</u>	<u>Emission Factor</u>
CO	84lbs/MMcu.ft (digester gas)
NO _x	180lbs/MMcu.ft (natural gas)
VOC	5.50lbs/MMcu.ft (digester gas)
PE	5.74lbs/MMcu.ft (digester gas)
SO ₂	125lbs/MMcu.ft. (digester gas)

g) Miscellaneous Requirements

(1) None.