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

6/12/2013

Certified Mail

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0125040420
Permit Number: P0114498
Permit Type: OAC Chapter 3745-31 Modification
County: Franklin

| | |
|---|---|
| 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 |

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

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

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

Franklin County

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

Issue Date: 6/12/2013
Permit Number: P0114498
Permit Type: OAC Chapter 3745-31 Modification
Permit Description: Chapter 31 modification to include federally enforceable synthetic minor restrictions on digester gas usage and SO2 emissions.
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: | P0114498 |
| Permit Type: | OAC Chapter 3745-31 Modification |
| Issued: | 6/12/2013 |
| 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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# Authorization

Facility ID: 0125040420
Facility Description: Sewerage systems
Application Number(s): A0047632
Permit Number: P0114498
Permit Description: Chapter 31 modification to include federally enforceable synthetic minor restrictions on digester gas usage and SO2 emissions.
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $800.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 6/12/2013
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: P0114498
Permit Description: Chapter 31 modification to include federally enforceable synthetic minor restrictions on digester gas usage and SO2 emissions.

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

**Group Name: Sludge Control Bldg. D/G Boilers**

| | |
|---|---|
| **Emissions Unit ID:** | **B036** |
| Company Equipment ID: | Boiler 1 (SCB) |
| Superseded Permit Number: | P0106650 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **B037** |
| Company Equipment ID: | Boiler 2 (SCB) |
| Superseded Permit Number: | P0106650 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **B038** |
| Company Equipment ID: | Boiler 3 (SCB) |
| Superseded Permit Number: | P0106650 |
| General Permit Category andType: | Not Applicable |
| **Emissions Unit ID:** | **B039** |
| Company Equipment ID: | Boiler 4 (SCB) |
| Superseded Permit Number: | P0106650 |
| General Permit Category andType: | Not Applicable |

# 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 emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, 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, andreportingrequirements 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 enteredupon 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.

# B. Facility-Wide Terms and Conditions

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.

2.

# C. Emissions Unit Terms and Conditions

**1. Emissions Unit Group -Sludge Control Bldg. D/G Boilers: B036,B037,B038,B039,**

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| B036 | Digester gas boiler number 1 |
| B037 | Digester gas boiler number 2 |
| B038 | Digester gas boiler number 3 |
| B039 | Digester gas boiler number 4 |

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 shall not exceed:<br><br>0.90 lb/hr and 0.40 ton per year particulate emissions (PE) while burning digester gas<br><br>1.96 lbs/hr and 8.58 tons per year of sulfur dioxide ($SO_2$) while burning digester gas<br><br>1.69 lbs/hr and 7.42 tons per year nitrogen oxide ($NO_x$) while burning natural gas<br><br>1.32 lbs/hr and 5.78 tons per year carbon monoxide (CO) while burning digester gas<br><br>0.05 lb/hr and 0.23 ton per year volatile organic compounds (VOC) while burning natural gas<br><br>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)<br>Synthetic Minor to avoid PSD | Emissions shall not exceed:<br><br>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<br><br>See b)(2)c., c)(1), d)(2), e)(1), and f)(1)g. |
| 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 Btu of actual heat input. |
| f. | OAC rule 3745-18-06(B) | 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 $SO_2$ 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 digester gas to avoid PSD for $SO_2$.

c. These emissions units have 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 emissions, upon issuance of this permit. The emissions of $SO_2$ from B027, B028, B029, B030, B031, B032, B033, B034, B035, B036, B037, B038, B039, B040, B041, B042, B043, B044 and B045 shall not exceed 43.75 ton, based upon a rolling, 12-month summation of the emissions.

d. The hourly allowable emission limitations for these emissions units were established to reflect the hourly "worst case" potential to emit. Therefore, it is not necessary to develop recordkeeping and/or reporting requirements to ensure compliance with these limits.

c) Operational Restrictions

(1) 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 ($10^6$scf) per rolling, 12-month period.

(2) The permittee shall burn only natural gas and/or digester gas in these emissions units.

d) Monitoring and/or Recordkeeping Requirements

(1) 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 these emissions units.

(2) The permittee shall maintain monthly records of the following information:

a. 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

b. 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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 12-month $SO_2$ emissions limitations;

b. any day when a fuel other than natural gas and/or digester gas was burned in these emission units;

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 quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of 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 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

0.09lb/hr and 0.4 ton per year PM while burning digester gas

Applicable Compliance Method

Compliance with the allowable mass emission rate for particulate emissions may be determined by multiplying the maximum digester gas usage of 15,667scf/hr by an emission factor of 8.2 lbs per million scf and a 0.7 methane/digester gas ratio. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 2.4 Table 2.4-5(11/98).

Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5.

c. Emission Limitation

1.96lbs/hr and 8.58 tons per year $SO_2$ while burning digester gas

Applicable Compliance Method

Compliance with the allowable mass emission rate for sulfur dioxide may be determined by multiplying the maximum digester gas usage of 15,667 scf/hr by an emission factor of 125.0 lbs per million scf. This emission factor is specified in the permit application submitted for PTI 01-01305 as issued final on January 12, 2006.

Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6 or 6C.

d. Emission Limitation

1.69lbs/hr and 7.42 tons per year NOx while burning natural gas

Applicable Compliance Method

Compliance with the allowable mass emission rate for nitrogen oxide emissions may be determined by multiplying the maximum gas usage of 9,415 scf/hr by an emission factor of 180lbs per million scf. This emission factor was established by stack tests performed on these emissions units March 31 through April 1 2009.

Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7 or 7E.

e. Emission Limitation

1.32lbs/hr and 5.78 tons per year CO while burning digester gas

Applicable Compliance Method

Compliance with the allowable mass emission rate for carbon monoxide may be determined by multiplying the maximum digester gas usage of 15,667 scf/hr by an emission factor of 84.0lbs per million scf. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4 Table 1.4-1 (7/98).

Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 6 and 10.

f. Emission Limitation

0.05 lb/hr and 0.23ton per year VOC while burning natural gas

Applicable Compliance Method

Compliance with the allowable mass emission rate for VOC emissions may be determined by multiplying the maximum gas usage of 9,415 scf/hr by an emission factor of 5.5lbs per million scf. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4 Tables 1.4-1 and 1.4-2(7/98).

Compliance with the annual limitations shall be assumed as long as compliance with the hourly limitations is maintained (each annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 25A.

g. Emission Limitation

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 annual limitations shall be based upon the records maintained in section d)(2) and the emission calculation methodology referenced in f)(1)c.

g) Miscellaneous Requirements

(1) None.