



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

7/5/2013

ANDREW KISTLER  
TOLEDO HOSPITAL  
2142 NORTH COVE BLVD  
TOLEDO, OH 43606

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 0448010037  
Permit Number: P0115031  
Permit Type: Renewal  
County: Lucas

Certified Mail

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

Dear Permit Holder:

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

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

**How to appeal this permit**

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

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

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

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

## **How to get an electronic copy of your permit**

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

If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: TDES



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
TOLEDO HOSPITAL**

Facility ID:	0448010037
Permit Number:	P0115031
Permit Type:	Renewal
Issued:	7/5/2013
Effective:	7/5/2013
Expiration:	7/5/2023





**Division of Air Pollution Control  
Permit-to-Install and Operate**

for  
TOLEDO HOSPITAL

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**Final Permit-to-Install and Operate**  
TOLEDO HOSPITAL  
**Permit Number:** P0115031  
**Facility ID:** 0448010037  
**Effective Date:** 7/5/2013

## Authorization

Facility ID: 0448010037  
Application Number(s): A0048075  
Permit Number: P0115031  
Permit Description: PTIO Renewal permit for four (4) number two fuel oil and natural gas-fired boilers  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 7/5/2013  
Effective Date: 7/5/2013  
Expiration Date: 7/5/2023  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

TOLEDO HOSPITAL  
2142 NORTH COVE BLVD  
Toledo, OH 43606

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

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

Toledo Department of Environmental Services  
348 South Erie Street  
Toledo, OH 43604  
(419)936-3015

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

A handwritten signature in black ink, appearing to read "Scott J. Nally".

Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0115031  
 Permit Description: PTIO Renewal permit for four (4) number two fuel oil and natural gas-fired boilers

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

**Emissions Unit ID:** B006  
 Company Equipment ID: #4 BOILER  
 Superseded Permit Number:  
 General Permit Category and Type: Not Applicable

**Group Name: B001, B002, B003**

<b>Emissions Unit ID:</b>	<b>B001</b>
Company Equipment ID:	#1 BOILER
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B002</b>
Company Equipment ID:	#2 BOILER
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B003</b>
Company Equipment ID:	#3 BOILER
Superseded Permit Number:	P0032396
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
TOLEDO HOSPITAL  
**Permit Number:** P0115031  
**Facility ID:** 0448010037  
**Effective Date:** 7/5/2013

## **A. Standard Terms and Conditions**



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

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

**2. Who is responsible for complying with this permit?**

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

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

**3. What records must I keep under this permit?**

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

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

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

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

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

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

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

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



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

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

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

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

**7. What reports must I submit under this permit?**

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

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

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

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

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

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



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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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



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

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

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

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

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

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



**Final Permit-to-Install and Operate**  
TOLEDO HOSPITAL  
**Permit Number:** P0115031  
**Facility ID:** 0448010037  
**Effective Date:** 7/5/2013

## **B. Facility-Wide Terms and Conditions**



1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.
2. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subparts A and Dc: B006. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the Toledo Division of Environmental Services.
3. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. The following emissions units are affected sources: B001, B002, B003, and B006. Although Ohio EPA has determined that this area source MACT (also known as the GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.3.
4. In accordance with engineering guide #61, this facility is exempted from Title V permitting requirements based on presumed inherent physical limitations, i.e. that the facility-wide actual emissions are below twenty percent of any regulated pollutant threshold. To assure compliance with the presumed Title V permitting exemption, the permittee shall maintain the following annual records, demonstrating that the stack emissions of nitrogen oxide (NOx) and sulfur dioxide (SO2) are less than 20 tons per year.
  - a) **Monitoring and/or Recordkeeping Requirements**
    - (1) The permittee shall maintain annual facility-wide records of the following information:
      - a. The volume of natural gas burned facility-wide (in cubic feet.).
      - b. The fuel oil usage rate in B001, B002, B003, and B006.
      - c. The fuel oil usage rate in P001, P002, P003, P006, P007, P008, and P009.
      - d. The actual NOx emissions from burning natural gas and fuel oil demonstrated by:
        - i. multiply the natural gas emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98 (100 pounds of



NO<sub>x</sub> emissions per million standard cubic feet), by the actual annual fuel usage rate (mmscf per year), and then divide by 2,000 pounds per ton.

ii. Boilers - multiply the fuel oil emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1, dated 5/10 (0.020 pound of NO<sub>x</sub> per gallon), by the actual fuel usage rate in each boiler (gallons per year), and then divide by 2,000 pounds per ton.

iii. Diesel engines - multiply the recorded annual fuel usage, in gallons per year, by the fuel oil emission factor specified in USEPA reference document AP 42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.4, Table 3.4 1, dated 10/96 (3.2 pounds of NO<sub>x</sub> per mmBtu), by a heating value of 0.14 mmBtu per gallon, and then divide by 2,000 pounds per ton.

iv. Sum the results of i. + ii + iii.

e. The actual SO<sub>2</sub> emissions from burning natural gas and fuel oil demonstrated by:

i. multiply the natural gas emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2, dated 7/98 (0.6 pound of SO<sub>2</sub> emissions per million standard cubic feet), by the actual fuel usage rate (mmscf per year), and then divide by 2,000 pounds per ton.

ii. Boilers - multiply the fuel oil emission factor specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1, dated 7/98 (0.142S pounds of sulfur dioxide emissions per gallon, where S = 0.5), by the actual fuel usage rate in each boiler (gallons per year), and then divide by 2,000 pounds per ton.

iii. Diesel engines - multiply the recorded annual fuel usage, in gallons per year, by the fuel oil emission factor specified in USEPA reference document AP 42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.4, Table 3.4 1, dated 10/96 (1.01S<sub>1</sub> pounds of NO<sub>x</sub> per mmBtu where S<sub>1</sub>=% sulfur in the fuel), by a heating value of 0.14 mmBtu per gallon, and then divide by 2,000 pounds per ton.

iv. Sum the results of i. + ii. + iii.

4. The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.



5. The permittee shall identify the following information in the Annual Permit Evaluation Reports (PER) in accordance with the monitoring requirements in term B.3.a) above:
  - 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:
    - (1) an identification of the facility-wide NO<sub>x</sub> emissions from B001, B002, B003, B006, P001, P002, P003, P006, P007, P008, and P009 combined (in tpy); and
    - (2) an identification of the facility-wide SO<sub>2</sub> emissions from B001, B002, B003, B006, P001, P002, P003, P006, P007, P008, and P009 combined (in tpy).



**Final Permit-to-Install and Operate**  
TOLEDO HOSPITAL  
**Permit Number:** P0115031  
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**Effective Date:** 7/5/2013

## **C. Emissions Unit Terms and Conditions**



1. **B006, #4 BOILER**

**Operations, Property and/or Equipment Description:**

25.1 mmBtu Boiler – natural gas/No. 2 fuel oil fired

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

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

a. None.

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

a. None.

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

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Emissions from the stack serving this emissions unit shall not exceed: 0.083 lb/mmBtu of carbon monoxide (CO), 0.15 lb/mmBtu and 16.43 tpy of nitrogen oxides (NOx), 2.19 tpy of particulate emissions (PE), 0.6 lbmmscf and 0.07 tpy of sulfur dioxide (SO2) from the combustion of natural gas, 55.75 tpy of SO2 from the combustion of fuel oil, 0.0054 lb/mmBtu of volatile organic compounds (VOC), and



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		see b)(2)a. through b)(2)c.
b.	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 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-10(B)(1)	Emissions from the stack serving this emissions unit shall not exceed 0.020 pound of PE per million Btu of actual heat input.
d.	OAC rule 3745-18-06(A)	Exempted by the provisions of OAC rule 3745-18-06.  See b)(2)d.
e.	OAC rule 3745-18-06(D)	The emission limitation for oil specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-110-03(A) through (F)	Exempted by the provisions of OAC rule 3745-110-03(J)(16).
g.	40 CFR Part 60, Subpart A	see b)(2)e.
h.	40 CFR Part 60, Subpart Dc (40 CFR 60.40c through 60.48c)  In accordance with 40 CFR 60.40c, this emissions unit is a steam generating unit for which construction commenced after June 9, 1989 and that has a maximum design heat input capacity of 100 mmBtu per hour or less, but greater than or equal to 10 mmBtu per hour and is subject to the emission limitations/control measures specified in this section.	See b)(2)f. through b)(2)h.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-10(B)(1), 3745-18-06(A), and 40 CFR Part 60, Subpart Dc.
- b. The lb/mmBtu and tpy, emission limitations are based on the potential to emit at the maximum operating rate. Therefore, no monitoring, record keeping, and



reporting requirements are necessary to ensure ongoing compliance with these emission limitations.

- c. In accordance with the permit application, the permittee has indicated that the burner on this emissions unit is capable of burning on natural gas, no. 2 fuel oil with a sulfur content no greater than 0.5 weight percent sulfur, or ultra-low sulfur diesel with a maximum sulfur content of 0.0015 weight percent for the purpose of ensuring compliance with the sulfur emissions limitations. Therefore, it is not necessary to develop additional recordkeeping and/or reporting requirements to ensure compliance with these limitations beyond the maximum sulfur content of the fuel burned.
- d. OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for the fuel burning equipment when this emissions unit employs only natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the 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 3745-18-06, the requirements still exists as part of the federally-approved SIP for Ohio.

- e. 40 CFR Part 60 subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.
- f. On any day which natural gas is the only fuel combusted in this emissions unit, this rule does not establish emission limitations, but does require recordkeeping of gas usage per 40 CFR 60.48c(g).
- g. In accordance with the provisions of 60.42c(d) and 60.42c(h):
  - i. emissions from the stack serving this emissions unit shall not exceed 215 ng/J (0.50 pound per mmBtu) heat input SO<sub>2</sub> from oil as rolling, 30-day average; or,
  - ii. the fuel oil combusted in this emissions unit shall contain no greater than 0.5 weight percent sulfur.



Compliance with the emission limits or fuel oil sulfur limits under this section may be determined based on a certification from the fuel supplier, as described under 60.48c(f).

- h. This emissions unit is subject to the applicable provisions of Subpart Dc of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas, no. 2 fuel oil, and/or ultra-low sulfur diesel as fuel in this emissions unit. No prior notice is required for the permittee to change the operating fuel between natural gas and fuel oil.
- (2) The permittee shall comply with the applicable operational requirements required under 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, including the following sections:

60.42c(d)	Requirement for SO <sub>2</sub> concentrations when burning oil.
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d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, no. 2 fuel oil, or ultra-low sulfur diesel, the permittee shall maintain a record of the type and quantity of fuel burned in each emissions unit.
- (2) The permittee shall comply with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, including the following sections:

60.46c(a)	Requirement to install, calibrate, maintain, and operate a CEMS for measuring SO <sub>2</sub> concentrations: or
60.46c(d)	As an alternative to operating a CEMS; determine the average SO <sub>2</sub> emission rate by sampling the fuel prior to combustion.
60.46c(e)	Exemption from 60.46(a) and (d) where the permittee demonstrates compliance based on fuel supplier certification, as described under § 60.48c(f).
60.48c(e)(11) & 60.48c(f)(1)	Requirements for records of fuel supplier certifications including certified statements.
60.48c(g)(2)	Requirement to record and maintain records of the amount of each fuel combusted during each calendar month.
60.48c(g)(3)	Option to record and maintain records of the total amount of all fuels delivered to that property during each calendar month.



e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall identify the following information in the Annual Permit Evaluation Reports (PER) in accordance with the monitoring requirements above:
  - a. each day when a fuel other than natural gas, no. 2 fuel oil, or ultra-low sulfur diesel was burned in this emissions unit.
- (3) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units: Industrial, Commercial, and Institutional Boilers and Process Heaters, including the following sections:

60.48c(d)	Requirement to submit reports.
60.48c(e)	Requirements for report contents.
60.48c(f)	Requirements for fuel supplier certifications.
60.48c(j)	Requirements for semi-annual reporting

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. Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average.  
  
 Applicable Compliance Method(s):  
  
 If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
  - b. Emission Limitation:  
  
 0.083 pound of CO per mmBtu  
  
 Applicable Compliance Method:  
  
 Compliance shall be demonstrated based upon an emission factor of 84 pounds of CO per million standard cubic feet and a heating value of 1020 Btu per



standard cubic foot from AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1, dated 7/98.

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

c. Emission Limitation:

NO<sub>x</sub> emissions shall not exceed 0.15 lb/mmBtu of heat input and 16.43 tons per year.

Applicable Compliance Method:

Compliance shall be determined through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-1 dated 7/98, as follows: divide the emission factor of 100 pounds of NO<sub>x</sub> emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60 Appendix A.

The annual emission limitation shall be determined through a one-time calculation based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, by multiplying the emission factor identified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 1.4, Table 1.4-1, revised 7/98 (100lb/mm scf) by the maximum rated input capacity (25.1 mmBtu/hr) and multiplying by the maximum hours natural gas can be burned (8,760 hr/yr) and dividing the result by 1,020 Btu/scf and 2,000 lb/ton.

d. Emission Limitation:

0.020 pound PE per mmBtu of heat input and 2.19 tons per year.

Applicable Compliance Method:

Compliance shall be determined through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.3-1 dated 9/98, as follows: divide the emission factor of 2 pounds of particulate emissions per 1000 gallons by a heating value of 0.14 million Btu per gallon.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(9).



The annual emission limitation shall be determined through a worst-case calculation based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors,

For no. 2 fuel oil: by multiplying the emission factor identified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 1.3, Table 1.3-1, revised 5/10 (2 lb/1,000 gal) by the maximum rated input capacity (25.1 mmBtu/hr) and multiplying by the maximum hours no. 2 fuel oil can be burned (8,760 hr/yr) and dividing the result by 0.14 mmBtu/gal and 2,000 lb/ton.

e. Emission Limitation:

0.6 pound SO<sub>2</sub> per million cubic feet of heat input when combusting natural gas and 0.07 tpy.

Applicable Compliance Method:

The emission limitation was based upon the emission factor from AP-42, "Compilation of Air Pollution Emission Factors", 5<sup>th</sup> Edition, Section 1.4, Table 1.4-2 (7/98) (0.6 pound of SO<sub>2</sub> per million cubic feet of natural gas).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4 and Method 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternative equivalent methods may be used based upon approval by the Toledo Division of Environmental Services.

The annual emission limitation was developed through a one-time calculation based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors,

For natural gas: by multiplying the emission factor identified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 1.4, Table 1.4-2, revised 7/98 (0.6lb/mmscf) by the maximum rated input capacity (25.1 mmBtu/hr) and multiplying by the maximum hours natural gas can be burned (8,760 hr/yr) and dividing the result by 1,020 Btu/scf and 2,000 lb/ton.

f. Emission Limitation:

combust no oil that contains greater than 0.5 weight percent sulfur

combust no oil that contains greater than 0.50 pound SO<sub>2</sub> per mmBtu of heat input

Applicable Compliance Method:

Compliance may be demonstrated by the methods and procedures of 40 CFR 60.44c(g) and (h). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.



If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04.

g. Emission Limitation(s):

55.75 tons SO<sub>2</sub> per year

Applicable Compliance Method(s):

The annual emission limitation was developed through a one-time calculation based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors: multiply the emission factor identified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Chapter 1.3, Table 1.3-1, revised 5/10 (142\*S<sub>1b</sub>/1,000 gal, where S<sub>1b</sub>=0.5%) by the maximum rated input capacity (25.1 mmBtu/hr) and multiplying by the maximum hours no. 2 fuel oil can be burned (8,760 hr/yr) and dividing the result by 0.14 mmBtu/gal and 2,000 lb/ton.

h. Emission Limitation:

0.0054 pound of VOC per mmBtu

Applicable Compliance Method:

Compliance shall be determined through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.4-2 dated 7/98, as follows: divide the emission factor of 5.5 pounds of VOC emissions per million standard cubic feet by a heating value of 1020 Btu per standard cubic foot.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 25 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-21-10..

g) Miscellaneous Requirements

(1) None.



**2. Emissions Unit Group - 43.5 mmBtu/hr Natural Gas/No. 2 boilers and 20.9 mmBtu/hr Natural Gas/No. 2 boiler: B001, B002, B003**

EU ID	Operations, Property and/or Equipment Description
B001	Keeler boiler, 43.5 mmBtu/hr; natural gas/No. 2 fuel oil
B002	Keeler boiler, 43.5 mmBtu/hr; natural gas/No. 2 fuel oil
B003	Cleaver-Brooks boiler, 20.9 mmBtu/hr; natural gas/No. 2 fuel oil

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

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

a. None.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average, except as provided by rule.
b.	OAC rule 3745-17-10(B)(1)	Emissions from the stack serving this emissions unit shall not exceed 0.020 pound of PE per million Btu of actual heat input.
c.	OAC rule 3745-18-06(A)	Exempted by the provisions of OAC rule 3745-18-06.  See b)(2)a.
d.	OAC rule 3745-18-06(D)	Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 1.6 pounds of sulfur dioxide per mmBtu actual heat input.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See b)(2)b.
e.	OAC rule 3745-110-03(A) through (F)	Exempted by the provisions of OAC rule 3745-110-03(J)(16).

(2) Additional Terms and Conditions

- a. OAC rule 3745-18-06(A) does not establish sulfur dioxide emission limitations for the fuel burning equipment when this emissions unit employs only natural gas as fuel. However, OAC rule 3745-18-06(A) requires that the natural gas being combusted meet certain fuel quality restrictions (a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pound per million standard cubic feet). Because the natural gas burned in this emissions unit is the standard, pipeline quality natural gas supplied to industrial, commercial, and residential users throughout the State, it is assumed that it meets the fuel quality restrictions; and no monitoring, record keeping or reporting requirements are necessary to ensure ongoing compliance with OAC rule 3745-18-06(A).

On September 1, 2003, OAC rule 3745-18-06 was revised to delete the following phrase: "having a heat content greater than 950 Btu per standard cubic foot and a sulfur content less than 0.6 pounds per million standard cubic feet". Therefore, this phrase is no longer part of the State regulations. However, that rule revision has not yet been submitted to the 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 3745-18-06, the requirements still exists as part of the federally-approved SIP for Ohio.

- b. In accordance with the permit application, the permittee has indicated that the burner on this emissions unit is capable of burning on natural gas, no. 2 fuel oil with a sulfur content no greater than 0.5 weight percent sulfur, or ultra-low sulfur diesel with a maximum sulfur content of 0.0015 weight percent for the purpose of ensuring compliance with the sulfur emissions limitations. Therefore, it is not necessary to develop additional recordkeeping and/or reporting requirements to ensure compliance with these limitations beyond the maximum sulfur content of the fuel burned.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas, no. 2 fuel oil, and/or ultra-low sulfur diesel as fuel in this emissions unit. No prior notice is required for the permittee to change the operating fuel between natural gas and fuel oil.



d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, no. 2 fuel oil, or ultra-low sulfur diesel, the permittee shall maintain a record of the type and quantity of fuel burned in each emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit. It is recommended that the PER is submitted electronically through the Ohio EPA's "e-Business Center: Air Services" although PERs can be submitted via U.S. postal service or can be hand delivered.
- (2) The permittee shall identify the following information in the Annual Permit Evaluation Reports (PER) in accordance with the monitoring requirements above:
  - a. each day when a fuel other than natural gas, no. 2 fuel oil, or ultra-low sulfur diesel was burned in this emissions unit.

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. Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average.

Applicable Compliance Method(s):

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:

0.020 pound PE per mmBtu of heat input.

Applicable Compliance Method:

Compliance shall be determined through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Table 1.3-1 dated 9/98, as follows: divide the emission factor of 2 pounds of particulate emissions per 1000 gallons by a heating value of 140 million Btu per 1000 gallons.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1



through 5 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(9).

c. Emission Limitation:

1.6 pounds SO<sub>2</sub> per mmBtu of heat input.

Applicable Compliance Method:

When firing no. 2 fuel oil, compliance may be demonstrated based upon the calculation specified in OAC rule 3745-18-04(F)(2).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04.

g) Miscellaneous Requirements

(1) None.