



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

9/11/2013

Certified Mail

Mr. Kevin McMunn  
OHIO PAPERBOARD CORPORATION  
310 West Water St.  
Baltimore, OH 43105-1272

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0123000005  
Permit Number: P0114312  
Permit Type: Renewal  
County: Fairfield

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

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/survey.aspx](http://www.epa.ohio.gov/survey.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 Ohio EPA DAPC, Central District Office at (614)728-3778 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: Ohio EPA-CDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
OHIO PAPERBOARD CORPORATION**

Facility ID:	0123000005
Permit Number:	P0114312
Permit Type:	Renewal
Issued:	9/11/2013
Effective:	9/11/2013
Expiration:	9/11/2018





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
OHIO PAPERBOARD CORPORATION

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## Authorization

Facility ID: 0123000005  
Application Number(s): A0012651, M0002046  
Permit Number: P0114312  
Permit Description: FEPTIO renewal permit for a 184 MMBtu/hr natural gas boiler with No. 2 fuel oil backup.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 9/11/2013  
Effective Date: 9/11/2013  
Expiration Date: 9/11/2018  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

OHIO PAPERBOARD CORPORATION  
310 WATER ST  
BALTIMORE, OH 43105

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:

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



**Final Permit-to-Install and Operate**  
OHIO PAPERBOARD CORPORATION  
**Permit Number:** P0114312  
**Facility ID:** 0123000005  
**Effective Date:** 9/11/2013

## Authorization (continued)

Permit Number: P0114312

Permit Description: FEPTIO renewal permit for a 184 MMBtu/hr natural gas boiler with No. 2 fuel oil backup.

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

<b>Emissions Unit ID:</b>	<b>B003</b>
Company Equipment ID:	Boiler #1
Superseded Permit Number:	01-4384
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
OHIO PAPERBOARD CORPORATION  
**Permit Number:** P0114312  
**Facility ID:** 0123000005  
**Effective Date:** 9/11/2013

## **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 Ohio EPA DAPC, Central District Office 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**  
OHIO PAPERBOARD CORPORATION  
**Permit Number:** P0114312  
**Facility ID:** 0123000005  
**Effective Date:** 9/11/2013

## **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.



**Final Permit-to-Install and Operate**  
OHIO PAPERBOARD CORPORATION  
**Permit Number:** P0114312  
**Facility ID:** 0123000005  
**Effective Date:** 9/11/2013

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



**1. B003, Boiler #1**

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

Natural gas fired 184 mmBtu/Hrboiler with NO. 2 oil backup

- 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. b)(1)d, c)(3), c)(4), d)(3) and e)(4)
- 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 shall not exceed 20% as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 pound per MMBtu of actual heat input.
c.	OAC rule 3745-18-06(D)	The limits of this rule are less strict than the limitations established pursuant to OAC rule 3745-31-05.
d.	OAC rule 3745-31-05(D) (synthetic minor to avoid Title V)	NOx emissions shall not exceed 73.54 tons per year as a rolling 12-month summation.  CO emissions shall not exceed 60.49 tons per year as a rolling 12-month summation.  SO2 emissions shall not exceed 17.95 tons per year as a rolling 12-month summation.
e.	OAC rule 3745-31-05(A)(3) (PTI 01-4384, issued 10/6/1993)	The sulfur content of the oil burned in this emissions unit shall not exceed 0.5% by weight.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>NOx emissions shall not exceed 0.20 pound per MMBtu when firing natural gas and 0.18 pound per MMBtu when firing no. 2 fuel oil.</p> <p>CO emissions shall not exceed 0.16 pound per MMBtu when firing natural gas and 0.18 pound per MMBtu when firing no. 2 fuel oil.</p> <p>OC emissions shall not exceed 0.02 pound per MMBtu when firing either natural gas or no. 2 fuel oil.</p> <p>SO2 emissions shall not exceed 0.5 pound per MMBtu of heat input when firing no. 2 fuel oil.</p>
f.	40 CFR 60 Subpart JJJJJJ	See b)(2)a. below.

(2) Additional Terms and Conditions

a. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers at Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.

c) Operational Restrictions

- (1) The quality of oil burned in this emissions unit shall meet, on an as-received basis, a sulfur content that will allow compliance with the maximum sulfur dioxide emission limitation of 0.5 lb SO<sub>2</sub>/MMBtu actual heat input. Compliance shall be demonstrated using analytical results provided by the permittee or oil supplier for each shipment of oil.
- (2) The actual operating rate for this emissions unit shall not exceed 108.2 MMBtu/hr.
- (3) The maximum annual natural gas consumption rate for B003 shall not exceed 680 million cubic feet, based upon a rolling, 12-month summation.
- (4) The maximum annual no. 2 fuel oil consumption rate for B003 shall not exceed 500,000 gallons, based upon a rolling, 12-month summation.



- (5) At no time shall the steam flow rate from B003 exceed 100,000 pounds per hour (as an average over anyone-hour period).
  - (6) For the purpose of demonstrating compliance during the first 12 calendar months of operation covered by this permit, the rolling 12-month naturalgas/fuel oil usages (gallons/rolling 12-month period) and SO<sub>2</sub>/NO<sub>x</sub>/COemissions shall be based upon the actual fuel(oil/natural gas) usages during the 12-month period prior to issuance of this permit.
  - (7) The permittee shall burn only natural gas and/or number two fuel oil in this emissions unit.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emission unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon receiving written approval from Ohio EPA.
  - (2) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain the following records:
    - a. the total quantity of fuel oil received in each shipment (gallons);
    - b. the permittee's or fuel oil supplier's analysis for sulfur content (percent by weight);
    - c. the permittee's or fuel oil supplier's analysis for heat content (Btu/gallon); and
    - d. the calculated sulfur dioxide emission rate (pounds SO<sub>2</sub> per MMBtu actual heat input) of the fuel oil received in each shipment.
  - (3) The permittee shall maintain monthly records of the following:
    - a. the fuel oil usage (gallons);
    - b. the rolling 12-month summation of the fuel oil usage (gallons);
    - c. the natural gas usage (cubic feet); and
    - d. the rolling 12-month summation of the natural gas usage (cubic feet).
  - (4) The permittee shall continuously monitor and record the steam flow rate from B003. Copies of all steam flow rate charts shall be maintained for a period of 5 years, and shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon verbal or written request.



e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the rolling 12-month natural gas and number 2 fuel oil consumption usage limitations;
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

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

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

- (3) The permittee shall submit quarterly reports of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. Each report shall identify:
  - a. the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil;
  - b. the total quantity of oil received in each shipment (gallons); and
  - c. the weighted\* average sulfur dioxide emission rate (pounds/MMBtu) for the oil received during each calendar month.

\*In proportion to the quantity of oil received in each shipment during the calendar month.

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



- (4) The permittee shall submit annual reports that contain the following information:
- a. the total amount of natural gas burned (cubic feet);
  - b. the total amount of no.2 fuel oil burned (gallons); and
  - c. the total emissions of NO<sub>x</sub>, CO, and SO<sub>2</sub>.

Each report shall be submitted by February 15 of each year and shall cover the previous calendar year.

- (5) If for any reason the steam flow rate from B003 exceeds 100,000 pounds per hour, the following information shall be reported within 5 business days after the exceedance:
- a. the date of the exceedance;
  - b. the time interval over which the exceedance occurred;
  - c. the value of the exceedance;
  - d. the cause(s) of the exceedance;
  - e. the corrective action which has been or will be taken to prevent similar exceedances in the future; and
  - f. a copy of the steam chart which shows the exceedance.

The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

- (6) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services 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.

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(s) 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(s) Limitation:

Particulate emissions shall not exceed 0.020 pound per MMBtu of actual heat input.

Applicable Compliance Method:

For the use of natural gas, compliance shall be determined by multiplying the maximum gas burning capacity of the emissions unit (108,200 CF/hr) by the AP-42 (Fifth Edition) emission factor for natural gas combustion (1.9 lbs/MMCF) and dividing by the maximum heat input capacity of the emissions unit (108.2 MMBtu/hr). For the use of number two fuel oil, compliance shall be determined by multiplying the maximum allowable capacity of the emissions unit (799 gallons/hr) by the AP-42 (Fifth Edition) emission factor for number two fuel oil (0.252 lb/thousand gallons) and dividing by the maximum allowable burning capacity of the emissions unit (108.2 MMBtu/hr).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 5.

c. Emission(s) Limitation:

NOx emissions shall not exceed 73.54 tons per year as a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be determined through the following method: The total volume of natural gas used for the rolling 12-month period (MMCF/12-month period) shall be multiplied by 1,000 Btu/CF and the natural gas combustion emission factor of 0.20lb NOx/MMBtu (emission factor derived from 12/23/1993 stack test results). The total volume of fuel oil used for the 12-month period (10<sup>3</sup> gallons/12-month period) shall be multiplied by the AP-42 (Fifth Edition) emission factor for fuel oil combustion (24.0 lbs/10<sup>3</sup> gallon). The calculated emissions from natural gas combustion and fuel oil combustion shall be added and then divided by 2000 lbs/ton to obtain the total NOx emissions (tons NOx/12-month period).

d. Emission(s) Limitation:

CO emissions shall not exceed 60.49 tons per year as a rolling 12-month summation.



Applicable Compliance Method:

Compliance shall be determined through the following method:  
The total volume of natural gas used for the rolling 12-month period (MMCF/12-month period) shall be multiplied by 1,000 Btu/CF and the natural gas combustion emission limitation of 0.16 lb CO/MMBtu. The total volume of fuel oil used for the 12-month period (gallons/12-month period) shall be multiplied by 135,382 Btu/gallon. The product shall be divided by 1,000,000 to convert to MMBtu and then multiplied by the fuel oil combustion emission limitation of 0.18 lb/MMBtu. The calculated emissions from natural gas combustion and fuel oil combustion shall be added and then divided by 2000 lbs/ton to obtain the total CO emissions (tons CO/12-month period).

e. Emission(s) Limitation:

SO<sub>2</sub> emissions shall not exceed 17.95 tons per year as a rolling 12-month summation.

Applicable Compliance Method:

Compliance shall be determined through the following method:  
The total volume of natural gas used for the rolling 12-month period (MMCF/12-month period) shall be multiplied by 1,000 Btu/CF and the natural gas combustion emission limitation of 0.001 lb SO<sub>2</sub>/MMBtu. The total volume of fuel oil used for the 12-month period (gallons/12-month period) shall be multiplied by 0.071 lb SO<sub>2</sub>/gallon. The calculated emissions from natural gas combustion and fuel oil combustion shall be added and then divided by 2000 lbs/ton to obtain the total SO<sub>2</sub> emissions (tons SO<sub>2</sub>/12-month period).

f. Emission(s) Limitation:

The sulfur content of the oil burned in this emissions unit shall not exceed 0.5% by weight.

Applicable Compliance Method:

Compliance shall be demonstrated from the sampling requirement in d(1).

g. Emission(s) Limitation:

NO<sub>x</sub> emissions shall not exceed 0.20 pound per MMBtu when firing natural gas and 0.18 pound per MMBtu when firing no. 2 fuel oil.

Applicable Compliance Method:

Compliance with the short term natural gas limit was demonstrated with a stack test, performed 12/22/1993. The results of the emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7, produced an average NO<sub>x</sub> emission rate of 0.1475 lb/MMBtu.



Compliance with the short term fuel oil limit was demonstrated with a stack test, performed 12/23/1993. The results of the emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7, produced an average NO<sub>x</sub> emission rate of 0.1177 lb/MMBtu.

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

h. Emission(s) Limitation:

CO emissions shall not exceed 0.16 pound per MMBtu when firing natural gas and 0.18 pound per MMBtu when firing no. 2 fuel oil.

Applicable Compliance Method:

Compliance with the short term natural gas limit was demonstrated with a stack test, performed 12/22/1993. The results of the emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10, produced an average CO emission rate of 0.0116 lb/MMBtu.

Compliance with the short term fuel oil limit was demonstrated with a stack test, performed 12/23/1993. The results of the emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10, produced an average CO emission rate of 0.005 lb/MMBtu.

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

i. Emission(s) Limitation:

OC emissions shall not exceed 0.02 pound per MMBtu when firing either natural gas or no. 2 fuel oil.

Applicable Compliance Method:

For the use of natural gas, compliance shall be determined by multiplying the allowable gas burning capacity of the emissions unit (108,200 CF/hr) by the AP-42 (Fifth Edition) emission factor for natural gas combustion (5.8 lbs/MMCF) and dividing by the maximum heat input capacity of the emissions unit (108.2 MMBtu/hr). For the use of number two fuel oil, compliance shall be determined by multiplying the maximum allowable capacity of the emissions unit (799 gallons/hr) by the AP-42 (Fifth Edition) emission factor for number two fuel oil (0.2 lb/thousand gallons) and dividing by the allowable burning capacity of the emissions unit (108.2 MMBtu/hr).

j. Emission(s) Limitation:

SO<sub>2</sub> emissions shall not exceed 0.5 pound per MMBtu of heat input when firing no. 2 fuel oil.



Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping and reporting requirements in Section d)(2) and e)(3), respectively, using the applicable equation in OAC rule 3745-18-04(F).

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

- g) Miscellaneous Requirements
  - (1) None.