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

10/10/2013

Certified Mail

Robert Counselman
Campbell Soup Company
Campbell Soup Supply Company LLC
12-773 State Route 110
Napoleon, OH 43545

Facility ID: 0335010105
Permit Number: P0115162
County: Henry

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Northwest-Signal. A copy of the public notice, the Statement of Basis, 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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

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 if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

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-NWDO; Michigan; Indiana

PUBLIC NOTICE
10/10/2013 Issuance of Draft Air Pollution Title V Permit

Campbell Soup Company
Campbell Soup Company LLC, 12-773 State Route 110
Napoleon, OH 43545
Henry County
FACILITY DESC.: Specialty Canning
PERMIT #: P0115162
PERMIT TYPE: Renewal
PERMIT DESC: Renewal Title V operating permit for a canned food processing facility.

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: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0335010105
Facility Name:	Campbell Soup Company
Facility Description:	Campbell Soup Company
Facility Address:	Campbell Soup Company LLC, 12-773 State Route 110, Napoleon, Ohio 43545
Permit #:	P0115162, Renewal

This facility is subject to Title V because it is major for:

☐ Lead ☒ Sulfur Dioxide ☒ Carbon Monoxide ☐ Volatile Organic Compounds ☒ Nitrogen Oxides
☒ Particulate Matter ≤ 10 microns ☐ Single Hazardous Air Pollutant ☐ Combined Hazardous Air Pollutants
☐ Maximum Available Control Technology Standard(s) ☐ GHG ☐ Title IV

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	No
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A

Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	Removed applicability of 40 CFR Part 63 Subpart DDDDD because the facility is now a minor HAP source. The facility removed their coal fired boilers from operation. B012, B013 and B014 – (1) added a paragraph noting that 40 CFR Part 63 Subpart JJJJJJ is not applicable because these emissions units are natural gas fired and only fire #2 fuel oil during natural gas curtailment, gas supply interruption, startups or periodic testing. (2) removed paragraph f)(2) from these units because it related to the certification test of the continuous NOx monitoring system that was required in 2011. The requirement for this term has passed.
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	CAM does not apply to any of the emissions units in this permit because they are uncontrolled sources.

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2.	77-07		List insignificant emissions units subject to one or more applicable requirements

C. Emissions Unit Terms and Conditions

Key:
EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
Misc = miscellaneous requirements

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
F001	Exempt	17-07(B)		Y	N	N	N	Y	Y	N	N	N	ND-This emissions unit is exempt from the visible particulate emissions limitation specified in OAC rule 3745 17 07(B), pursuant to OAC rule 3745 17 07(B)(11)(e). M, R, Rp& ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
F001	Exempt	17-08(B)		Y	N	N	N	N	N	N	N	N	ND-This facility is not located within an "Appendix A" area as identified in OAC rule 3745 17 08 (it is located in Marion County). Therefore, pursuant to OAC rule 3745 17 08(A), this emissions unit is exempt from the requirements of OAC rule 3745 17 08(B). M, R, Rp& ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required.
P016	Exempt	17-11(B)		Y	N	N	N	N	N	N	N	N	ND-The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. Process weight is defined in OAC rule 3745-17-01(B)(17) M, R, Rp& ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required
P016	Exempt	17-07(B)(1)		Y	N	N	N	N	N	N	N	N	ND-This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11. M, R, Rp& ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping, reporting or emissions testing is required
P016	Exempt	18-06(E)		Y	N	N	N	N	N	N	N	N	ND- OAC rule 3745-18-06(E) does not apply because the process weight rate is equal to zero. Process weight is defined in OAC rule 3745-18-01(B)(14). M, R, Rp& ET-There are no emissions limitations established pursuant to this rule, therefore, no monitoring, recordkeeping,

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													reporting or emissions testing is required
R001 R002	1.52 lbs OC/hr		OAC rule 3745-31-05(D)	N	N	Y	N	Y	Y	N	N	N	ET-Calculations based on the maximum hourly adhesive coating usage and the maximum OC content are sufficient to show compliance.
R001 R002	6.66 tons OC/yr		OAC rule 3745-31-05(D)	N	N	Y	N	Y	Y	N	N	N	ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
B012 B013 B014	Opacity Restrictions *		OAC rule 3745-31-05(D)	N	N	Y	N	Y	Y	N	N	N	*Visible particulate emissions while burning natural gas shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule. The visible particulate emission limitation established by 40 CFR Subpart Db is more stringent than OAC rule 3745-17-07(A) during #2 fuel oil use. *Visible particulate emissions while burning #2 fuel oil shall not exceed 20 percent opacity, as a six-minute average, except for one 6-minute period per hour of not more than twenty-seven percent (27%) opacity. ET –M,R, Rp sufficient to show compliance. Method 9 readings, if required.
B012	Emissions from Natural Gas Usage: 0.04 pound nitrogen oxides (NOx)/mmBtu; 31.54 tons NOx/year Emissions from #2 Fuel Oil Usage: 0.12 pound NOx/mmBtu; 18.36 tons NOx/rolling, 12-month period		OAC rule 3745-31-05(D)	N	N	Y	N	Y	Y	Y	N	N	

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
B012	Emissions from Natural Gas Usage: 0.015 pounds particulate matter 10 microns or less in size (PM10)/mmBtu; 11.83 tons PM10/year Emissions from #2 Fuel Oil Usage: 0.02 pound PM10/hour; 3.06 tons PM10/rolling, 12-month period		OAC rule 3745-31-05(D)	N	N	Y	N	Y	Y	N	N	N	ET – Compliance shall be determined by manufacture data.
B012	Emissions from Natural Gas Usage: 0.0006 pound sulfur dioxide (SO2)/mmBtu; 0.48 ton SO2/year Emissions from #2 Fuel Oil Usage: 0.0015 pound SO2/mmBtu; 0.23 ton SO2/rolling 12-month period		OAC rule 3745-31-05(D)	N	N	Y	N	Y	Y	N	N	N	ET - Compliance shall be determined by AP-42 emission factors.
B012	Emissions from Natural Gas Usage:		OAC rule 3745-31-05(A)(3), as effective 11/30/01	N	N	Y	N	Y	Y	N	N	N	ET - Compliance shall be determined by AP-42 emission factors.

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	0.0054 pound volatile organic compounds (VOC)/mmBtu; 4.25 tons VOC/year Emissions from #2 Fuel Oil Usage: 0.0014 pound VOC/mmBtu; 0.21 ton VOC/year												
B012	none		OAC rule 3745-31-05(A)(3), as effective 12/01/06;	Y	N	N	N	N	N	N	N	N	ND - Until this rule revision is approved by the U.S. EPA, BAT requirements have been determined to be: compliance with the fuel type and usage restrictions; compliance with the sulfur content restriction in c)(2); compliance with the emission limitations contained in b)(1)b; and compliance with the SO2 emission limitations established under OAC rule 3745-31-05(D).
B012	Emissions from Natural Gas Usage: 0.075 pound carbon monoxide (CO)/mmBtu; 59.13 tons CO/rolling, 12-month period Emissions from #2 Fuel Oil Usage: 0.037 pound CO/mmBtu; 5.66 tons CO/rolling, 12-month period		OAC rules 3745-31-10 through 3745-31-20	N	N	Y	N	Y	Y	Y	N	N	
B012,			ORC 3704.03(T)	Y	N	N	N	N	N	N	N	N	ND – Compliance with this rule includes compliance with 31-05(D)

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
B013, B014													and 31-10 through 31-20.
B012, B013, B014	20% opacity	OAC rule 3745-17-07(A)											OAC rule 3745-31-05(D) as stringent or more stringent (see opacity restrictions above)
B012, B013, B014		OAC rule 3745-17-10(B)(1)		Y	N	N	N	N	N	N	N	N	ND – The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
B012, B013, B014		OAC rule 3745-18-06(D)		Y	N	N	N	N	N	N	N	N	ND - The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
B012, B013, B014		OAC rule 3745-110-03(C)		Y	N	N	N	N	N	N	N	N	ND – The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
B012, B013, B014			OAC rule 3745-114 -01 ORC 3704.03(F)	N	N	Y	N	Y	Y	N	N	N	ET- Compliance is determined through Air Toxics (SCREEN 3) modeling.
B012, B013, B014			40 CFR Part 60, Subpart Db (40 CFR 60.40b – 60.49b)	N	N	Y	N	Y	Y	N	N	N	ET- No emission limitations were established to this rule.
B013, B014	Emissions from Natural Gas Usage: 0.04 pound nitrogen oxides (NOx)/mmBtu; 31.54 tons NOx/year Emissions from #2 Fuel Oil Usage: 0.10 pound	N	OAC rule 3745-31-05(D)	N	N	Y	N	Y	Y	Y	N	N	

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	NOx/mmBtu; 7.88 tons NOx/rolling, 12-month period												
B013, B014	Emissions from Natural Gas Usage: 0.01 pounds particulate matter 10 microns or less in size (PM10)/mmBtu; 7.88 tons PM10/year Emissions from #2 Fuel Oil Usage: 0.02 pound PM10/mmBtu; 1.58 tons PM10/rolling, 12-month period		OAC rule 3745-31-05(D)	N	N	Y	N	Y	Y	N	N	N	ET – Compliance shall be determined by manufacture data.
B013, B014	Emissions from Natural Gas Usage: 0.0006 pound sulfur dioxide (SO2)/mmBtu; 0.48 ton SO2/year Emissions from #2 Fuel Oil Usage: 0.0015 pound SO2/mmBtu; 0.12 ton SO2/rolling 12-month period		OAC rule 3745-31-05(D)	N	N	Y	N	Y	Y	N	N	N	ET - Compliance shall be determined by AP-42 emission factors.

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
B013, B014	Emissions from Natural Gas Usage: 0.0054 pound volatile organic compounds (VOC)/mmBtu; 4.25 tons VOC/year Emissions from #2 Fuel Oil Usage: 0.0014 pound VOC/mmBtu; 0.11 ton VOC/year	N	OAC rule 3745-31-05(A)(3), as effective 11/30/01	N	N	Y	N	Y	Y	N	N	N	ET - Compliance shall be determined by AP-42 emission factors.
B013, B014	none		OAC rule 3745-31-05(A)(3), as effective 12/01/06										ND- BAT does not apply for VOC AND SO2 when USEPA approves 12/1/06 rule revision.
B013, B014	Emissions from Natural Gas Usage: 0.075 pound carbon monoxide (CO)/hour; 59.13 tons CO/rolling, 12-month period Emissions from #2 Fuel Oil Usage: 0.037 pound CO/mmBtu; 2.92 tons CO/rolling, 12-month period		OAC rules 3745-31-10 through 3745-31-20	N	N	Y	N	Y	Y	Y	N	N	

DRAFT

Division of Air Pollution Control
Title V Permit
for
Campbell Soup Company

Facility ID:	0335010105
Permit Number:	P0115162
Permit Type:	Renewal
Issued:	10/10/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Campbell Soup Company

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Authorization

Facility ID:	0335010105
Facility Description:	
Application Number(s):	A0046577
Permit Number:	P0115162
Permit Description:	Renewal Title V operating permit for a canned food processing facility.
Permit Type:	Renewal
Issue Date:	10/10/2013
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0108585

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Campbell Soup Company
Campbell Soup Company LLC
12-773 State Route 110
Napoleon, OH 43545

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

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the

insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. 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, reopening 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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.

b) 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 paragraph (E) of OAC rule 3745-77-03.

(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.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

25. Records Retention RequirementsUnder State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. 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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

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. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject toone or more applicable requirement contained in a permit-to-install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18 and 3745-21.

   a) P007 - 130 hp distillate oil Caterpillar firefighting water pump;
   b) P008 - 350 hp natural gas Climax electrical generator;
   c) P009 - 285 hp distillate oil Detroit firefighting water pump;
   d) P010 - 315 Kw distillate oil Kohler electrical generator;
   e) P011 - 300 hp distillate oil John Deere firefighting water pump;
   f) P012 – Diesel Electrical Generator for Bldgs N-13 and N-14
   g) P013 - video ink jet printers;
   h) P014 - Emergency Diesel Generator; and
   i) P015 - Low Service Emergency Generator.

C. Emissions Unit Terms and Conditions

1. B012, B012

Operations, Property and/or Equipment Description:

180 mmBtu/hr, Natural Gas fired steam boiler equipped with #2 fuel oil backup and continuous emissions monitor (CEM)

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) b)(1)c., b)(1)j., d)(8), d)(9), d)(10), d)(11) 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 3745-31-05(D) [PTI P0106678 issued 12/14/10]	Opacity Restrictions [See b)(2)g. and b)(2)h.] See b)(2)a. and b)(2)b. <u>Emissions from Natural Gas Usage:</u> 0.04 pound nitrogen oxides (NO_x)/mmBtu; 31.54 tons NO_x/year 0.015 pounds particulate matter 10 microns or less in size (PM_{10})/mmBtu; 11.83 tons PM_{10}/year <u>Emissions from #2 Fuel Oil Usage:</u> 0.12 pound NOx/mmBtu; 18.36 tons NO_x/rolling, 12-month period 0.02 pound PM_{10}/hour; 3.06 tons PM_{10}/rolling, 12-month period 0.0015 pound SO_2/mmBtu; 0.23 ton SO_2/rolling 12-month period
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 [PTI P0106678 issued 12/14/10]	See b)(2)c. <u>Emissions from Natural Gas Usage:</u> 0.0054 pound volatile organic compounds (VOC)/mmBtu; 4.25 tons VOC/year

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.0006 pound sulfur dioxide (SO_2)/mmBtu; 0.48 ton SO_2/year <u>Emissions from #2 Fuel Oil Usage:</u> 0.0014 pound VOC/mmBtu; 0.21 ton VOC/year
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.
d.	OAC rules 3745-31-10 through 3745-31-20	See b)(2)e. <u>Emissions from Natural Gas Usage:</u> 0.075 pound carbon monoxide (CO)/mmBtu; 59.13 tons CO/rolling, 12-month period <u>Emissions from #2 Fuel Oil Usage:</u> 0.037 pound CO/mmBtu; 5.66 tons CO/rolling, 12-month period
e.	ORC 3704.03(T)	See b)(2)f.
f.	OAC rule 3745-17-07(A)	See b)(2)g. and b)(2)h.
g.	OAC rule 3745-17-10(B)(1)	See b)(2)i.
h.	OAC rule 3745-18-06(D)	See b)(2)i.
i.	OAC rule 3745-110-03(C)	See b)(2)i.
j.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(8) through d)(11)
k.	40 CFR Part 60, Subpart Db (40 CFR 60.40b – 60.49b)	See b)(2)h. and b)(2)j.
l.	40 CFR Part 63, Subpart JJJJJJ	See b)(2)l.

(2) Additional Terms and Conditions

a. Permit to install (PTI) P0106678 establishes the following federally enforceable emission limitations for purposes of limiting potential to emit (PTE) to avoid Prevention of Significant Deterioration (PSD) applicability for NOx, and PM_{10}. The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) which limits fuel usage type and the following burner design performance specifications for each fuel:

i. emission limitation for natural gas fuel use:

(a) 0.04 pound NO_x per mmBtu; and

(b) 0.015 pound PM_{10} per mmBtu.

All emissions of particulate matter from the use of natural gas are PM_{10}.

The federally enforceable emission limitations established above for the use of natural gas result in an annual PTE of 31.54 tons NOx and 11.83 tons PM_{10}. Annual PTE levels were determined by multiplying thefederally enforceable pound/mmBtu emission limitations by a maximum heat input of 180 mmBtu/hour and a maximum operating schedule of 8,760 hours/year and dividing by 2,000 pounds/ton. The annual PTE levels have been established in tons per year limitations [see b)(1)a.].

ii. emission limitation for #2 fuel oil use:

(a) 0.12 pound NO_x per mmBtu;

(b) 0.0015 pound SO_2/mmBtu; and

(c) 0.02 pound PM_{10} per mmBtu.

All emissions of particulate matter from the use #2 fuel oil are PM_{10}.

The annual PTE for emissions from the use of #2 fuel oil are limited further by additional federally enforceable requirements on #2 fuel usage [see b)(2)b., c)(2), and c)(3)]

b. This permit establishes the following additional federally enforceable emission limitations for purposes of limiting the annual PTE for emissions associated with the use of #2 fuel oil. The federally enforceable emission limitations are based on the operational restrictions contained in c)(2) and c)(3) which restrict #2 fuel oil usage:

i. 18.36 tons NO_x per rolling, 12-month period;

ii. 5.66 tons CO per rolling, 12-month period;

iii. 3.06 tons PM_{10} per rolling, 12-month period;

iv. 0.23 ton SO_2/rolling 12-month period.

c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit for VOC. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D) for SO_2; therefore, the permitteehas satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit for SO_2.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by state regulations for NAAQS pollutants 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 3745-31-05, then these emission limits/control measures no longer apply.

Until this rule revision is approved by the U.S. EPA, BAT requirements have been determined to be:

i. compliance with the fuel type and usage restrictions;

ii. compliance with the sulfur content restriction in c)(2);

iii. compliance with the emission limitations contained in b)(1)b; and

iv. compliance with the SO_2 emission limitations established under OAC rule 3745-31-05(D).

d. 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)(a) do not apply to the VOC and SO_2emissions from this air contaminant source, taking into account the following restrictions established in this permit which results in emissions for each pollutant of less than 10 tons per year:

i. fuel type and usage restrictions; and

ii. sulfur content restriction.

[Note: The worst case operating scenario for VOC emissions has been determined to be when the boiler is operated on natural gas at a rate of 8,760 hours/year. The worst case operating scenario for SO_2 emissions has been determined to be when the boiler is operated at the maximum annual #2 fuel oil usage rate in c)(3) and with natural gas for the remainder of the year.]

iii. The potential to emit for VOC emissions from natural gas combustion is calculated based upon an emission factor of 5.5 pounds/10^6scf [AP-42 Chapter 1.4, 7/1998] multiplied by a conversion factor of 10^6scf/1020 mmBtu, a maximum heat input of 180 mmBtu/hour, and the maximum operating schedule of 8,760 hours/year, and then divide by 2,000 pounds/ton (4.25 TPY).

iv. The potential to emit of SO_2 from this emissions unit (0.61 TPY) is calculated by summing the SO_2 emissions from #2 fuel oil combustion at the maximum annual usage rate and the SO_2 emissions from the combustion of natural gas for the remainder of the year (7,060 hours/year), where:

(a) The SO_2 emissions from #2 fuel oil combustion are based upon an emission factor of (142*S) pounds/1000 gallons [AP-42 Chapter 1.3, (5/2010)], where S = the fuel sulfur content in percent by

weight (0.0015). The annual emissions are estimated by multiplying the emission factor (0.213 lb/1000 gallons) by the maximum annual fuel usage restriction of 2,142,833 gallons/year, and then dividing by 2,000 pounds/ton (0.23 TPY).

(b) The SO_2 emissions from natural gas combustion are calculated based upon an emission factor of 0.6 pound/10^6scf [AP-42 Chapter 1.4, 7/1998] multiplied by a conversion factor of 10^6scf/1020 mmBtu, the maximum heat input of 180 mmBtu/hour, and the maximum operating schedule of 7,060 hours/year, and then divided by 2,000 pounds/ton (0.38 TPY).

e. The permittee shall employ best available control technology (BACT) for this emissions unit. BACT has been determined to be the following emission limitations:

i. for natural gas usage: 0.075 pound CO per mmBtu; and 59.13 tons CO per rolling, 12-month period; and

ii. for #2 fuel oil usage: 0.037 pound CO per mmBtu; and 5.66 tons CO per rolling, 12-month period.

The BACT analysis determined that no add-on controls were cost effective for the reduction of CO.

f. The BAT requirements under ORC 3704.03(T) have been determined to be compliance with the pound per mmBtu requirements established pursuant to OAC rule 3745-31-05(D) for NOx and PM_{10} and OAC rules 3745-31-10 through 3745-31-20 for CO.

g. Visible particulate emissions while burning natural gas shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule. The visible particulate emission limitation established by 40 CFR Subpart Db is more stringent than OAC rule 3745-17-07(A) during #2 fuel oil use [see b)(2)h.]

h. Visible particulate emissions while burning #2 fuel oilshall not exceed 20 percentopacity, as a six-minute average, except for one 6-minute period per hour of not more than twenty-seven percent (27%) opacity.

i. The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).

j. Within 180 days of the effective date of this permit, the permittee shall develop and maintain a written quality assurance/quality control plan for the continuous NOx monitoring system, designed to ensure continuous valid and representative readings of NOx emissions in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous NOx monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

k. Prevention of Significant Deterioration (PSD) requirements for particulate matter equal to or less than 2.5 microns in size ($PM_{2.5}$) are being implemented through the PM_{10} Surrogate Policy issued by EPA in 1997. For purposes of demonstrating that PM_{10} is a reasonable surrogate for $PM_{2.5}$, all emissions of PM_{10} will be considered $PM_{2.5}$.

l. This emissions unit is exempt from the requirements of 40 CFR Part 63 Subpart JJJJJJ pursuant to 40 CFR 63.11195(e). #2 fuel oil is only to be used during natural gas curtailment, gas supply interruption, startups or periodic testing.

c) Operational Restrictions

(1) The permittee shall only burn natural gas or#2 fuel oil in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI P0106678]

(2) The #2 fuel oil combusted in this emissions unit shall only be #2 fuel oil, as defined by the American Society for Testing and Materials in ASTM D396-78, 89, 90, 92, 96, or 98, "Standard Specification for Fuel Oils". The sulfur content of the #2 fuel oil shall not exceed 0.0015 percent, by weight.

[OAC rule 3745-77-07(A)(1) and PTI P0106678]

(3) The following operational restrictions are being established for purposes of establishing federally enforceable requirements which limit PTE [see b)(2)b.].

a. The maximum #2 fuel oil usage for this emissions unit shall not exceed 2,142,833 gallons per year, based upon a rolling, 12-month summation of the monthly fuel usage.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the #2 fuel oil usage, upon issuance of this permit.

[OAC rule 3745-77-07(A)(1) and PTI P0106678]

d) Monitoring and/or Recordkeeping Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

(2) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the fuel oil type (number 2, 4, or 6),

the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in pounds/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294,Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

(3) In lieu of the requirements of d)(2) for the sulfur content of #2 fuel oil, the permittee may keep records of fuel oil supplier certification, which shall include the following information:

a. The name of the oil supplier.

b. A statement from the oil supplier that the oil complies with the specifications under the definition of 'distillate oil' in 40 CFR 60.41c.

c. The sulfur content of the oil.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

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

a. the amount of #2 fuel oil burned, in gallons/month; and

b. the rolling, 12-month summation of the #2 fuel usage rates, in gallons.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative fuel usage for each calendar month.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

(5) Each continuous NOx monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2. At least 45 days before commencing certification testing of the continuous NOx monitoring system(s), the permittee shall develop and maintain a written quality assurance/quality control plan designed to ensure continuous valid and representative readings of NOx emissions fromthe continuous monitor(s), in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous NO_x monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

[OAC rule 3745-77-07(C)(1), 40 CFR 60.13, 40 CFR Part 60, Appendix F, and PTI P0106678]

(6) Prior to the installation of the continuous NOx monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the requirements in 40 CFR Part 60, Appendix B, Performance Specifications 2 for approval by the Ohio EPA, Central Office. The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous NOx monitoring system meets the requirements of Performance Specification 2. Once received, the letter/document of certification shall be maintained on-site and shall be made available to the director (the appropriate Ohio EPA District Office or local air agency) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

[OAC rule 3745-77-07(C)(1), 40 CFR 60.13, 40 CFR Part 60, Appendix B and PTI P0106678]

(7) The permittee shall install, operate, and maintain equipment to continuously monitor and record NOx emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Parts 60.

The permittee shall maintain records of data obtained by the continuous NOx monitoring system including, but not limited to:

a. emissions of NO_x in parts per million on an instantaneous (one-minute) basis;

b. emissions of NO_x in all units of the applicable standard(s) in the appropriate averaging period;

c. results of quarterly cylinder gas audits;

d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);

f. hours of operation of the emissions unit, continuous NO_x monitoring system, and control equipment;

g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NO_x monitoring system;

h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NO_x monitoring system; as well as,

i. the reason (if known) and the corrective actions taken (if any) for each such event in d)(7)g. and d)(7)h.

[OAC rule 3745-77-07(C)(1), 40 CFR 60.13, 40 CFR Part 60, Appendices B & F, and PTI P0106678]

(8) The permit to install application for emissions units B012, B013, and B014 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "2" hours per day and "" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Hexane

TLV (mg/m3): 176.237

Maximum Hourly Emission Rate (lbs/hr): 0.97

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 4.1

MAGLC (µg/m3): 4,196

The permittee, has demonstrated that emissions of Hexane, from emissions units B012, B013, and B014 are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

(9) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in

greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[PTI P0106678]

(10) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[PTI P0106678]

(11) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[PTI P0106678]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or #2 fuel oil was burned in the emissions unit. These reports shall be submitted to Ohio EPA, Northwest District Office (NWDO) within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

(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 fuel oil usage limitation for this emissions unit;

ii. allexceedances of the #2 fuel oil sulfur restriction.

b. the probable cause of each deviation (excursion);

any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

c. the magnitude and duration of each deviation (excursion).

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

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

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

(3) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NO_x monitoring system:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of NO_x emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapters 3745-14 and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).

b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

i. the facility name and address;

ii. the manufacturer and model number of the continuous NO_x and other associated monitors;

iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;

iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;

v. the total NO_x emissions for the calendar quarter (tons);

vi. the total operating time (hours) of the emissions unit;

vii. the total operating time of the continuous NO_x monitoring system while the emissions unit was in operation;

viii. results and dates of quarterly cylinder gas audits;

ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));

x. unless previously submitted, the results of any relative accuracy test audit showing the continuous NO_x monitor out-of-control and the compliant results following any corrective actions;

xi. the date, time, and duration of any/each malfunction** of the continuous NO_x monitoring system, emissions unit, and/or control equipment;

xii. the date, time, and duration of any downtime** of the continuous NO_x monitoring system and/or control equipment while the emissions unit was in operation; and

xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

** each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit

[OAC rule 3745-77-07(C)(1), 40 CFR 60.7 and PTI P0106678]

(4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

[PTI P0106678]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. When the emissions unit is first fired with #2 fuel oil for purposes other than routine "maintenance" procedures (i.e. monthly checks to verify the operating condition of the boiler), the permittee shall conduct testing within 60 days after the initial firing with #2 fuel oil to demonstrate compliance with the following when firing #2 fuel oil:

i. 0.12 pound NOx per mmBtu; and

ii. 0.037 pound CO per mmBtu.

b. The following test methods shall be employed to demonstrate compliance with the above emission limitations:

i. for NOx, Methods 1-4 and 7E of 40 CFR Part 60, Appendix A; and

ii. for CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

c. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, NWDO.

d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, NWDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, NWDO shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures

provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

e. A comprehensive written report of the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

[Note: In accordance with the General Provisions of 40 CFR Part 60, a written report of the results of the emission test(s) must be provided within the deadline specified in f)(1)a.]

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

(2) Compliance with the emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations: Natural Gas Combustion

0.04 pound NOx/mmBtu

31.54 tons NOx/rolling, 12-month period

Applicable Compliance Method

The pound/mmBtu limitation is based on the burner manufacturer's guarantee. Compliance with the pound/mmBtu limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 7E of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was established by multiplying the pound/mmBtu limitation by a maximum heat input of180 mmBtu/hour and a maximum operating schedule of 8,760 hours/year and dividing by 2,000 pounds/ton. Therefore, provided compliance is demonstrated with the pound/mmBtu limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

b. Emission Limitations: Natural Gas Combustion

0.075 pound CO/mmBtu

59.13 tons CO/rolling, 12-month period

Applicable Compliance Method

The pound/mmBtu limitation is based on the burner manufacturer's guarantee. Compliance with the pound/mmBtu limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 10 of

40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was established by multiplying the pound/mmBtu limitation by a maximum heat input of 180 mmBtu/hour and a maximum operating schedule of 8,760 hours/year and dividing by 2,000 pounds/ton. Therefore, provided compliance is demonstrated with the pound/mmBtu limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

c. Emission Limitations: Natural Gas Combustion

0.015 pound PM_{10}/mmBtu

11.83 tons PM_{10}/rolling, 12-month period

Applicable Compliance Method

The pound/mmBtu limitation is based on the burner manufacturer's guarantee. If required, compliance with the pound/mmBtu limitation shall be demonstrated in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

The annual emission limitation was established by multiplying the pound/mmBtu limitation by a maximum heat input of 180 mmBtu/hour and a maximum operating schedule of 8,760 hours/year and dividing by 2,000 pounds/ton. Therefore, provided compliance is demonstrated with the pound/mmBtu limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

d. Emission Limitations: #2 Fuel Oil Combustion

0.12 pound NOx/mmBtu

18.36 tons NOx/rolling, 12-month period

Applicable Compliance Method

The pound/mmBtu limitation is based on the burner manufacturer's guarantee. Compliance with the pound/mmBtu limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 7E of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was established by multiplying the pound/mmBtu limitation by the maximum #2 fuel oil restriction of 2,142,833 gallons/year, a heat content of 0.1428 mmBtu/gallon for #2 fuel oil and dividing by 2,000 pounds/ton. Therefore, provided compliance with the pound/mmBtu limitation and the annual

#2 fuel oil restriction are demonstrated [recordkeeping requirement d)(4)], compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

e. Emission Limitations: #2 Fuel Oil Combustion

0.037 pound CO/mmBtu

5.66 tons CO/rolling, 12-month period

Applicable Compliance Method

The pound/mmBtu limitation is based on the burner manufacturer's guarantee. Compliance with the pound/mmBtu limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was established by multiplying the pound/mmBtu limitation by the maximum #2 fuel oil restriction of 2,142,833 gallons/year, a heat content of 0.1428 mmBtu/gallon for #2 fuel oil and dividing by 2,000 pounds/ton. Therefore, provided compliance with the pound/mmBtu limitation and the annual #2 fuel oil restriction are demonstrated [recordkeeping requirement d)(4)], compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

f. Emission Limitations: #2 Fuel Oil Combustion

0.02 pound PM_{10}/mmBtu

3.06 tons PM_{10}/rolling, 12-month period

Applicable Compliance Method

The pound/mmBtu limitation is based on the burner manufacturer's guarantee. If required, compliance with the pound/mmBtu limitation shall be demonstrated in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

The annual emission limitation was established by multiplying the pound/mmBtu limitation by the maximum #2 fuel oil restriction of 2,142,833 gallons/year, a heat content of 0.1428 mmBtu/gallon for #2 fuel oil and dividing by 2,000 pounds/ton. Therefore, provided compliance with the pound/mmBtu limitation and the annual #2 fuel oil restriction are demonstrated [recordkeeping requirement d)(4)], compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

g. Emission Limitations: Natural Gas Combustion

0.0054 pound VOC/mmBtu

4.25 tons VOC/year

Applicable Compliance Method

The pound/mmBtu limitation was derived by dividing the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4 (7/98) of 5.5 pounds VOC/mmscf by 1,020 Btu/scf. If required, compliance with the pound/mmBtu limitation shall be demonstrated based on the results of emissions testing conducted in accordance with Methods 1-4 and 18 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was established by multiplying the pound/mmBtu limitation by a maximum heat input of 180 mmBtu/hour and a maximum operating schedule of 8,760 hours/year and dividing by 2,000 pounds/ton. Therefore, provided compliance is demonstrated with the pound/mmBtu limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

h. Emission Limitations: Natural Gas Combustion

0.0006 pound SO_2/mmBtu

0.48 ton SO_2/year

Applicable Compliance Method

The pound/mmBtu limitation was derived by dividing the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4 (7/98) of 0.6 pound SO_2/mmscf by 1,020 Btu/scf. If required, compliance with the pound/mmBtu limitation shall be demonstrated based on the results of emissions testing conducted in accordance with Methods 1-4 and 6C of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was established by multiplying the pound/mmBtu limitation by a maximum heat input of 180 mmBtu/hour and a maximum operating schedule of 8,760 hours/year and dividing by 2,000 pounds/ton. Therefore, provided compliance is demonstrated with the pound/mmBtu limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

i. Emission Limitations: #2 Fuel Oil Combustion

0.0014 pound VOC/mmBtu

0.21 ton VOC/year

Applicable Compliance Method

The pound/mmBtu limitation was derived by dividing the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3 (5/10) of 0.2 pound VOC/10^3 gallons by 140 mmBtu/10^3 gallons. If required, compliance with the pound/mmBtu limitation shall be demonstrated based on the results of emissions testing conducted in accordance with Methods 1-4 and 18 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was established by multiplying the AP-42 emission factor by the maximum #2 fuel oil restriction of 2,142,833 gallons/year, and dividing by 2,000 pounds/ton. Therefore, provided compliance with the pound/mmBtu limitation and the annual #2 fuel oil restriction are demonstrated [recordkeeping requirement d)(4)], compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

j. Emission Limitations: #2 Fuel Oil Combustion

0.0015 pound SO_2/mmBtu

0.23 ton SO_2/rolling 12-month period

Applicable Compliance Method

The pound/mmBtu limitation was derived by dividing the emission factor of 0.213 pound SO_2/10^3 gallons from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3 (5/10), based on a sulfur content restriction of 0.0015%, by 140 mmBtu/10^3 gallons. If required, compliance with the pound/mmBtu limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 6C of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was established by multiplying the AP-42 emission factor by the maximum #2 fuel oil restriction of 2,142,833 gallons/year, and dividing by 2,000 pounds/ton. Therefore, provided compliance with the pound/mmBtu limitation and the annual #2 fuel oil restriction are demonstrated [recordkeeping requirement d)(4)], compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

k. Emission Limitation:

Visible particulate emissions, while burning natural gas, shall not exceed 20 percent (20%) opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance with the visible emission limitation shall be determined in accordance with OAC rule 3745-17-03(B).

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

l. Emission Limitation:

Visible particulate emissions, while burning #2 fuel oil, shall not exceed 20 percent (20%) opacity, as a six-minute average, except for one 6-minute period per hour of not more than 27 percent (27%) opacity.

Applicable Compliance Method

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in “Appendix on Test Methods” in 40 CFR, Part 60 (“Standards of Performance for New Stationary Sources”).

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

g) Miscellaneous Requirements

(1) None.

2. F001, Paved and Unpaved Parking Lots and Roads

Operations, Property and/or Equipment Description:

Paved and unpaved roadways and parking areas

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 3745-17-07(B)	See b)(2)a.
b.	OAC rule 3745-17-08(B)	See b)(2)b.

(2) Additional Terms and Conditions

a. This emissions unit is exempt from the visible emissions limitations specified in OAC rule 3745-17-07(B), pursuant to OAC rule 3745-17-07(B)(11)(e).

b. This facility is not located within an "Appendix A" area as identified in OAC rule 3745-17-08 (it is located in Henry County). Therefore, pursuant to OAC rule 3745-17-08(A), this emissions unit is exempt from the requirements of OAC rule 3745-17-08(B).

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

3. P016, Anaerobic Digesters

Operations, Property and/or Equipment Description:

Anaerobic digester system controlled by a flare

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 3745-17-11(B)	See b)(2)a.
b.	OAC rule 3745-17-07(B)(1)	See b)(2)b.
c.	OAC rule 3745-18-06(E)	See b)(2)c.

(2) Additional Terms and Conditions

a. The uncontrolled mass rate of particulate emissions from this emissions unit is less than 10 pounds per hour. Pursuant to OAC rule 3745-17-11(A)(2)(a)(ii), Figure II of OAC rule 3745-17-11 does not apply. In addition, Table I of OAC rule 3745-17-11 does not apply because the process weight rate is equal to zero. Process weight is defined in OAC rule 3745-17-01(B)(17).

b. This emissions unit is exempt from the visible PE limitations specified in OAC rule 3745-17-07(A) pursuant to OAC rule 3745-17-07(A)(3)(h) because the emissions unit is not subject to the requirements of OAC rule 3745-17-11.

c. OAC rule 3745-18-06(E) does not apply because the process weight rate is equal to zero. Process weight is defined in OAC rule 3745-18-01(B)(14).

c) Operational Restrictions

(1) None

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) None.

f) Testing Requirements

(1) None.

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -B013 and B014: B013,B014,

EU ID	Operations, Property and/or Equipment Description
B013	180 mmBtu/hr, natural gas fired steam boiler, equipped with #2 fuel oil backup and continuous emissions monitor (CEM)
B014	180 mmBtu/hr, natural gas fired steam boiler, equipped with #2 fuel oil backup and continuous emissions monitor (CEM)

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) b)(1)c., b)(1)j., d)(8), d)(9), d)(11) 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 3745-31-05(D) (PTI P0106678 issued 12/14/10)	Opacity Restrictions [See b)(2)g. and b)(2)h.] See b)(2)a. and b)(2)b. <u>Emissions from Natural Gas Usage:</u> 0.04 pound nitrogen oxides (NOx)/mmBtu; 31.54 tons NOx/year 0.01 pounds particulate matter 10 microns or less in size (PM_{10})/mmBtu; 7.88 tons PM_{10}/year <u>Emissions from #2 Fuel Oil Usage:</u> 0.10 pound NOx/mmBtu; 7.88 tons NOx/rolling, 12-month period 0.02 pound PM_{10}/mmBtu; 1.58 tons PM_{10}/rolling, 12-month period 0.0015 pound SO_2/mmBtu; 0.12 ton SO_2/rolling 12-month period
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI P0106678 issued 12/14/10)	See b)(2)c. <u>Emissions from Natural Gas Usage:</u>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.0054 pound volatile organic compounds (VOC)/mmBtu; 4.25 tons VOC/year 0.0006 pound sulfur dioxide (SO_2)/mmBtu; 0.48 ton SO_2/year <u>Emissions from #2 Fuel Oil Usage:</u> 0.0014 pound VOC/mmBtu; 0.11 ton VOC/year
c.	OAC rule 3745-31-05(A)(3), as effective 12/01/06	See b)(2)d.
d.	OAC rules 3745-31-10 through 3745-31-20	See b)(2)e. <u>Emissions from Natural Gas Usage:</u> 0.075 pound carbon monoxide (CO)/mmBtu; 59.13 tons CO/rolling, 12-month period <u>Emissions from #2 Fuel Oil Usage:</u> 0.037 pound CO/mmBtu; 2.92 tons CO/rolling, 12-month period
e.	ORC 3704.03(T)	See b)(2)f.
f.	OAC rule 3745-17-07(A)	See b)(2)g. and b)(2)h.
g.	OAC rule 3745-17-10(B)(1)	See b)(2)i.
h.	OAC rule 3745-18-06(D)	See b)(2)i.
i.	OAC rule 3745-110-03(C)	See b)(2)i.
j.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(8) through d)(11)
k.	40 CFR Part 60, Subpart Db (40 CFR 60.40b – 60.49b)	See b)(2)h. and b)(2)j.
l.	40 CFR Part 63, Subpart JJJJJJ	See b)(2)l.

(2) Additional Terms and Conditions

a. Permit to install (PTI) P0106678 establishes the following federally enforceable emission limitations for purposes of limiting potential to emit (PTE) to avoid Prevention of Significant Deterioration (PSD). The federally enforceable emission limitations are based on the operational restrictions contained in c)(1) which limits fuel usage type and the burner design performance specifications for each fuel:

i. emission limitation for natural gas fuel use:

(a) 0.04 pound NOx per mmBtu; and

(b) 0.01 pound PM_{10} per mmBtu.

All emissions of particulate matter from the use of natural gas are PM_{10}.

The federally enforceable emission limitations established above for the use of natural gas result in an annual PTE of 31.54 tons NOx and 7.88 tons PM_{10}. Annual PTE levels were determined by multiplying the federally enforceable pound/mmBtu emission limitations by a maximum heat input of 180 mmBtu/hour and a maximum operating schedule of 8,760 hours/year and dividing by 2,000 pounds/ton. The annual PTE levels have been established in tons per year limitations [see b)(1)a.].

ii. emission limitation for #2 fuel oil use:

(a) 0.10 pound NOx per mmBtu;

(b) 0.0015 pound SO_2 per mmBtu; and

(c) 0.02 pound PM_{10} per mmBtu.

All emissions of particulate matter from the use #2 fuel oil are PM_{10}.

The annual PTE for emissions from the use of #2 fuel oil are limited further by additional federally enforceable requirements on #2 fuel usage [see b)(2)b., c)(2), and c)(3)]

b. This permit establishes the following additional federally enforceable emission limitations for purposes of limiting the annual PTE for emissions associated with the use of #2 fuel oil. The federally enforceable emission limitations are based on the operational restrictions contained in c)(3) which restrict #2 fuel oil usage:

i. 7.88 tons NOx per rolling, 12-month period;

ii. 2.92 tons CO per rolling, 12-month period;

iii. 1.58 tons PM_{10} per rolling, 12-month period;

iv. 0.12 ton SO_2/rolling, 12-month period.

c. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit for VOC. The requirements of this rule are equivalent to the requirements established pursuant to OAC rule 3745-31-05(D) for PM_{10} and SO_2; therefore, the permitteehas satisfied the Best Available Technology (BAT) requirements pursuant to OAC rule 3745-31-05(A)(3), as effective November 30, 2001, in this permit for PM_{10} and SO_2.

On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by state regulations for NAAQS pollutants 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 3745-31-05, then these emission limits/control measures no longer apply.

Until this rule revision is approved by the U.S. EPA, BAT requirements have been determined to be:

i. compliance with the fuel type and usage restrictions;

ii. compliance with the sulfur content restriction in c)(2);

iii. compliance with the emission limitations contained in b)(1)b;

iv. compliance with the PM_{10} and SO_2 emission limitations established under OAC rule 3745-31-05(D).

d. 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)(a) do not apply to the PM_{10}, VOC, and SO_2emissions from this air contaminant source, taking into account the following restrictions established in this permit which results in emissions for each pollutant of less than 10 tons per year:

i. fuel type and usage restrictions; and

ii. sulfur content restriction.

[Note: The worst case operating scenario for VOC emissions has been determined to be when the boiler is operated on natural gas at a rate of 8,760 hours/year. The worst case operating scenario for PM_{10} and SO_2 emissions has been determined to be when the boiler is operated at the maximum annual #2 fuel oil usage rate in c)(3) and with natural gas for the remainder of the year.]

iii. The potential to emit for VOC emissions from natural gas combustion is calculated based upon an emission factor of 5.5 pounds/10^6scf [AP-42 Chapter 1.4, 7/1998] multiplied by a conversion factor of 10^6scf/1020 mmBtu, a maximum heat input of 180 mmBtu/hour, and the maximum operating schedule of 8,760 hours/year, and then divide by 2,000 pounds/ton (4.25 TPY).

iv. The potential to emit of SO_2 from this emissions unit (0.55 TPY) is calculated by summing the SO_2 emissions from #2 fuel oil combustion at the maximum annual usage rate and the SO_2 emissions from the combustion of natural gas for the remainder of the year [estimated at 90% the maximum operating rate of 8,760 hours/year (7,884 hours/year)], where:

(a) The SO_2 emissions from #2 fuel oil combustion are based upon an emission factor of (142S) pounds/1000 gallons [AP-42 Chapter 1.3, (5/2010)], where S = the fuel sulfur content in percent by weight (0.0015). The annual emissions are estimated by multiplying the emission factor (0.213 lb/1000 gallons) by the maximum annual fuel usage restriction of 1,103,760 gallons/year, and then dividing by 2,000 pounds/ton (0.12 TPY).

(b) The SO_2 emissions from natural gas combustion are calculated based upon an emission factor of 0.6 pound/10^6scf [AP-42 Chapter 1.4, 7/1998] multiplied by a conversion factor of 10^6scf/1020 mmBtu, the maximum heat input of 180 mmBtu/hour, and the maximum operating schedule of 7,884 hours/year, and then divided by 2,000 pounds/ton (0.43 TPY).

v. The potential to emit of PM_{10} from this emissions unit (8.68 TPY) is calculated by summing the PM_{10} emissions from #2 fuel oil combustion at the maximum annual usage rate and the PM_{10} emissions from the combustion of natural gas for the remainder of the year [estimated at 90% the maximum operating rate of 8,760 hours/year (7,884 hours/year)], where:

(a) The PM_{10} emissions from #2 fuel oil combustion are based upon an emission factor of 0.02 lb/mmBtu [manufacturer's guarantee] multiplied by the maximum heat input of 180 mmBtu/hour, the maximum annual fuel usage restriction of 1,103,760 gallons/year, and then divided by the maximum hourly fuel usage rate of 1,260 gallons/hour and 2,000 pounds/ton (1.58 TPY).

(b) The PM_{10} emissions from natural gas combustion are calculated based upon an emission factor of 0.01 lb/mmBtu [manufacturer's guarantee] multiplied by the maximum heat input of 180 mmBtu/hour, and the maximum operating schedule of 7,884 hours/year, and then divided by 2,000 pounds/ton (7.10 TPY).

e. The permittee shall employ best available control technology (BACT) for this emissions unit. BACT has been determined to be the following emission limitations:

i. for natural gas usage: 0.075 pound CO per mmBtu; and 59.13 tons CO per rolling, 12-month period; and

ii. for #2 fuel oil usage: 0.037 pound CO per mmBtu; and 2.92 tons CO per rolling, 12-month period.

The BACT analysis determined that no add-on controls were cost effective for the reduction of CO.

f. The BAT requirements under ORC 3704.03(T) have been determined to be compliance with the pound per mmBtu requirements established pursuant to

OAC rule 3745-31-05(D) for NOx and OAC rules 3745-31-10 through 3745-31-20 for CO.

g. Visible particulate emissions while burning natural gas shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule. The visible particulate emission limitation established by 40 CFR Subpart Db is more stringent than OAC rule 3745-17-07(A) during #2 fuel oil use [see b)(2)h.]

h. Visible particulate emissions while burning #2 fuel oilshall not exceed 20 percent opacity, as a six-minute average, except for one 6-minute period per hour of not more than 27% opacity.

i. The emission limitation established by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).

j. Within 180 days of the effective date of this permit, the permittee shall develop and maintain a written quality assurance/quality control plan for the continuous NOx monitoring system, designed to ensure continuous valid and representative readings of NOx emissions in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous NOx monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

k. Prevention of Significant Deterioration (PSD) requirements for particulate matter equal to or less than 2.5 microns in size ($PM_{2.5}$) are being implemented through the PM_{10} Surrogate Policy issued by EPA in 1997. For purposes of demonstrating that PM_{10} is a reasonable surrogate for $PM_{2.5}$, all emissions of PM_{10} will be considered $PM_{2.5}$.

l. This emissions unit is exempt from the requirements of 40 CFR Part 63 Subpart JJJJJJ pursuant to 40 CFR 63.11195(e). #2 fuel oil is only to be used during natural gas curtailment, gas supply interruption, startups or periodic testing.

c) Operational Restrictions

(1) The permittee shall only burn natural gas or#2 fuel oil in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI P0106678]

(2) The #2 fuel oil combusted in this emissions unit shall only be #2 fuel oil, as defined by the American Society for Testing and Materials in ASTM D396-78, 89, 90, 92, 96, or 98, "Standard Specification for Fuel Oils". The sulfur content of the #2 fuel oil shall not exceed 0.0015 percent, by weight.

[OAC rule 3745-77-07(A)(1) and PTI P0106678]

(3) The following operational restrictions are being established for purposes of establishing federally enforceable requirements which limit PTE [see b)(2)b.].

a. The maximum #2 fuel oil usage for this emissions unit shall not exceed 1,103,760 gallons per year, based upon a rolling, 12-month summation of the monthly fuel usage.

This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the #2 fuel oil usage, upon issuance of this permit.

[OAC rule 3745-77-07(A)(1) and PTI P0106678]

d) Monitoring and/or Recordkeeping Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

(2) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the fuel oil type (number 2, 4, or 6), the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in pounds/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294,Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

(3) In lieu of the requirements of d)(2) for the sulfur content of #2 fuel oil, the permittee may keep records of fuel oil supplier certification, which shall include the following information:

a. The name of the oil supplier.

b. A statement from the oil supplier that the oil complies with the specifications under the definition of 'distillate oil' in 40 CFR 60.41c.

c. The sulfur content of the oil.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

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

a. the amount of #2 fuel oil burned, in gallons/month; and

b. the rolling, 12-month summation of the #2 fuel usage rates, in gallons.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

(5) Each continuous NOx monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2. At least 45 days before commencing certification testing of the continuous NOx monitoring system(s), the permittee shall develop and maintain a written quality assurance/quality control plan designed to ensure continuous valid and representative readings of NOx emissions from the continuous monitor(s), in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous NO_x monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

[OAC rule 3745-77-07(C)(1), 40 CFR 60.13, 40 CFR Part 60, Appendix F, and PTI P0106678]

(6) Prior to the installation of the continuous NOx monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the requirements in 40 CFR Part 60, Appendix B, Performance Specifications 2 for approval by the Ohio EPA, Central Office. The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous NOx monitoring system meets the requirements of Performance Specification 2. Once received, the letter/document of certification shall be maintained on-site and shall be made available to the director (the appropriate Ohio EPA District Office or local air agency) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

[OAC rule 3745-77-07(C)(1), 40 CFR 60.13, 40 CFR Part 60, Appendix B and PTI P0106678]

(7) The permittee shall install, operate, and maintain equipment to continuously monitor and record NOx emissions from this emissions unit in units of the applicable standard(s). The

continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Parts 60.

The permittee shall maintain records of data obtained by the continuous NOx monitoring system including, but not limited to:

a. emissions of NO_x in parts per million on an instantaneous (one-minute) basis;

b. emissions of NO_x in all units of the applicable standard(s) in the appropriate averaging period;

c. results of quarterly cylinder gas audits;

d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);

f. hours of operation of the emissions unit, continuous NO_x monitoring system, and control equipment;

g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NO_x monitoring system;

h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NO_x monitoring system; as well as,

i. the reason (if known) and the corrective actions taken (if any) for each such event in d)(7)g. and d)(7)h.

[OAC rule 3745-77-07(C)(1), 40 CFR 60.13, 40 CFR Part 60, Appendices B & F, and PTI P0106678]

(8) The permit to install application for emissions units B012, B013, and B014 was evaluated based on the actual materials and the design parameters of the emissions units' exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw

materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "2" hours per day and "" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: Hexane

TLV (mg/m3): 176.237

Maximum Hourly Emission Rate (lbs/hr): 0.97

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m3): 4.1

MAGLC (µg/m3): 4,196

The permittee, has demonstrated that emissions of Hexane, from emissions units B012, B013, and B014are calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[PTI P0106678]

(9) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the

change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute“ will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute“, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[PTI P0106678]

(10) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute“, ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute“, ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute“, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[PTI P0106678]

(11) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[PTI P0106678]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or #2 fuel oil was burned in the emissions unit. These reports shall be submitted to Ohio EPA, Northwest District Office (NWDO) within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

(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 fuel oil usage limitation for this emissions unit; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative fuel usage;

ii. allexceedances of the #2 fuel oil sulfur restriction.

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

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September),

unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

(3) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NO_x monitoring system:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of NO_x emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapters 3745-14 and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).

b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

i. the facility name and address;

ii. the manufacturer and model number of the continuous NO_x and other associated monitors;

iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;

iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;

v. the total NO_x emissions for the calendar quarter (tons);

vi. the total operating time (hours) of the emissions unit;

vii. the total operating time of the continuous NO_x monitoring system while the emissions unit was in operation;

viii. results and dates of quarterly cylinder gas audits;

ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));

x. unless previously submitted, the results of any relative accuracy test audit showing the continuous NO_x monitor out-of-control and the compliant results following any corrective actions;

xi. the date, time, and duration of any/each malfunction** of the continuous NO_x monitoring system, emissions unit, and/or control equipment;

xii. the date, time, and duration of any downtime** of the continuous NO_x monitoring system and/or control equipment while the emissions unit was in operation; and

xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

** each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit

[OAC rule 3745-77-07(C)(1), 40 CFR 60.7 and PTI P0106678]

(4) The permittee shall include any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the Toxic Air Contaminant Statute, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration, in the quarterly deviation (excursion) reports. If no changes to the emissions, emissions unit(s), or the exhaust stack have been made, then the report shall include a statement to this effect.

[PTI P0106678]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. When the emissions unit is first fired with #2 fuel oil for purposes other than routine “maintenance” procedures (i.e. monthly checks to verify the operating condition of the boiler), the permittee shall conduct testing within 60 days after the initial firing with #2 fuel oil to demonstrate compliance with the following when firing #2 fuel oil:

i. 0.10 pound NOx per mmBtu; and

ii. 0.037 pound CO per mmBtu.

b. The following test methods shall be employed to demonstrate compliance with the above emission limitations:

i. for NOx, Methods 1-4 and 7E of 40 CFR Part 60, Appendix A; and

ii. for CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

c. The test(s) shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA, NWDO.

d. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, NWDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, NWDO shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

e. A comprehensive written report of the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

[Note: In accordance with the General Provisions of 40 CFR Part 60, a written report of the results of the emission test(s) must be provided within the deadline specified in f)(1)a.]

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

(2) Compliance with the emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitations</u>: Natural Gas Combustion

0.04 pound NOx/mmBtu

31.54 tons NOx/rolling, 12-month period

Applicable Compliance Method

The pound/mmBtu limitation is based on the burner manufacturer's guarantee. Compliance with the pound/mmBtu limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 7E of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was established by multiplying the pound/mmBtu limitation by a maximum heat input of 180 mmBtu/hour and a maximum operating schedule of 8,760 hours/year and dividing by 2,000 pounds/ton. Therefore, provided compliance is demonstrated with the pound/mmBtu limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

b. Emission Limitations: Natural Gas Combustion

0.075 pound CO/mmBtu

59.13 tons CO/rolling, 12-month period

Applicable Compliance Method

The pound/mmBtu limitation is based on the burner manufacturer's guarantee. Compliance with the pound/mmBtu limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was established by multiplying the pound/mmBtu limitation by a maximum heat input of 180 mmBtu/hour and a maximum operating schedule of 8,760 hours/year and dividing by 2,000 pounds/ton. Therefore, provided compliance is demonstrated with the pound/mmBtu limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

c. Emission Limitations: Natural Gas Combustion

0.01 pound PM_{10}/mmBtu

7.88 tons PM_{10}/rolling, 12-month period

Applicable Compliance Method

The pound/mmBtu limitation is based on the burner manufacturer's guarantee. If required, compliance with the pound/mmBtu limitation shall be demonstrated in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO).

The annual emission limitation was established by multiplying the pound/mmBtu limitation by a maximum heat input of 180 mmBtu/hour and a maximum operating schedule of 8,760 hours/year and dividing by 2,000 pounds/ton. Therefore, provided compliance is demonstrated with the pound/mmBtu limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

d. Emission Limitations: #2 Fuel Oil Combustion

0.10 pound NOx/mmBtu

7.88 tons NOx/rolling, 12-month period

Applicable Compliance Method

The pound/mmBtu limitation is based on the burner manufacturer's guarantee. Compliance with the pound/mmBtu limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 7E of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was established by multiplying the pound/mmBtu limitation by the maximum #2 fuel oil restriction of 1,103,760 gallons/year, a heat content of 0.1428 mmBtu/gallon for #2 fuel oil and dividing by 2,000 pounds/ton. Therefore, provided compliance with the pound/mmBtu limitation and the annual #2 fuel oil restriction are demonstrated [recordkeeping requirement d)(4)], compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

e. Emission Limitations: #2 Fuel Oil Combustion

0.02 pound PM_{10}/mmBtu

1.58 tons PM_{10}/rolling, 12-month period

Applicable Compliance Method

The pound/mmBtu limitation is based on the burner manufacturer's guarantee. If required, compliance with the pound/mmBtu limitation shall be demonstrated in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA, Northwest District Office (NWDO). Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was established by multiplying the pound/mmBtu limitation by the maximum #2 fuel oil restriction of 1,103,760 gallons/year, a heat content of 0.1428 mmBtu/gallon for #2 fuel oil and dividing by 2,000 pounds/ton. Therefore, provided compliance with the pound/mmBtu limitation and the annual

#2 fuel oil restriction are demonstrated [recordkeeping requirement d)(4)], compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

f. Emission Limitations: Natural Gas Combustion

0.0054 pound VOC/mmBtu

4.25 tons VOC/year

Applicable Compliance Method

The pound/mmBtu limitation was derived by dividing the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4 (7/98) of 5.5 pounds VOC/mmscf by 1,020 Btu/scf. If required, compliance with the pound/mmBtu limitation shall be demonstrated based on the results of emissions testing conducted in accordance with Methods 1-4 and 18 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was established by multiplying the pound/mmBtu limitation by a maximum heat input of 180 mmBtu/hour and a maximum operating schedule of 8,760 hours/year and dividing by 2,000 pounds/ton. Therefore, provided compliance is demonstrated with the pound/mmBtu limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

g. Emission Limitations: Natural Gas Combustion

0.0006 pound SO_2/mmBtu

0.48 ton SO_2/year

Applicable Compliance Method

The pound/mmBtu limitation was derived by dividing the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4 (7/98) of 0.6 pound SO_2/mmscf by 1,020 Btu/scf. If required, compliance with the pound/mmBtu limitation shall be demonstrated based on the results of emissions testing conducted in accordance with Methods 1-4 and 6C of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was established by multiplying the pound/mmBtu limitation by a maximum heat input of 180 mmBtu/hour and a maximum operating schedule of 8,760 hours/year and dividing by 2,000 pounds/ton. Therefore, provided compliance is demonstrated with the pound/mmBtu limitation, compliance with the annual limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

h. Emission Limitations: #2 Fuel Oil Combustion

0.0014 pound VOC/mmBtu

0.11 ton VOC/year

Applicable Compliance Method

The pound/mmBtu limitation was derived by dividing the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3 (5/10) of 0.2 pound VOC/10^3 gallons by 140 mmBtu/10^3 gallons. If required, compliance with the pound/mmBtu limitation shall be demonstrated based on the results of emissions testing conducted in accordance with Methods 1-4 and 18 or 25A of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was established by multiplying the pound/mmBtu limitation by the maximum #2 fuel oil restriction of 1,103,760 gallons/year, a heat content of 0.1428 mmBtu/gallon for #2 fuel oil and dividing by 2,000 pounds/ton. Therefore, provided compliance with the pound/mmBtu limitation and the annual #2 fuel oil restriction are demonstrated [recordkeeping requirement d)(4)], compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

i. Emission Limitations: #2 Fuel Oil Combustion

0.0015 pound SO_2/mmBtu

0.12 ton SO_2/year

Applicable Compliance Method

The pound/mmBtu limitation was derived by dividing the emission factor of 0.213 pound SO_2/10^3 gallons from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3 (5/10), based on a sulfur content restriction of 0.0015%, by 140 mmBtu/10^3 gallons. If required, compliance with the pound/mmBtu limitation shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 6C of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

The annual emission limitation was established by multiplying the pound/mmBtu limitation by the maximum #2 fuel oil restriction of 1,103,760 gallons/year, a heat content of 0.1428 mmBtu/gallon for #2 fuel oil and dividing by 2,000 pounds/ton. Therefore, provided compliance with the pound/mmBtu limitation and the annual #2 fuel oil restriction are demonstrated [recordkeeping requirement d)(4)], compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

j. Emission Limitation:

Visible particulate emissions, while burning natural gas, shall not exceed 20 percent (20%) opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance with the visible emission limitation shall be determined in accordance with OAC rule 3745-17-03(B).

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

k. Emission Limitation:

Visible particulate emissions, while burning #2 fuel oil, shall not exceed 20 percent (20%) opacity, as a six-minute average, except for one 6-minute period per hour of not more than 27 percent (27%) opacity.

Applicable Compliance Method

If required, compliance with the visible emission limitation shall be determined in accordance with Test Method 9 as set forth in “Appendix on Test Methods” in 40 CFR, Part 60 (“Standards of Performance for New Stationary Sources”).

[OAC rule 3745-77-07(C)(1) and PTI P0106678]

g) Miscellaneous Requirements

(1) None.

5. Emissions Unit Group -Trine labelers: R001,R002,

EU ID	Operations, Property and/or Equipment Description
R001	Trine Labeler #1
R002	Trine Labeler #2

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) d)(2), d)(3), d)(4), d)(5).

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) (PTI #03-13124, issued 2/18/99)	1.52lbs organic compounds (OC)/hr and 6.66 tons OC/yr [See b)(2)a.]

(2) Additional Terms and Conditions

a. The 1.52 lbs OC/hr and the 6.66 tons OC/yr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall record and maintain each month the following information for this emissions unit:

a. the company identification for each adhesive material employed;

b. the number of gallons of each adhesive material employed;

c. the OC content of each adhesive material, in lbs OC/gallon, as applied;

d. the OC emission rate for each adhesive material, in tons/month [d)(1)b. x d)(1)c./2000];

e. the total OC emission rate for all adhesive materials, in tons/month [summation of d)(1)d.]; and

f. the annual, year-to-date, OC emissions from all adhesive materials employed [summation of d)(1)e. for each calendar month to date from January to December].

[OAC rule 3745-77-07(C)(1) and PTI #03-13124]

(2) The permit to install for this emissions unit (R001 and R002) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant:

Pollutant: tetrahydrofuran

TLV (ug/m3): 590,000

Maximum Hourly Emission Rate (lbs/hr): 3.03

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 182.8

MAGLC (ug/m3): 14,047.6

[PTI #03-13124]

(3) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

[PTI #03-13124]

(4) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

[PTI #03-13124]

(5) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[PTI #03-13124]

e) Reporting Requirements

(1) The permittee shall submit annual reports that specify the total OC emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[OAC rule 3745-77-07(C)(1) and PTI #03-13124]

f) Testing Requirements

(1) Compliance with the emission limitations in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions limitations: 1.52 lbs OC/hr and 6.66 tons OC/yr

Applicable compliance method: The permittee may determine compliance with the hourly allowable OC emission limitation by multiplying the maximum adhesive

coating usage rate (0.20 gallon/hr) by the maximum OC content of all the adhesive coatings employed (7.59 lbs/gallon).

If required, compliance with the hourly allowable OC mission limitation above shall be determined in accordance with Methods 18, 25 or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly emission limitation by the maximum operating schedule of 8760 hours per year and then dividing by 2000 pounds per ton. Therefore, provided compliance is maintained with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #03-13124]

g) Miscellaneous Requirements

(1) None.