



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

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Mailing Address:

Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

**RE: DRAFT PERMIT TO INSTALL
CUYAHOGA COUNTY
Application No: 13-3602**

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
X	SYNTHETIC MINOR
X	CEMS
	MACT
X	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: December 1, 1999

Medical Center Company
Ed Christiansen
2250 Circle Drive
Cleveland, OH 44106-2664

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of \$400 will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
CLEVELAND DIVISION OF THE ENVIRONMENT
Pennsylvania Department of Environmental Resources



DRAFT PERMIT TO INSTALL 13-3602

Application Number: 13-3602

APS Premise Number: 1318003059

Permit Fee: **To be entered upon final issuance**

Name of Facility: Medical Center Company

Person to Contact: Ed Christiansen

Address: 2250 Circle Drive

Cleveland, OH 44106-2664

Location of proposed air contaminant source(s) [emissions unit(s)]:

**2250 Circle Drive
Cleveland, Ohio**

Description of proposed emissions unit(s):

122.9 MMBTU/HR NATURAL GAS/ (NUMBER 2 FUEL OIL STANDBY) FIRED BOILER FOR SPACE HEATING.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.11

below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. 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 CFR 68.215(a), the permittee shall submit either of the following:

- a. a compliance plan for meeting the requirements of 40 CFR Part 68 by the date specified in 40 CFR 68.10(a) and OAC 3745-104-05(A); or
- b. as part of the compliance certification submitted under 40 CFR 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 CFR Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

4. 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.

5. 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.

6. 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. 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.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. 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.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- 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:
 - i. 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.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

- ii. 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.

10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35 , the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the 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 (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., 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.)

3. 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.

4. 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.

5. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be

extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

6. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

7. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

8. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

9. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

10. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

11. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

Pollutant	Tons Per Year From Burning	
	Natural Gas	No. 2 Oil
PM	5.38	1.31
NO _x	20.1	4.21
SO ₂	---	8.71
CO	39.8	3.30
OC	5.91	---

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Boiler for steam generation. Rated 122.9 MMBtu/hr when natural gas firing and 117.7 MMBtu/hr when No.2 fuel oil firing	OAC rule 3745-17-07	20% opacity as a six-minute average, except as provided by rule
	OAC rule 3745-17-10(B)(1)	0.02 lb/MMBtu of PM Less Stringent than emission limit established through OAC 3745-31-05(A)(3)
	OAC rule 3745-18-06(D)	1.6 lb/MMBtu of SO2 Less Stringent than emission limit established through OAC 3745-31-05(A)(3)
	40 CFR Part 60 Subpart Db	0.1 lb/MMBtu of N0x Emission limit equal to limit established through OAC 3745-31-05(A)(3) 0.1 lb/MMBtu of PM Less Stringent than emission limit established through OAC 3745-31-05(A)(3)
	OAC rule 3745-31-05(D)	From burning No.2 fuel oil: 8.71 TPY S02 as a 12-month rolling summation 4.21 TPY N0x as a 12-month rolling summation

2. Additional Terms and Conditions

2.a A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

2.b The permittee shall monitor steam generating unit operating conditions and predict nitrogen oxides emission rates as specified in a plan submitted pursuant to Sec. 60.49b(c) of 40CFR Part 60.

II. Operational Restrictions

1. The permittee shall burn only natural gas and/or very low sulfur No.2 fuel oil in this emissions unit.
2. The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.
3. The maximum annual operating hours for this emissions unit while burning No.2 fuel oil shall not exceed 720 hrs, based upon a rolling, 12-month summation of the operating hours.
4. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the operating hours specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Operational hours while burning No.2 fuel oil hours/month</u>
1	60
1-2	120
1-3	180
1-4	240
1-5	300
1-6	360
1-7	420
1-8	480
1-9	540
1-10	600
1-11	660
1-12	720

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual hours limitation for this emissions unit while burning No.2 fuel oil shall be based upon a rolling, 12-month summation of the operating hours.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall obtain and maintain at the affected facility fuel receipts from the fuel supplier which certify that the oil meets the definition of “very low sulfur oil”, per Section 60.49b(r) of Subpart Db.
 - a. So long as this emissions unit combusts only “very low sulfur oil” the permittee shall be exempt from the sulfur dioxide compliance and performance testing requirements of Section 60.45b and the sulfur dioxide emission monitoring requirement of Section 60.47b of Subpart Db.
 - b. Subpart Db states that “very low sulfur oil” means an oil that contains no more than 0.5 percent weight of sulfur or that, has a sulfur dioxide emission rate equal to or less than 0.5 lb/million BTU heat input.
2. For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.
4. Per 40CFR Part 60 Subpart Db 60.49b(c):

The owner or operator of each affected facility subject to the nitrogen oxides standard of Sec. 60.44b who seeks to demonstrate compliance with those standards through the monitoring of steam generating unit operating conditions under the provisions of Sec. 60.48b(g)(2) shall submit to the Administrator for approval a plan that identifies the operating conditions to be monitored under Sec. 60.48b(g)(2) and the records to be maintained under Sec. 60.49b(j). This plan shall be submitted to the Administrator for approval within 360 days of the initial startup of the affected facility. The plan shall:

- a. Identify the specific operating conditions to be monitored and the relationship between these operating conditions and nitrogen oxides emission rates (i.e., ng/J or lbs/million Btu heat input). Steam generating unit operating conditions include, but are not limited to, the degree of staged combustion (i.e., the ratio of primary air to secondary and/or tertiary air) and the level of excess air (i.e., flue gas oxygen level);
- b. Include the data and information that the owner or operator used to identify the relationship between nitrogen oxides emission rates and these operating conditions;
- c. Identify how these operating conditions, including steam generating unit load, will be

Medical Center Company

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Date: To be entered upon final issuance

Facility ID: **1318003059**

Emissions Unit ID: **B016**

monitored under Sec. 60.48b(g) on an hourly basis by the owner or operator during the period of operation of the affected facility; the quality assurance procedures or practices that will be employed to ensure that the data generated by monitoring these operating conditions will be representative and accurate; and the type and format of the records of these operating conditions, including steam generating unit load, that will be maintained by the owner or operator under Sec. 60.49b(j).

If the plan is approved, the owner or operator shall maintain records of predicted nitrogen oxide emission rates and the monitored operating conditions, including steam generating unit load, identified in the plan.

5. An acceptable alternative to the term conditions in sections A.I.2.b and A.III.4 would be the installation and operation of a NO_x monitor pursuant to 40CFR Part 60 Subpart Db.
6. The permittee shall maintain monthly records of the following information:
 - a. the operating hours for each month.
 - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the operating hours.

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

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. Pursuant to 40 CFR Parts 60.7 and 60.13(h), 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 opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).
3. 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 any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.
4. If there are no excess emissions during the calendar quarter, the permittee shall submit a statement

to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

- 5. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative operating hours levels. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

V. Testing Requirements

- 1. Emission Limitation -

20% opacity, as a six-minute average

Applicable Compliance Method(s) -

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1) using the methods and procedures specified in USEPA Reference Method 9.

- 2. Emission Limitation -

0.020 lb/MMBtu PM

Applicable Compliance Method -

See A.V.7.

- 3. Emission Limitation -

1.6 lbs/MMBtu SO2

Applicable Compliance Method -

Compliance with the above limitation shall be based on the recordkeeping requirement in Section A.III.1 of this permit.

4. Emission Limitation -

0.1 lb/MMBtu PM from 40 CFR Part 60

Applicable Compliance Method -

See A.V.7.

5. Emission Limitation -

0.1 lb/MMBtu NO_x from 40 CFR Part 60

Applicable Compliance Method -

Per 40CFR Part 60 Subpart Db 60.46b(e):

For the initial compliance test, nitrogen oxides from the steam generating unit are monitored for 30 successive steam generating unit operating days and the 30-day average emission rate is used to determine compliance with the nitrogen oxides emission standards under Sec. 60.44b. The 30-day average emission rate is calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period.

Following the date on which the initial performance test is completed or required to be completed under Sec. 60.8 of this part, whichever date comes first, the owner or operator of an affected facility which has a heat input capacity of 73 MW (250 million Btu/hour) or less and which combusts natural gas, distillate oil, or residual oil having a nitrogen content of 0.30 weight percent or less shall upon request determine compliance with the nitrogen oxides standards under Sec. 60.44b through the use of a 30-day performance test. During periods when performance tests are not requested, nitrogen oxides emissions data collected pursuant to Sec. 60.48b(g)(1) or Sec. 60.48b(g)(2) are used to calculate a 30-day rolling average emission rate on a daily basis and used to prepare excess emission reports, but will not be used to determine compliance with the nitrogen oxides emission standards. A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all of the hourly nitrogen oxides emission data for the preceding 30 steam generating unit operating days.

Compliance with the above limitation shall be based on the recordkeeping requirement in Section A.III.4 of this permit.

6. Emission Limitation -

From burning No.2 fuel oil:

8.71 TPY SO₂ as a 12-month rolling summation

4.21 TPY NO_x as a 12-month rolling summation

Medical Center Company

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Date: To be entered upon final issuance

Facility ID: **1318003059**

Emissions Unit ID: **B016**

Applicable Compliance Method -

Compliance with the above limitation shall be based on the recordkeeping requirement in Section A.III.3 and 4. of this permit.

7. Within 3 months after issuance, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the allowable mass emission rate(s) for particulates. The test(s) shall be conducted in accordance with the test methods and procedures specified in Method 5 of 40 CFR Part 60, Appendix A for particulates while the emissions unit is operating at or near maximum capacity and using only No.2 fuel oil.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(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 field office's refusal to accept the results of the emissions test(s).

Personnel from the Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment and acquire data and information regarding the emissions unit operating parameters.

A comprehensive written report on the results of the emission test(s) shall be submitted within 30 days following completion of the test(s).

VI. Miscellaneous Requirements

1. This source is subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and,
- d. date of performance testing (If required, at least 30 days prior to testing).

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Date: To be entered upon final issuance

Facility ID: **1318003059**

Emissions Unit ID: **B016**

Reports are to be sent to:

Ohio Environmental Protection Agency

DAPC - Permit Management Unit

P.O. Box 163669

Columbus, OH 43216-3669

and

The Cleveland Bureau of Air Pollution Control

1925 St. Clair Ave.

Cleveland, Ohio 44114

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Boiler for steam generation. Rated 122.9 MMBtu/hr when natural gas firing and 117.7 MMBtu/hr when No.2 fuel oil firing	OAC rule 3745-31-05(A)(3)	From burning Natural Gas: 1.23 lbs/hr PM, 5.38 TPY 4.60 lbs/hr NOx, 20.1 TPY 9.09 lbs/hr CO, 39.8 TPY 1.35 lbs/hr OC, 5.91 TPY From burning No.2 Fuel Oil: 2.35 lbs/hr PM, 1.31 TPY 11.7 lbs/hr NOx, 4.21 TPY 9.18 lbs/hr CO, 3.30 TPY 24.2 lbs/hr SO ₂ , 8.71 TPY See B.I.2b.

2. Additional Terms and Conditions

- 2.a Burning of No.2 fuel oil in this emissions unit shall be limited to 720 hours per year.
- 2.b The use of natural gas as the primary fuel for burning in this emissions unit is required to satisfy the BAT requirements in OAC 3745-31-05. The emissions unit is also equipped with a Low Nox burner.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

1. From burning Natural Gas

a. Emission Limitation -

1.23 lbs/hr PM, 5.38 TPY

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (122.9 MMBtu/hr) by the manufacturer's emission factor for PM (0.01 lbs particulate/MMBtu). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lb/ton to arrive at the TPY emission rate.

b. Emission Limitation -

4.60 lbs/hr NO_x, 20.1 TPY

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (122.9 MMBtu/hr) by the manufacturer's emission factor for NO_x (0.0375 lbs NO_x/MMBtu low NO_x burner). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lb/ton to arrive at the TPY emission rate.

c. Emission Limitation -

9.09 lbs/hr CO, 39.8 TPY

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (122.9 MMBtu/hr) by the manufacturer's emission factor for CO (0.074 lb CO/MMBtu). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lb/ton to arrive at the TPY emission rate.

d. Emission Limitation -

1.35 lbs/hr OC, 5.91 TPY

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (122.9 MMBtu/hr) by the AP-42 emission factor for OC (11.0 lbs OC/MMcuft) and the heat value for natural gas (1cuft/1000 Btu). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the TPY emission rate.

2. From burning No. 2 Fuel Oil

a. Emission Limitation -

2.35 lbs/hr PM, 1.31 TPY

Applicable Compliance Method -

See A.V.7

b. Emission Limitation -

11.7 lbs/hr NO_x, 4.21 TPY

Applicable Compliance Method -

See A.V.5.

c. Emission Limitation -

9.18 lbs/hr CO, 3.30 TPY

Applicable Compliance Method -

Compliance shall be based upon multiplying the maximum hourly heat input of the emissions unit (117.7 MMBtu/hr) by the manufacturer's emission factor for CO (0.078 lb CO/MMBtu). This lb/hr total is multiplied by the operation hours of the emissions unit and divided by 2000 lbs/ton to arrive at the TPY emission rate.

d. Emission Limitation -

24.2 lbs/hr SO₂, 8.71 TPY

Applicable Compliance Method -

Compliance shall be based upon the recordkeeping requirement in Section A.III.1 and 6.

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VI. Miscellaneous Requirements

None.