

Facility ID: 0679000286 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0679000286 Emissions Unit ID: P004 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
Ajax 384 Hp natural gas compressor engine (DPC-2802 LE)	OAC rule 3745-31-05(A)(3) PTI #06-08266	Formaldehyde emissions shall not exceed 6.0 lb/day; 1.11 ton/yr. See Section A.2.a. below.
	ORC rule 3704.03(T)(4)	See Section A.2.b. below.
	OAC rule 3745-17-11(B)(5)(a)	Particulate emissions shall not exceed 0.310 lb/million Btu actual heat input.
	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 % opacity , as a six minute average.
	OAC rule 3745-21-08(B)	See Section A.2.c below.
	OAC rule 3745-18-06(G)	Exempt. See Section A.2.d below.

2. Additional Terms and Conditions

- (a) Emission limits for formaldehyde have been established, as required by SB 265, because the predicted impact is greater than 80% of the Maximum Acceptable Ground-Level Concentration (MAGLC). These emission limits represent the potential emissions from the source at it's rated capacity, operating 8760 hours per year. Therefore, no additional recordkeeping or reporting requirements are necessary to document ongoing compliance.
The Best Available Technology (BAT) requirements under 3745-31-05(A)(3) do not apply to the VOC, NOx, CO or the particulate emissions from this air contaminant source since the uncontrolled potential to emit for VOC, NOx, CO and particulate emissions is less than ten tons per year.
The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.
This emissions unit is exempt from the requirements of OAC rule 3745-18-06(G) pursuant to OAC rule 3745-18-06(B).

B. Operational Restrictions

1. The permittee shall burn only natural gas in this emission unit.

C. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permit to install for this emissions unit was evaluated based on the actual 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 to this emissions unit for each toxic pollutant, using data from the permit to install application, and modeling was performed for the toxic pollutant(s) emitted at over a ton per year using the SCREEN 3.0 model or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the use of the SCREEN 3.0 (or other approved) model, was compared to the Maximum Acceptable Ground-

Level Concentration (MAGLC), calculated as required in Engineering Guide #70. The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Formaldehyde
 TLV (mg/m3): 0.272
 Maximum Hourly Emission Rate (lbs/hr): 0.25
 Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 6.22
 MAGLC (ug/m3): 6.47

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 or the use of new materials, that would result in the emission of a compound or chemical with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled, as documented in the most current version of the American Conference of Governmental Industrial Hygienists' (ACGIH's) handbook entitled "TLVs and BEIs, Threshold Limit Values for Chemical Substances and Physical Agents, Biological Exposure Indices";
 - 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.).
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) meet(s) the definition of a "modification" under other provisions of the rule, then the permittee shall obtain a final permit to install prior to the change.

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 the 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.
- D. **Reporting Requirements**
1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

E. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following methods:
 Emissions Limitation:
 Formaldehyde emissions shall not exceed 6.0 lb/day; 1.11 ton/yr.
 Applicable Compliance Method:
 Compliance shall be demonstrated by multiplying the controlled emission factor for formaldehyde provided by the manufacturer in PTI application 06-08266 received January 12, 2007 (0.3 g/ HP-HR * 1 lb/ 453.6g) by the maximum output capacity (384 HP); and, then multiplying this by the maximum annual hours of operation (8760 hrs/yr) and the conversion 1 ton/2000 lbs.
 Emission Limitation:
 Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.
 Applicable Compliance Method:
 If required, compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
 Emission Limitation:
 Particulate emissions shall not exceed 0.310 lb/million Btu actual heat input.
 Applicable Compliance Method:
 Compliance shall be based upon an emission factor of 0.31 lb/million Btu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96).
 If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

F. **Miscellaneous Requirements**

1. None