

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

11/27/2013

Certified Mail

Mr. Chad Brenneman  
PROCTER & GAMBLE MFG CO  
3875 Reservoir Road  
Lima, OH 45801

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0302020260  
Permit Number: P0115811  
Permit Type: Renewal  
County: Allen

Dear Permit Holder:

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

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

**How to appeal this permit**

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

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

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

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

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

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

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

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

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NWDO



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
PROCTER & GAMBLE MFG CO**

Facility ID:	0302020260
Permit Number:	P0115811
Permit Type:	Renewal
Issued:	11/27/2013
Effective:	11/27/2013
Expiration:	11/27/2018





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
**PROCTER & GAMBLE MFG CO**

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**Final Permit-to-Install and Operate**  
PROCTER & GAMBLE MFG CO  
**Permit Number:** P0115811  
**Facility ID:** 0302020260  
**Effective Date:** 11/27/2013

## Authorization

Facility ID: 0302020260  
Application Number(s): A0049239, A0049244  
Permit Number: P0115811  
Permit Description: Renewal FEPTIO for five natural gas-fired boilers.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 11/27/2013  
Effective Date: 11/27/2013  
Expiration Date: 11/27/2018  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

PROCTER & GAMBLE MFG CO  
MUMAUGH & RESERVOIR RD  
Lima, OH 45802

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

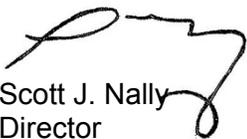
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0115811

Permit Description: Renewal FEPTIO for five natural gas-fired boilers.

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

- |                                   |   |
|-----------------------------------|---|
| <b>Emissions Unit ID:</b>         | <b>B021</b>                                   |
| Company Equipment ID:             | Boiler 3A                                     |
| Superseded Permit Number:         | P0112748                                      |
| General Permit Category and Type: | Not Applicable                                |
| <b>Emissions Unit ID:</b>         | <b>B100</b>                                   |
| Company Equipment ID:             | Misc. NG Fired Equipment (Lima Plant)         |
| Superseded Permit Number:         | P0104687                                      |
| General Permit Category and Type: | Not Applicable                                |
| <b>Emissions Unit ID:</b>         | <b>B101</b>                                   |
| Company Equipment ID:             | Misc NG Fired Equipment (Distribution Center) |
| Superseded Permit Number:         | P0104687                                      |
| General Permit Category and Type: | Not Applicable                                |

**Group Name: 25.7 mmBtu/hour boilers**

<b>Emissions Unit ID:</b>	<b>B018</b>
Company Equipment ID:	Boiler 1A
Superseded Permit Number:	P0112748
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B019</b>
Company Equipment ID:	Boiler 2A
Superseded Permit Number:	P0112748
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**  
PROCTER & GAMBLE MFG CO  
**Permit Number:** P0115811  
**Facility ID:** 0302020260  
**Effective Date:** 11/27/2013

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



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

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

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

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

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

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

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

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

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

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

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

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

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

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



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

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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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



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

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

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

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

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

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



**Final Permit-to-Install and Operate**  
PROCTER & GAMBLE MFG CO  
**Permit Number:** P0115811  
**Facility ID:** 0302020260  
**Effective Date:** 11/27/2013

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



**Final Permit-to-Install and Operate**  
PROCTER & GAMBLE MFG CO  
**Permit Number:** P0115811  
**Facility ID:** 0302020260  
**Effective Date:** 11/27/2013

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None



**Final Permit-to-Install and Operate**  
PROCTER & GAMBLE MFG CO  
**Permit Number:** P0115811  
**Facility ID:** 0302020260  
**Effective Date:** 11/27/2013

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



1. B021, Boiler 3A

Operations, Property and/or Equipment Description:

16.75 mmBtu/hour Natural Gas-Fired Boiler (Boiler 3A)

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., b)(2)b., c)(1), d)(1), e)(1), and f)(1)d.
- 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)	2.18 lbs of nitrogen oxides (NOx)/hour 1.68 lbs of carbon monoxide (CO)/hour 0.12 lb of particulate emissions (PE)/hour  Visible PE shall not exceed 10% opacity as a six-minute average  See b)(2)a.
b.	OAC rule 3745-31-05(D)	<u>For B018, B019, and B021 combined:</u> 17.30 tons of NOx/rolling 12-month period 13.30 tons of CO/rolling 12-month period 0.90 ton of PE/rolling 12-month period  See b)(2)b.
c.	OAC rule 3745-17-10(B)(1)	See b)(2)c.
d.	OAC rule 3745-17-07(A)	See b)(2)c.
e.	OAC rule 3745-18-06	See b)(2)d.
f.	40 CFR Part 60, Subpart Dc	See d)(1)a.



(2) Additional Terms and Conditions

- a. The “Best Available Technology” (BAT) requirement for this emissions unit has been determined to be compliance with the terms and conditions of this permit. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with 40 CFR Part 60, Subpart Dc.
- b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V permitting requirements. The federally enforceable emission limitations are based on the operational restriction in c)(1):
  - i. 17.30 tons of NOx/rolling 12-month period;
  - ii. 13.30 tons of CO/rolling 12-month period; and
  - iii. 0.90 ton of PE/rolling 12-month period.
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. This emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A)(3).

c) Operational Restrictions

- (1) The maximum annual natural gas usage for emissions units B018, B019, and B021 combined shall not exceed 266.30 million cubic feet (mmcf) per year, based upon a rolling 12-month summation of the monthly fuel usage rates.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the fuel usage levels specified in the following table:

Month	Maximum Allowable Cumulative Fuel Usage (mmcf)
1	25.00
1-2	50.00
1-3	75.00
1-4	100.00
1-5	125.00
1-6	150.00
1-7	170.00
1-8	190.00
1-9	210.00
1-10	230.00
1-11	250.00
1-12	266.30



After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual fuel usage limitation shall be based upon a rolling 12-month summation of the monthly fuel usage. [It should be noted that the first six months of operation has already occurred under PTIO #P0112748 issued on 06/03/2013.]

- (2) The permittee shall burn only pipeline quality natural gas in this emissions unit.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records of the following information:
    - a. The natural gas usage for each month, in mmcf;
    - b. For the first 12 months of operation following the issuance of this permit, the cumulative natural gas usage, in mmcf;
    - c. After the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of the natural gas usage, in mmcf;
    - d. The calculated emissions of NO<sub>x</sub>, CO, and PE, in tons; and
    - e. The rolling 12-month emissions of NO<sub>x</sub>, CO, and PE, in tons.
  - (2) For each day during which the permittee burns a fuel other than pipeline quality natural gas in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
    - a. All deviations of the following emission limitations, operational restrictions, and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:
      - i. For the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative fuel usage levels;
      - ii. After the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month natural gas usage limitation of 266.30 mmcf; and
      - iii. The rolling 12-month NO<sub>x</sub>, CO, and PE emissions.
    - b. The probable cause of each deviation;
    - c. Any corrective actions that were taken to remedy the deviations or prevent future deviations; and



- d. The magnitude and duration of each deviation.

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

These quarterly reports shall be submitted electronically through Ohio EPA Air Services by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation  
2.18 lbs of NOx/hour

Applicable Compliance Method

Compliance with the hourly emission limitation shall be determined by multiplying the vendor-supplied emission factor of 0.13 lb of NOx/mmBtu by the maximum heat input of 16.75 mmBtu/hour. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.



- b. Emission Limitation  
1.68 lbs of CO/hour

Applicable Compliance Method

Compliance with the hourly emission limitation shall be determined by multiplying the vendor-supplied emission factor of 0.10 lb of CO/mmBtu by the maximum heat input of 16.75 mmBtu/hour. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

- c. Emission Limitation  
0.12 lb of PE/hour

Applicable Compliance Method

Compliance with the hourly emission limitation shall be determined by multiplying the vendor-supplied emission factor of 0.007 lb of PE/mmBtu by the maximum heat input of 16.75 mmBtu/hour. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

- d. Emission Limitations  
17.30 tons of NOx/rolling 12-month period  
13.30 tons of CO/rolling 12-month period  
0.90 ton of PE/rolling 12-month period

Applicable Compliance Method

Compliance with the rolling 12-month limitations shall be demonstrated through the recordkeeping requirements in section d)(1).

- e. Emission Limitation  
Visible PE shall not exceed 10% opacity as a six-minute average

Applicable Compliance Method

If required, compliance shall be demonstrated using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources") and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- g) Miscellaneous Requirements

- (1) None



**2. B100, Miscellaneous Natural Gas-Fired Equipment (Lima Plant)**

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

Incidental Fuel Burning Equipment located at the Lima Plant

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)a., b)(2)b., c)(2), d)(2), e)(1), f)(1)a., and f)(1)b.
- 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)	26.10 tons of nitrogen oxides (NOx) per rolling 12-month period for emission units B100 and B101 combined (See b)(2)b.)  21.93 tons of carbon monoxide (CO) per rolling, 12-month period for emission units B100 and B101 combined (See b)(2)b.)
b.	OAC rule 3745-17-10(B)(1)	0.020 lb particulate emissions (PE)/mmBtuof actual heat input (See b)(2)c.)
c.	OAC rule 3745-17-11(B)	See b)(2)d.
d.	OAC rule 3745-17-07(A)(1)	Visible emissions shall not exceed 20% opacity as a six-minute average, except as specified by rule (See b)(2)e.)
e.	OAC rule 3745-18-06(A)	See b)(2)f.
f.	40 CFR Part 60 Subpart Db	See b)(2)g.



(2) Additional Terms and Conditions

- a. This emissions unit is comprised of all the current miscellaneous natural gas-fired heaters located at the Procter & Gamble "Lima Plant", located at 3875 Reservoir Road, Lima Ohio. This equipment consists of combustors #3-12, 14-18, 20-22, 24-36, 38-40, 45-49, the heaters for the phoenix project, construction services, storeroom, break room, and central lab, four space heaters, and four heaters for Spine logistics areas with a total heat input capacity of 72.753 mmBTU/hour.
- b. This permit establishes the following federally enforceable emission limitations based on a fuel usage restriction in c)(2) for purposes of limiting potential to emit:
  - i. 26.10 tons of NOx per rolling, 12-month period; and
  - ii. 21.93 tons of CO per rolling, 12-month period.

The permittee has requested these federally enforceable limitations for the purpose of avoiding Title V applicability.

- c. The individual pieces of equipment which make up this emissions unit where fuel is burned for the primary purpose of producing heat or power by indirect heat transfer, and have a heat input capacity of 1.00 mmBtu/hr or greater, are subject to the emission limitation established under OAC rule 3745-17-10(B)(1).
- d. The individual pieces of fuel burning equipment associated with this emissions unit that are potentially affected by OAC rule 3745-17-11 (those pieces where fuel is burned for the primary purpose of producing heat or power by direct heat transfer) are deemed exempt from the requirements of OAC rule 3745-17-11 because the process weight rate equals zero.
- e. The individual pieces of equipment which comprise this emissions unit that are subject to the requirements established under OAC rule 3745-17-10 are subject to the visible PE limitation specified above.

The remaining individual pieces of equipment which make up this emissions unit are exempt from the visible PE limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-10 and OAC rule 3745-17-11 are not applicable.

- f. The individual pieces of equipment which make up this emissions unit are exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A)(3).
- g. This emissions unit is not considered an "Affected Facility" under 40 CFR Part 60 Subpart Db due to the fact that, on an individual basis, the pieces of fuel burning equipment which make up this emissions unit are each below the minimum affected heat input capacity of 10 mmBTU/hour.



c) Operational Restrictions

- (1) The permittee shall only burn natural gas in the equipment that makes up this emissions unit.
- (2) The maximum annual fuel usage for emissions units B100 and B101 combined shall not exceed 522.10 million cubic feet (mmcf) of natural gas, based upon a rolling 12-month summation of the monthly fuel usage rates. This is an existing facility and, as such, natural gas usage records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

d) Monitoring and/or Recordkeeping 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 permittee shall maintain monthly records of the following information for emissions units B100 and B101, combined:
  - a. the quantity of natural gas combusted, in mmcf;
  - b. the CO and NO<sub>x</sub> emission rates\*, in tons;
  - c. the rolling 12-month natural gas usage rate, in mmcf; and
  - d. the rolling 12-month CO and NO<sub>x</sub> emission rates\*, in tons.

\*Calculated using AP-42 Section 1.4, Natural Gas Combustion [7/98]

e) Reporting Requirements

- (1) 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. the rolling, 12-month natural gas usage rate, specified in section c)(2)
    - ii. the rolling, 12-month CO emission limitation specified in section b)(1); and
    - iii. the rolling, 12-month NO<sub>x</sub> emission limitation specified in section b)(1).
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and



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

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31, April 30, July 31, and October 31, and shall cover the previous calendar quarter.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitations  
26.10 tons of NO<sub>x</sub> per rolling, 12-month period  
21.93 tons of CO per rolling, 12-month period  
  
Applicable Compliance Method  
Compliance with the emission rolling 12-month emission limitations shall be demonstrated through the recordkeeping requirements in section d)(2).
  - b. Emission Limitation  
0.020 lb PE/MMBtu of actual heat input  
  
Applicable Compliance Method  
Compliance with the emission limitation shall be determined by multiplying the emission factor of 1.90 lb of PE/mmcf (AP-42, Table 1.4-2 [07/98]) by the



maximum fuel flow rate of each respective unit, and then dividing by the maximum heat input rate of each respective unit.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation in accordance with procedures specified in OAC rule 3745-17-03(B).

c. Emission Limitation

Visible emissions shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.



**3. B101, Miscellaneous Natural Gas-Fired Equipment (Distribution Center)**

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

Miscellaneous Natural Gas-Fired Equipment located at the Distribution Center

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)a., b)(2)b., c)(2), d)(2), e)(1), f)(1)a., and f)(1)b.
- 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)	26.10 tons of nitrogen oxides (NOx) per rolling 12-month period for emission units B100 and B101 combined (See b)(2)b.)  21.93 tons of carbon monoxide (CO) per rolling, 12-month period for emission units B100 and B101 combined (See b)(2)b.)
b.	OAC rule 3745-17-10(B)(1)	0.020 lb particulate emissions (PE)/mmBtuof actual heat input (See b)(2)c.)
c.	OAC rule 3745-17-11(B)	See b)(2)d.
d.	OAC rule 3745-17-07(A)(1)	Visible emissions shall not exceed 20% opacity as a six-minute average, except as specified by rule (See b)(2)e.)
e.	OAC rule 3745-18-06(A)	See b)(2)f.
f.	40 CFR Part 60 Subpart Db	See b)(2)g.



(2) Additional Terms and Conditions

- a. This emissions unit is comprised of all the current miscellaneous natural gas-fired heaters located at the Procter & Gamble "Distribution Center" located at 637 N. Cool Road, Lima Ohio. This equipment consists of combustors #3-12, 14-18, 20-22, 24-36, 38-42, 45-49, the heaters for the phoenix project, construction services, storeroom, break room, and central lab, and four heaters for Spine logistics areas with a total maximum heat input of 31.87 mmBTU/hour.
- b. This permit establishes the following federally enforceable emission limitations based on a fuel usage restriction in c)(2) for purposes of limiting potential to emit:
  - i. 26.1 tons of NOx per rolling, 12-month period; and
  - ii. 21.93 tons of CO per rolling, 12-month period.

The permittee has requested these federally enforceable limitations for the purpose of avoiding Title V applicability.

- c. The individual pieces of equipment which make up this emissions unit where fuel is burned for the primary purpose of producing heat or power by indirect heat transfer, and have a heat input capacity 1.00 mmBtu/hr or greater are subject to this emission limitation established under OAC rule 3745-17-10(B)(1).
- d. The individual pieces of fuel burning equipment associated with this emissions unit that are potentially affected by OAC rule 3745-17-11 (those pieces where fuel is burned for the primary purpose of producing heat or power by direct heat transfer) are deemed exempt from the requirements of OAC rule 3745-17-11 because the process weight rate equals zero.
- e. The individual pieces of equipment which comprise this emissions unit that are subject to the requirements established under OAC rule 3745-17-10 are subject to the visible particulate emissions (PE) limitation specified above.

The remaining individual pieces of equipment which make up this emissions unit are exempt from the visible PE limitation specified in OAC rule 3745-17-07(A), pursuant to OAC rule 3745-17-07(A)(3)(h), because OAC rule 3745-17-10 and OAC rule 3745-17-11 are not applicable.

- f. The individual pieces of equipment which make up this emissions unit are exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A)(3).
- g. This emissions unit is not considered an "Affected Facility" under 40 CFR Part 60 Subpart Db due to the fact that, on an individual basis, the pieces of fuel burning equipment which make up this emissions unit are each below the minimum affected heat input capacity of 10 mmBTU/hour.



c) Operational Restrictions

- (1) The permittee shall only burn natural gas in the equipment that makes up this emissions unit.
- (2) The maximum annual fuel usage for emissions units B100 and B101 combined shall not exceed 522.10 million cubic feet (mmcf) of natural gas, based upon a rolling 12-month summation of the monthly fuel usage rates. This is an existing facility and, as such, natural gas usage records exist. The applicant shall use the existing records to determine compliance upon startup under this permit. Therefore, it is not necessary to establish federally enforceable restrictions for the first 12 months of operation under the provisions of this permit.

d) Monitoring and/or Recordkeeping 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 permittee shall maintain monthly records of the following information for emissions units B100 and B101, combined:
  - a. the quantity of natural gas combusted, in mmcf;
  - b. the CO and NO<sub>x</sub> emission rates\*, in tons;
  - c. the rolling 12-month natural gas usage rate, in mmcf; and
  - d. the rolling 12-month CO and NO<sub>x</sub> emission rates\*, in tons.

\*Calculated using AP-42 Section 1.4, Natural Gas Combustion [7/98]

e) Reporting Requirements

- (1) 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. the rolling, 12-month natural gas usage rate, specified in section c)(2)
    - ii. the rolling, 12-month CO emission limitation specified in section b)(1); and
    - iii. the rolling, 12-month NO<sub>x</sub> emission limitation specified in section b)(1).
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and



- d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31, April 30, July 31, and October 31, and shall cover the previous calendar quarter.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitations  
26.10 tons of NO<sub>x</sub> per rolling, 12-month period  
21.93 tons of CO per rolling, 12-month period
- Applicable Compliance Method  
Compliance with the emission rolling 12-month emission limitations shall be demonstrated through the recordkeeping requirements in section d)(2).
- b. Emission Limitation  
0.020 lb PE/MMBtu of actual heat input
- Applicable Compliance Method  
Compliance with the emission limitation shall be determined by multiplying the emission factor of 1.90 lb of PE/mmcf (AP-42, Table 1.4-2 [07/98]) by the



maximum fuel flow rate of each respective unit, and then dividing by the maximum heat input rate of each respective unit.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation in accordance with procedures specified in OAC rule 3745-17-03(B).

c. Emission Limitation

Visible emissions shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.



**4. Emissions Unit Group - 25.7 mmBtu/hour boilers: B018 and B019**

EU ID	Operations, Property and/or Equipment Description
B018	25.7 mmBtu/hr Natural Gas-Fired Boiler (Boiler 1A)
B019	25.7 mmBtu/hr Natural Gas-Fired Boiler (Boiler 2A)

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - a. None
  - (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - a. b)(1)b., b)(2)b., c)(1), d)(1), e)(1), and f)(1)d.
- 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)	<u>For each emissions unit:</u> 3.34 lbs of nitrogen oxides (NOx)/hour 2.57 lbs of carbon monoxide (CO)/hour 0.18 lb of particulate emissions (PE)/hour  Visible PE shall not exceed 10% opacity as a six-minute average  See b)(2)a.
b.	OAC rule 3745-31-05(D)	<u>For B018, B019, and B021 combined:</u> 17.30 tons of NOx/rolling 12-month period 13.30 tons of CO/rolling 12-month period 0.90 ton of PE/rolling 12-month period  See b)(2)b.
c.	OAC rule 3745-17-10(B)(1)	See b)(2)c.
d.	OAC rule 3745-17-07(A)	See b)(2)c.
e.	OAC rule 3745-18-06	See b)(2)d.
f.	40 CFR Part 60, Subpart Dc	See d)(1)a.



(2) Additional Terms and Conditions

- a. The “Best Available Technology” (BAT) requirement for this emissions unit has been determined to be compliance with the terms and conditions of this permit. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with 40 CFR Part 60, Subpart Dc.
- b. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Title V permitting requirements. The federally enforceable emission limitations are based on the operational restriction in c)(1):
  - i. 17.30 tons of NOx/rolling 12-month period;
  - ii. 13.30 tons of CO/rolling 12-month period; and
  - iii. 0.90 ton of PE/rolling 12-month period.
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. This emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A)(3).

c) Operational Restrictions

- (1) The maximum annual natural gas usage for emissions units B018, B019, and B021 combined shall not exceed 266.30 million cubic feet (mmcf) per year, based upon a rolling 12-month summation of the monthly fuel usage rates.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the fuel usage levels specified in the following table:

Month	Maximum Allowable Cumulative Fuel Usage (mmcf)
1	25.00
1-2	50.00
1-3	75.00
1-4	100.00
1-5	125.00
1-6	150.00
1-7	170.00
1-8	190.00
1-9	210.00
1-10	230.00
1-11	250.00
1-12	266.30



After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual fuel usage limitation shall be based upon a rolling 12-month summation of the monthly fuel usage. [It should be noted that the first six months of operation has already occurred under PTIO #P0112748 issued on 06/03/2013.]

(2) The permittee shall burn only pipeline quality natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

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

- a. The natural gas usage for each month, in mmcf;
- b. For the first 12 months of operation following the issuance of this permit, the cumulative natural gas usage, in mmcf;
- c. After the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month summation of the natural gas usage, in mmcf;
- d. The calculated emissions of NO<sub>x</sub>, CO, and PE, in tons; and
- e. The rolling 12-month emissions of NO<sub>x</sub>, CO, and PE, in tons.

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

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. All deviations of the following emission limitations, operational restrictions, and/or control device operating parameter limitations that restrict the PTE of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:
  - i. For the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative fuel usage levels;
  - ii. After the first 12 calendar months of operation following the issuance of this permit, the rolling 12-month natural gas usage limitation of 266.30 mmcf; and
  - iii. The rolling 12-month NO<sub>x</sub>, CO, and PE emissions.
- b. The probable cause of each deviation;
- c. Any corrective actions that were taken to remedy the deviations or prevent future deviations; and



- d. The magnitude and duration of each deviation.

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

These quarterly reports shall be submitted electronically through Ohio EPA Air Services by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarter.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (3) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation  
3.34 lbs of NOx/hour

Applicable Compliance Method

Compliance with the hourly emission limitation shall be determined by multiplying the vendor-supplied emission factor of 0.13 lb of NOx/mmBtu by the maximum heat input of 25.7 mmBtu/hour. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 7 of 40 CFR Part 60, Appendix A.



- b. Emission Limitation  
2.57 lbs of CO/hour

Applicable Compliance Method

Compliance with the hourly emission limitation shall be determined by multiplying the vendor-supplied emission factor of 0.10 lb of CO/mmBtu by the maximum heat input of 25.7 mmBtu/hour. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

- c. Emission Limitation  
0.18 lb of PE/hour

Applicable Compliance Method

Compliance with the hourly emission limitation shall be determined by multiplying the vendor-supplied emission factor of 0.007 lb of PE/mmBtu by the maximum heat input of 2.57 mmBtu/hour. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

- d. Emission Limitations  
17.30 tons of NOx/rolling 12-month period  
13.30 tons of CO/rolling 12-month period  
0.90 ton of PE/rolling 12-month period

Applicable Compliance Method

Compliance with the rolling 12-month limitations shall be demonstrated through the recordkeeping requirements in section d)(1).

- e. Emission Limitation  
Visible PE shall not exceed 10% opacity as a six-minute average

Applicable Compliance Method

If required, compliance shall be demonstrated using Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources") and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.

- g) Miscellaneous Requirements

- (1) None.