



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

TELE: (614) 644-3020 FAX: (614) 644-2329

11/05/03

CERTIFIED MAIL

RE: Final Chapter 3745-35 Permit To Operate

B007 (Boiler (Erie City)) Wood or Coal Fired Boiler Unit with Emissions controlled by the use of a multi-clone and a baghouse. This unit is currently in operation and B006 is not physically operable at this time. The units cannot be run simultaneously.

Holmes By-Products (02-38-00-0004)
Dennis Koshmider
3175 Township Road 411
Millersburg, OH 44654

Dear Dennis Koshmider:

The enclosed Permit(s) to Operate allow you to operate the described emissions unit(s) in the manner indicated in the Permit(s). Because each permit contains several terms and conditions, I urge you to read them carefully. 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.

You are hereby notified that this action of the Director is final 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. It must be filed with the Environmental Review Appeals Commission within thirty (30) days after notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. It is also requested by the Director that a copy of the appeal be served upon the Environmental Enforcement Section of the Office of the Attorney General. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, Ohio 43215

If you have any questions, please contact Northeast District Office.

Sincerely,

Michael W. Ahern
Permit Issuance and Data Management Section
Division of Air Pollution Control

cc: Northeast District Office



State of Ohio Environmental Protection Agency

Final Permit To Operate An Emissions Unit

Effective Date: 11/05/03

Expiration Date: 11/05/08

This document constitutes issuance to:

Facility ID: 02-38-00-0004
Holmes By-Products
3175 Township Road 411
Millersburg, OH 44654

of a permit to operate for:

B007 (Boiler (Erie City))

Wood or Coal Fired Boiler Unit with Emissions controlled by the use of a multi-clone and a baghouse. This unit is currently in operation and B006 is not physically operable at this time. The units cannot be run simultaneously.

You will be contacted six months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency identified below. This permit and the authorization to operate the air contaminant source (emissions unit) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC Chapter 3745-35 and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the Ohio EPA District Office or local air agency that is responsible for processing and administering your permit:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

This permit is granted subject to the conditions attached hereto.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

Facility Name: Holmes By-Products
Facility ID: 02-38-00-0004
Emissions Unit: B007 (Boiler (Erie City)) Wood or Coal Fired Boiler Unit with Emissions controlled by the use of a multi-clone and a baghouse. This unit is currently in operation and B006 is not physically operable at this time. The units cannot be run simultaneously.

Part I: General Terms and Conditions

1. Compliance Requirements

The above-described emissions unit is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.

2. Permit to Install Requirement

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

3. 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 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 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.)

4. Records Retention Requirements

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 the permit. Such records may be maintained in computerized form.

5. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State and federal air pollution laws and regulations and the terms and conditions of this permit. The permittee shall

furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

6. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of this emissions unit(s) that is (are) served by such control system(s).

7 Permit Transfers

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

8. 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.

9. Permit Renewal

Approximately six months prior to the expiration date of this permit, a notice regarding the renewal of this permit will be sent to the permittee's designated facility contact. If you are not contacted, please contact the following Ohio EPA District Office or local air agency which has jurisdiction in the area in which the facility is located:

Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330) 425-9171

It is the permittee's responsibility to renew this permit even if no notice of its expiration is received

Part II: Special Terms and Conditions

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>
Erie City, 30 MMBtu/hr, wood- or coal-fired boiler controlled by a multiclone and baghouse	OAC rule 3745-31-05(A)(3) PTI 02-01817 as modified on May 6, 1992	See A.2.a and A.2.b below. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A).
	OAC rule 3745-17-07(A)	See A.2.c below.
	OAC rule 3745-17-10	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-35-07(B) OAC rule 3745-18-44(A)	See A.2.d below. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a Particulate emissions shall not exceed 0.20 lb/MMBtu
- 2.b Sulfur dioxide emissions shall not exceed 1.6 pounds per MMBtu of actual heat input.

Visible particulate emissions shall not exceed 20% opacity as a six-minute average, except as provided for by the rule.

Sulfur dioxide emissions shall not exceed 99.5 tons per rolling, 12-month period.

B. Operational Restrictions

1. The pressure drop across the baghouse shall be maintained within the manufacturer's recommended range of 0.5 to 4 inches of water while the emissions unit is in operation.
2. The boiler emissions shall be controlled by the multiclone and baghouse at all times the boiler is in operation.
3. Only one boiler, either emissions unit B006 or emissions unit B007, shall be operated at any time
4. The maximum annual operating hours for this emissions unit for the burning of coal shall not exceed 4050 hours per rolling, 12-month period.

B Operational Restrictions (continued)

5. The quality of the coal burned in this emissions unit shall meet the following specifications on an as received wet basis:
 - a. less than 7.0 percent ash by weight;
 - b. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.6 pounds sulfur dioxide/mmBtu actual heat input; and
 - c. greater than 12,600 Btu/pound of coal

Compliance with the above-mentioned specifications shall be determined by using the analytical results provided by the permittee or coal supplier for each shipment of coal.
6. The maximum heat input to this source shall not exceed 30.0 MMBtu per hour, which is the maximum rated capacity of this boiler.

C Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain equipment to monitor the pressure drop across the baghouse while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the baghouse on a daily basis.
2. The permittee shall maintain a control device operation and maintenance log that includes the following information:
 - a. all times the control devices are not operating while the emissions unit is in operation; and
 - b. the date and results of all maintenance checks for the control devices.
3. The permittee shall maintain a daily boiler operations log that clearly documents the date, beginning time and ending time for each of the following:
 - a. the start-up of the boiler
 - b. the shutdown of the boiler;
 - c. each malfunction of the boiler and/or its associated control equipment
 - d. the intermittent soot-blowing operations (the cleaning of heat transfer surfaces with pressurized air or steam);
 - e. the intermittent ash removal operations (dumping or pulling of ash); and
 - f. the commencement of increased fuel firing from a banked condition.
4. The permittee shall maintain daily records that document the operating hours for this emissions unit while burning coal and while burning wood waste.
5. The permittee shall maintain monthly records of the rolling, 12-month summation of the operating hours for this emissions unit while burning coal.

C Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall collect or require the coal supplier to collect a representative grab sample of each shipment of coal that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the coal sampling in accordance with ASTM method D2234, Collection of a Gross Sample of Coal and analyze the coal sample for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content, and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the Ohio EPA Northeast District Office.
7. For each shipment of coal received for burning in this emissions unit, the permittee shall maintain records of the total quantity of coal received, the permittee's or coal supplier's analyses for ash content, sulfur content, and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu).

D. Reporting Requirements

1. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the baghouse did not comply with the allowable range specified above.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month operating hours limitation for the burning of coal.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the boiler was not controlled by the multiclone and baghouse while the emissions unit was in operation.
4. The permittee shall submit, on a quarterly basis, copies of the permittee's or coal supplier's analyses (wet basis) for each shipment of coal that is received for burning in this emissions unit. The permittee or coal supplier's analyses shall document the ash content (percent), sulfur content (percent), and heat content (Btu/pound) of each shipment of coal. The following information shall also be included with the copies of the permittee's or coal supplier's analyses:
 - a. the total quantity of coal received in each shipment (tons); and
 - b. the calculated sulfur dioxide emission rate (pounds sulfur dioxide/mmBtu actual heat input) for each shipment.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the coal shipments received during the previous calendar quarters.

5. All deviation (excursion) reports shall be submitted in accordance with Section A.1.c of the General Terms and Condition of this permit.
6. The permittee shall submit annual reports that include the following information:
 - a. the total calculated sulfur dioxide emissions from the past calendar year; and
 - b. the total operating hours of the boiler when burning coal

Each report shall be submitted by February 15 of each year.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
0.20 lb/MMBtu of particulate emissions

Applicable Compliance Methods:

If required, compliance shall be determined in accordance with OAC rule 3745-17-03(B)(10) (Method 5, 40 CFR 60, Appendix A).

E. Testing Requirements (continued)

- 1.b** Emission Limitation:
1.6 lbs/MMBtu of SO₂ emissions

Applicable Compliance Method:

Compliance when burning coal shall be based upon the fuel quality records required pursuant to section C and the following formula specified in OAC 3745-18-04(F)(1):

$$ER = (1 \times 10^6 / H) \times S \times 1.9$$

where:

ER= the emission rate in pounds of sulfur dioxide per MM Btu;

H= the heat content of the solid fuel in Btu per pound; and

S= the decimal fraction of sulfur in the solid fuel.

Compliance when burning wood waste may be based on the 0.025 lb/MMBtu emission factor from AP-42, table 1.6-2 (3/02).

If required, compliance shall be determined in accordance with USEPA Methods through 4, and 6 of 40 CFR 60, Appendix A.

- 1.c** Emission Limitation:
99.5 tons of SO₂ emissions per rolling, 12-month period

Applicable Compliance Method:

Compliance shall be assumed if the permittee maintains compliance with the allowable SO₂ emission rate and the allowable total operating hours when burning coal, as shown by the following equation:

$$E = (1.6 \text{ lbs/MMBtu} \times 30 \text{ MMBtu/hr} \times 4050 \text{ hrs/yr}) / (2000 \text{ lbs/ton}) + (0.025 \text{ lb/MMBtu} \times 30 \text{ MMBtu/hr} \times (8760 - 4050 \text{ hrs/yr})) / (2000 \text{ lbs/ton}) = 99.0 \text{ tons of SO}_2$$

where:

E= the emissions of sulfur dioxide, in tons per rolling, 12-month period;

1.6 lbs/MMBtu is the allowable sulfur dioxide emission rate;

30 MMBtu/hr is the maximum actual heat input for the boiler;

4050 hrs/yr is the maximum allowable operating hours per year when burning coal; and

0.025 lb/MMBtu is the SO₂ emission factor for wood waste combustion from AP-42 table 1.6-2.

To estimate the actual SO₂ emissions from this emissions unit for a 12-month period, the permittee may use the above equation and the actual hours of operation while burning coal and while burning wood waste during that period.

- 1.d** Emission Limitation:
Visible emissions shall not exceed 20% opacity except as provided by rule.

Applicable Compliance Methods:

Compliance shall be determined according to USEPA Method 9, 40 CFR 60, Appendix A.

F. Miscellaneous Requirements

1. In accordance with the provisions of OAC rule 3745-35-07, the following terms and conditions of this permit to operate are federally enforceable: A - F.