



State of Ohio Environmental Protection Agency

STREET ADDRESS:

1800 WaterMark Drive  
Columbus, OH 43215-1099

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

MAILING ADDRESS:

P.O. Box 1049  
Columbus, OH 43216-1049

CERTIFIED MAIL

November 6, 1996

RE: Permit to Operate Application No. 0238000119B001, B003 B007  
Holmes County

Miller Lumber Company  
Suzanne M. Miller  
7101 St. Rt. 39  
Millersburg, Ohio 44645

Enclosed are Permit(s) to Operate which allow you to operate the described air contaminant source(s) in the manner indicated in the permit(s). Because these permits contain several conditions and restrictions, 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 Board of Review 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 Board of Review 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 board. An appeal may be filed with the Environmental Board of Review at the following address:

Environmental Board of Review  
236 East Town Street  
Room 300  
Columbus, Ohio 43215

If you have any questions, please contact the air pollution control agency to which you submitted your application.

Very truly yours,

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

cc: USEPA  
NEDO/DAPC

George V. Voinovich, Governor  
Nancy P. Hollister, Lt. Governor  
Donald R. Schregardus, Director



State of Ohio Environmental Protection Agency

# PERMIT TO OPERATE AN AIR CONTAMINANT SOURCE

Date of Issuance November 6, 1996

Application No. 0238000119B001

Effective Date November 6, 1996

Permit Fee \$000

This document constitutes issuance to: **MILLER LUMBER COMPANY**  
**7101 STATE ROUTE 39**  
**MILLERSBURG, OHIO 44654**

of a permit to operate for:  
**INTERNATIONAL, COAL-FIRED, UNDERFEED STOKER 4.3 MMBTU/HR)**  
**100 HP COAL BOILER**

The following terms and conditions are hereby expressly incorporated into this permit to operate:

1. This permit to operate shall be effective until 11/06/99  
You will be contacted approximately six months prior to this date regarding the renewal of this permit. If you are not contacted, please write to the appropriate Ohio EPA field office.
2. The above-described source is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.
3. Prior to any modification of this source, as defined in rule 3745-31-01 of the Ohio Administrative Code (OAC), a permit to install must be granted by the Ohio EPA pursuant to OAC Chapter 3745-31.
4. The Director of the Ohio EPA or an authorized representative may, subject to the safety requirements of the permit holder, enter upon the premises of this source at any 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.
5. A permit fee in the amount specified above must be remitted within 15 days from the issuance date of this permit.
6. Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA field office must be notified in writing of any transfer of this permit.
7. This source and any associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices in order to minimize air contaminant emissions. Any malfunction of this source or any associated air pollution control system(s) shall be reported immediately to the appropriate Ohio EPA field office in accordance with 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 source.
8. Any unauthorized or emergency release of an air contaminant from this source which, due to the toxic or hazardous nature of the material, may pose a threat to public health, or otherwise endanger the safety or welfare of the public, shall be reported immediately to the appropriate Ohio EPA field office (during normal business hours) or to the Ohio EPA's Emergency Response Group (1-800-282-9378). (Additional reporting may be required pursuant to the federal Comprehensive Environmental Response, Compensation, and Liability Act.)
9. The appropriate Ohio EPA field office is: **NORTHEAST DISTRICT OFFICE/DAPC**  
**2110 EAST AURORA ROAD**  
**TWINSBURG, OHIO 44807 (216) 425-9171**
10.  If this term and condition is checked, the permit holder is subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Director

## **SYNTHETIC MINOR DETERMINATION**

### **A) SOURCE DESCRIPTION:**

Miller Lumber Company has requested a modification in the Permit to Operate (PTO) for the 4.3 mmBtu/hour coal fired stoker boiler at its facility at 7101 State Route 39, Millersburg, Ohio. The modification would result in a federally enforceable State operating permit sulfur dioxide emissions limit for this source (B001) of 65.73 tons/year. SO<sub>2</sub> emissions for the facility would be limited to 99.62 TPY due to four additional fossil fuel fired boilers also permitted at this facility.

### **B) FACILITY EMISSIONS AND AREA ATTAINMENT STATUS:**

Millersburg is in the central portion of Holmes County which is designated attainment for SO<sub>2</sub>. Current actual annual SO<sub>2</sub> emissions for this emissions unit are estimated to be 41.75 tons. Actual annual SO<sub>2</sub> emissions from this facility (including potential to emit of 27.37 tons SO<sub>2</sub> from a second coal fired stoker, a gas fired boiler, a gas/oil fired boiler, and a waste wood fired stoker/boiler) are estimated to be 69.12 tons.

### **C) MODIFIED SOURCE EMISSIONS LIMITATIONS:**

Through the "Additional Federally Enforceable Emissions Requirements for Sulfur Dioxide" section of this FESOP, this facility will be limited to annual SO<sub>2</sub> emissions of 99.62 TPY. This specific emissions unit (Source B001) will be restricted to annual SO<sub>2</sub> emissions of 65.73 tons. This will be achieved by limiting the sulfur content of the coal purchased and burned in this 4.3 mmBtu/hour boiler to 3.49 pounds of SO<sub>2</sub> per million Btu heat input on a "dry" basis over the entire year (8760 hours). This value shall be determined by a weighted monthly average of supplier analyses of coal shipments during each month.

This facility will be required to record monthly coal quality data and report this information on a semi-annual basis to NEDO.

### **D) CONCLUSIONS:**

NEDO believes that the coal quality restrictions placed on this relatively small source will effectively limit this facility to "synthetic minor" status with regards to SO<sub>2</sub> emissions. The facility is a minor source for other air pollutants.

*The following terms and conditions will be included in each non-Title V permit under the General Conditions section.*

### **Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State 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:

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 three 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 appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

- 10.** The permittee also is subject to the attached special terms and conditions.

APPLICATION NUMBER: 02-38-00-0119 B001  
FACILITY NAME: MILLER LUMBER COMPANY  
EQUIPMENT DESCRIPTION: INTERNATIONAL, COAL-FIRED,  
UNDERFEED STOKER (4.3 MMBTU/HR.)  
COMPANY ID: 100 HP COAL BOILER

### **SPECIAL TERMS AND CONDITIONS**

**A) APPLICABLE STATE REGULATIONS:**

The following rules of the Ohio Administrative Code (OAC) establish the applicable emission limitations and/or control requirements of this source:

OAC Rule 3745-17-07(A)  
OAC Rule 3745-17-10(C)  
OAC Rule 3745-18-04

(This condition in no way limits the applicability of other requirements of the Ohio Administrative Code to this source.)

**B) ALLOWABLE EMISSIONS LIMITS:**

Per OAC Rule 3745-17-10(C)(2), Figure I, the particulate emissions from this emission unit shall not exceed 0.60 pound per million Btu (mmBtu) of heat input. Annual particulate emissions shall not exceed 11.30 tons per year.

2. Sulfur dioxide (SO<sub>2</sub>) emissions from this facility shall not exceed 99.62 tons per year. SO<sub>2</sub> emissions from this single coal-fired emissions unit (B001) shall not exceed 3.49 pounds per million Btu of heat input or 65.73 tons per year. (See "Federally Enforceable Emission Requirements for Sulfur Dioxide" below.)

**C) GENERAL SOURCE OPERATING RESTRICTIONS:**

- 1 The maximum heat input to this source shall not exceed 4.3 mmBtu per hour, the maximum rated capacity of this boiler.
- 2 The steam injection system shall be used at all times during operation of this source.

3. The use of flyash reinjection in this source is prohibited.
4. This source shall employ an overfire air system which is designed, maintained, and operated in accordance with good engineering practices and which minimizes visible emissions.

**D) VISIBLE PARTICULATE EMISSION RESTRICTIONS:**

This emissions unit shall comply with OAC Rule 3745-17-07(A), which limits visible particulate emissions as follows:

1. Except as provided below, visible particulate emissions from the stack shall not exceed an opacity of twenty (20) percent as a six-minute average.
2. Visible particulate emissions from the stack may exceed twenty (20) percent as a six-minute average for not more than six (6) consecutive minutes in any sixty-minute period, but shall not exceed sixty (60) percent opacity at any time.

The visible particulate emission limitations specified above shall not apply to the following operations, provided the operations are documented in a boiler operations log kept at the facility:

- a) The start-up of the source for a period of time required to achieve stable combustion conditions, but no more than three (3) hours from the moment of start-up. "Start-up" means the commencement of firing of fuel from a cold non-fired condition.
- b) The shutdown of the source for a period of not more than three (3) hours.
- c) The malfunction of the source or associated equipment, if the owner of the source or operator of the equipment complies with the requirements of OAC Rule 3745-15-06.
- d) Intermittent soot-blowing operations (the cleaning of heat transfer surfaces with pressurized air or steam).
- e) Intermittent ash removal operations (the dumping or pulling of ash).
- f) The commencement of increased coal firing from a banked condition for a period not to exceed thirty (30) minutes. "Banked condition" means the condition where the fuel is burned on the grates at rates which are sufficient to maintain ignition only.

This boiler operations log shall clearly document the date, beginning time, and ending time of the exempted operations listed above.

E) **FEDERALLY ENFORCEABLE EMISSION REQUIREMENTS FOR SULFUR DIOXIDE:**

The total annual emissions of SO<sub>2</sub> from all sources at this facility shall be limited to 99.62 tons. Since four (4) other emissions units at this facility (a second coal-fired boiler, source B003, a gas fired boiler, source B004, a gas/No. 2 oil fired boiler, source B007, and a waste wood fired boiler, source B008, with maximum heat input rates of 1.6, 1.68, 8.5, and 8.92 million Btu/hour respectively) collectively have maximum annual potential SO<sub>2</sub> emissions of 33.89 tons per year, the annual allowable emissions from this coal fired boiler (B001) shall not exceed 65.73 tons. This annual sulfur dioxide emissions limitation on source B001 shall be achieved by restricting the sulfur content in the coal supply of this emissions unit during the entire year (8760 hours) in the following manner.

The quality of coal burned in this stoker/boiler shall meet the following specifications on a dry basis:

- 1) a sulfur content which is sufficient to comply with an allowable sulfur dioxide emission limitation of 3.49 pounds of sulfur dioxide per million Btu actual heat input;
- 2) less than 8.0 percent ash; and
- 3) greater than 13,000 Btu per pound coal.

Compliance with the above-mentioned specifications for sulfur, ash, and heat content shall be determined by using the analytical results provided by the coal supplier for each shipment of coal. The analytical methods for sulfur content, ash content, and heat content in coal shall be: 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; ASTM Method D3174, Ash in the Analysis Sample of Coal and Coke; 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 Calorimeter, respectively.

The owner/operator of this source shall notify the Ohio EPA immediately if the fuel quality restrictions above are exceeded.

**F) RECORDKEEPING REQUIREMENTS**

This facility shall maintain records of the results of the coal supplier's analyses of each coal shipment received for burning in this source on both an "as received" and "dry basis". Data recorded shall include;

- a) the total quantity of coal received in each shipment (tons),
- b) the sulfur content (percent) of the coal received in each shipment,
- c) the ash content (percent) of the coal received in each shipment,
- d) the heat content (Btu per pound) of coal received in each shipment,
- e) the sulfur dioxide emission rate (pounds SO<sub>2</sub> per million Btu actual heat input) from coal received in each shipment.
- f) Monthly calculations of the weighted average SO<sub>2</sub> emission rate, ash content, and heat content for the coal received each calendar month.

Compliance with the applicable SO<sub>2</sub> emission limit, as well as the ash and Btu limitations, shall be determined based on the weighted arithmetic average of all fuel analyses for each calendar month.

*[NOTE: A weighted average fuel quality value is determined by multiplying each fuel analysis value (Btu/pound, percent ash, or SO<sub>2</sub> emission rate) by the weight of the shipment of fuel for which the quality value is representative, adding up all the value-weighted products, and dividing the sum of the value-weighted products by the sum of all the shipment weights.]*

These records, as well as any other supporting analyses, computations, operations logs, and fuel receipts, shall be retained on site in facility files for a period of not less than five (5) years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

**G. REPORTING REQUIREMENTS**

- 1) The owner/operator of this source shall notify the Ohio EPA immediately if any of the restrictions in the "Federally Enforceable Requirements for Sulfur Dioxide" are exceeded.
- 2) This facility shall submit semi-annual reports to the Ohio EPA, Northeast District Office, which provide the following information for this source:

- a) The total quantity of coal received during each calendar month;
- b) The weighted average ash content (percent) of the coal received during each calendar month;
- c) The weighted average heat content (Btu per pound) of the coal received during each calendar month;
- d) The weighted average SO<sub>2</sub> emission rate (pounds SO<sub>2</sub> per mmBtu actual heat input) for the coal received during each calendar month;
- e) The level of SO<sub>2</sub> emissions (in Tons) for each month as calculated from the monthly amount of coal burned (received) and the weighted average heat content and weighted average SO<sub>2</sub> emissions rate for the coal received.
- f) A copy of the coal supplier's analyses for each coal shipment received during the reporting period.

All fuel analyses data shall be reported on both an as received and a dry basis.

These reports shall be submitted by February 15 and August 15 of each year and shall cover operations for the previous six calendar months (July through December and January through June).

All reports required by these terms and conditions shall be sent to

Ohio Environmental Protection Agency  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087  
Phone: (216) 963-1200

**H) FEDERAL ENFORCEABILITY:**

Sections B(2), E, F, and G of these Special Terms and Conditions constitute the federally enforceable portions of this Permit to Operate.



State of Ohio Environmental Protection Agency

# PERMIT TO OPERATE AN AIR CONTAMINANT SOURCE

Date of Issuance **November 6, 1996** Application No. **0238000119B003**

Effective Date **November 6, 1996** Permit Fee **\$000**

This document constitutes issuance to: **MILLER LUMBER COMPANY**  
**7101 STATE ROUTE 39**  
**MILLERSBURG, OHIO 44654**

of a permit to operate for:

**KEWANEE, COAL-FIRED, UNDERFEED STOKER (1.6 MMBTU/HR)**  
**29 HP COAL BOILER**

The following terms and conditions are hereby expressly incorporated into this permit to operate:

1. This permit to operate shall be effective until **11/06/99**  
You will be contacted approximately six months prior to this date regarding the renewal of this permit. If you are not contacted, please write to the appropriate Ohio EPA field office.
2. The above-described source is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.
3. Prior to any modification of this source, as defined in rule 3745-31-01 of the Ohio Administrative Code (OAC), a permit to install must be granted by the Ohio EPA pursuant to OAC Chapter 3745-31.
4. The Director of the Ohio EPA or an authorized representative may, subject to the safety requirements of the permit holder, enter upon the premises of this source at any 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.
5. A permit fee in the amount specified above must be remitted within 15 days from the issuance date of this permit.
6. Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA field office must be notified in writing of any transfer of this permit.
7. This source and any associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices in order to minimize air contaminant emissions. Any malfunction of this source or any associated air pollution control system(s) shall be reported immediately to the appropriate Ohio EPA field office in accordance with 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 source.
8. Any unauthorized or emergency release of an air contaminant from this source which, due to the toxic or hazardous nature of the material, may pose a threat to public health, or otherwise endanger the safety or welfare of the public, shall be reported immediately to the appropriate Ohio EPA field office (during normal business hours) or to the Ohio EPA's Emergency Response Group (1-800-282-9378). (Additional reporting may be required pursuant to the federal Comprehensive Environmental Response, Compensation, and Liability Act.)
9. The appropriate Ohio EPA field office is: **NORTHEAST DISTRICT OFFICE/DAPC**  
**2110 EAST AURORA ROAD**  
**TWINSBURG, OHIO 44807 (216)425-9171**
10.  If this term and condition is checked, the permit holder is subject to the attached special terms and conditions.

OHIO ENVIRONMENTAL PROTECTION AGENCY

Director

APPLICATION NUMBER: 02-38-00-0119 B003  
FACILITY NAME: MILLER LUMBER COMPANY  
EQUIPMENT DESCRIPTION: KEWANEE, COAL-FIRED, UNDERFEED  
STOKER (1.6 MMBTU/HR.)  
COMPANY ID: 29 HP COAL BOILER

### **SPECIAL TERMS AND CONDITIONS**

**A) APPLICABLE STATE REGULATIONS:**

The following rules of the Ohio Administrative Code (OAC) establish the applicable emission limitations and/or control requirements of this source:

OAC Rule 3745-17-07(A)  
OAC Rule 3745-17-10(C)  
OAC Rule 3745-18-04

(This condition in no way limits the applicability of other requirements of the Ohio Administrative Code to this source.)

**B) ALLOWABLE EMISSIONS LIMITS:**

1. Per OAC Rule 3745-17-10(C)(2), Figure I, the particulate emissions from this emission unit shall not exceed 0.60 pound per million Btu (mmBtu) of heat input. Annual particulate emissions shall not exceed 4.20 tons per year.
2. Sulfur dioxide (SO<sub>2</sub>) emissions from this facility shall not exceed 99.62 tons per year. SO<sub>2</sub> emissions from this single coal fired emissions unit (B003) shall not exceed 3.49 pounds per million Btu of heat input or 24.46 tons per year. (See "Federally Enforceable Emission Requirements for Sulfur Dioxide" below.)

**C) GENERAL SOURCE OPERATING RESTRICTIONS:**

The maximum heat input to this source shall not exceed 1.6 mmBtu per hour, the maximum rated capacity of this boiler.

2. The steam injection system shall be used at all times during operation of this source.

3. The use of flyash reinjection in this source is prohibited.
4. This source shall employ an overfire air system which is designed, maintained, and operated in accordance with good engineering practices and which minimizes visible emissions.

**D) VISIBLE PARTICULATE EMISSION RESTRICTIONS:**

This emissions unit shall comply with OAC Rule 3745-17-07(A), which limits visible particulate emissions as follows:

1. Except as provided below, visible particulate emissions from the stack shall not exceed an opacity of twenty (20) percent as a six-minute average.
2. Visible particulate emissions from the stack may exceed twenty (20) percent as a six-minute average for not more than six (6) consecutive minutes in any sixty-minute period, but shall not exceed sixty (60) percent opacity at any time.

The visible particulate emission limitations specified above shall not apply to the following operations, provided the operations are documented in a boiler operations log kept at the facility:

- a) The start-up of the source for a period of time required to achieve stable combustion conditions, but no more than three (3) hours from the moment of start-up. "Start-up" means the commencement of firing of fuel from a cold non-fired condition.
- b) The shutdown of the source for a period of not more than three (3) hours.
- c) The malfunction of the source or associated equipment, if the owner of the source or operator of the equipment complies with the requirements of OAC Rule 3745-15-06.
- d) Intermittent soot-blowing operations (the cleaning of heat transfer surfaces with pressurized air or steam).
- e) Intermittent ash removal operations (the dumping or pulling of ash).
- f) The commencement of increased coal firing from a banked condition for a period not to exceed thirty (30) minutes. "Banked condition" means the condition where the fuel is burned on the grates at rates which are sufficient to maintain ignition only.

This boiler operations log shall clearly document the date, beginning time, and ending time of the exempted operations listed above.

E) **FEDERALLY ENFORCEABLE EMISSION REQUIREMENTS FOR SULFUR DIOXIDE:**

The total annual emissions of SO<sub>2</sub> from all sources at this facility shall be limited to 99.62 tons. Since four (4) other emissions units at this facility (a second coal fired boiler, source B001, a gas fired boiler, source B004, a gas/#2 oil fired boiler, source B007, and a waste wood fired boiler, source B008, with maximum heat input rates of 4.3, 1.68, 8.5, and 8.92 million Btu/hour respectively) collectively have maximum annual potential SO<sub>2</sub> emissions of 75.16 tons per year, the annual allowable emissions from this coal fired boiler (B003) shall not exceed 24.46 tons. This annual sulfur dioxide emissions limitation on source B003 shall be achieved by restricting the sulfur content in the coal supply of this emissions unit during the entire year (8760 hours) in the following manner.

The quality of coal burned in this stoker/boiler shall meet the following specifications on a dry basis:

- 1) a sulfur content which is sufficient to comply with an allowable sulfur dioxide emission limitation of 3.49 pounds of sulfur dioxide per million Btu actual heat input;
- 2) less than 8.0 percent ash; and
- 3) greater than 13,000 Btu per pound coal

Compliance with the above-mentioned specifications for sulfur, ash, and heat content shall be determined by using the analytical results provided by the coal supplier for each shipment of coal. The analytical methods for sulfur content, ash content, and heat content in coal shall be: 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; ASTM Method D3174, Ash in the Analysis Sample of Coal and Coke; 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 Calorimeter, respectively.

The owner/operator of this source shall notify the Ohio EPA immediately if the fuel quality restrictions above are exceeded.

**F) RECORDKEEPING REQUIREMENTS:**

This facility shall maintain records of the results of the coal supplier's analyses of each coal shipment received for burning in this source on both an "as received" and "dry basis". Data recorded shall include;

- a) the total quantity of coal received in each shipment (tons),
- b) the sulfur content (percent) of the coal received in each shipment,
- c) the ash content (percent) of the coal received in each shipment,
- d) the heat content (Btu per pound) of coal received in each shipment,
- e) the sulfur dioxide emission rate (pounds SO<sub>2</sub> per million Btu actual heat input) from coal received in each shipment.
- f) Monthly calculations of the weighted average SO<sub>2</sub> emission rate, ash content, and heat content for the coal received each calendar month.

Compliance with the applicable SO<sub>2</sub> emission limit, as well as the ash and Btu limitations, shall be determined based on the weighted arithmetic average of all fuel analyses for each calendar month.

*[NOTE: A weighted average fuel quality value is determined by multiplying each fuel analysis value (Btu/pound, percent ash, or SO<sub>2</sub> emission rate) by the weight of the shipment of fuel for which the quality value is representative, adding up all the value-weighted products, and dividing the sum of the value-weighted products by the sum of all the shipment weights.]*

These records, as well as any other supporting analyses, computations, operations logs, and fuel receipts, shall be retained on site in facility files for a period of not less than five (5) years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

**G. REPORTING REQUIREMENTS:**

- ) The owner/operator of this source shall notify the Ohio EPA immediately if any of the restrictions in the "Federally Enforceable Requirements for Sulfur Dioxide" are exceeded
- 2) This facility shall submit semi-annual reports to the Ohio EPA, Northeast District Office, which provide the following information for this source:

- a) The total quantity of coal received during each calendar month;
- b) The weighted average ash content (percent) of the coal received during each calendar month;
- c) The weighted average heat content (Btu per pound) of the coal received during each calendar month;
- d) The weighted average SO<sub>2</sub> emission rate (pounds SO<sub>2</sub> per mmBtu actual heat input) for the coal received during each calendar month;
- e) The level of SO<sub>2</sub> emissions (in Tons) for each month as calculated from the monthly amount of coal burned (received) and the weighted average heat content and weighted average SO<sub>2</sub> emissions rate for the coal received.
- f) A copy of the coal supplier's analyses for each coal shipment received during the reporting period.

All fuel analyses data shall be reported on both an as received and a dry basis.

These reports shall be submitted by February 15 and August 15 of each year and shall cover operations for the previous six calendar months (July through December and January through June).

All reports required by these terms and conditions shall be sent to:

Ohio Environmental Protection Agency  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087  
Phone: (216) 963-1200

H) **FEDERAL ENFORCEABILITY:**

Sections B(2), E, F, and G of these Special Terms and Conditions constitute the federally enforceable portions of this Permit to Operate.

## **SYNTHETIC MINOR DETERMINATION**

**A) SOURCE DESCRIPTION:**

Miller Lumber Company has requested a modification in the Permit to Operate (PTO) for the 1.6 mmBtu/hour coal fired stoker boiler at its facility at 7101 State Route 39, Millersburg, Ohio. The modification would result in a federally enforceable State operating permit sulfur dioxide emissions limit for this source (B003) of 24.46 tons/year. SO<sub>2</sub> emissions for the facility would be limited to 99.62 TPY due to four additional fossil fuel fired boilers also permitted at this facility.

**B) FACILITY EMISSIONS AND AREA ATTAINMENT STATUS:**

Millersburg is in the central portion of Holmes County which is designated attainment for SO<sub>2</sub>. Current actual annual SO<sub>2</sub> emissions for this emissions unit are estimated to be 17.57 tons. Actual annual SO<sub>2</sub> emissions from this facility (including potential to emit of 51.55 tons SO<sub>2</sub> from a second coal fired stoker, a gas fired boiler, a gas/oil fired boiler, and a waste wood fired stoker/boiler) are estimated to be 69.12 tons.

**C) MODIFIED SOURCE EMISSIONS LIMITATIONS:**

Through the "Additional Federally Enforceable Emissions Requirements for Sulfur Dioxide" section of this FESOP, this facility will be limited to annual SO<sub>2</sub> emissions of 99.62 TPY. This specific emissions unit (Source B003) will be restricted to annual SO<sub>2</sub> emissions of 24.46 tons. This will be achieved by limiting the sulfur content of the coal purchased and burned in this 1.6 mmBtu/hour boiler to 3.49 pounds of SO<sub>2</sub> per million Btu heat input on a "dry" basis over the entire year (8760 hours). This value shall be determined by a weighted monthly average of supplier analyses of coal shipments during each month.

This facility will be required to record monthly coal quality data and report this information on a semi-annual basis to NEDO.

**D) CONCLUSIONS:**

NEDO believes that the coal quality restrictions placed on this relatively small source will effectively limit this facility to "synthetic minor" status with regards to SO<sub>2</sub> emissions. The facility is a minor source for other air pollutants.

*The following terms and conditions will be included in each non-Title V permit under the General Conditions section.*

**1 Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State 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 three 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 appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

- 10.** The permittee also is subject to the attached special terms and conditions.



State of Ohio Environmental Protection Agency

# PERMIT TO OPERATE AN AIR CONTAMINANT SOURCE

Date of Issuance **November 6, 1996** Application No. **0238000119B007**

Effective Date **November 6, 1996** Permit Fee **\$000**

This document constitutes issuance to: **MILLER LUMBER COMPANY  
7101 STATE ROUTE 39  
MILLERSBURG, OHIO 44654**

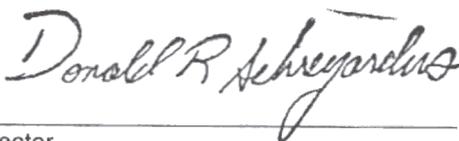
of a permit to operate for:

**KEWANEE, GAS/NO.2 OIL FIRED BOILER (8.5 MMBTU/HR)  
KEWANEE GAS BOILER**

The following terms and conditions are hereby expressly incorporated into this permit to operate:

1. This permit to operate shall be effective until **11/06/99**  
You will be contacted approximately six months prior to this date regarding the renewal of this permit. If you are not contacted, please write to the appropriate Ohio EPA field office.
2. The above-described source is and shall remain in full compliance with all applicable State and federal laws and regulations and the terms and conditions of this permit.
3. Prior to any modification of this source, as defined in rule 3745-31-01 of the Ohio Administrative Code (OAC), a permit to install must be granted by the Ohio EPA pursuant to OAC Chapter 3745-31.
4. The Director of the Ohio EPA or an authorized representative may, subject to the safety requirements of the permit holder, enter upon the premises of this source at any 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.
5. A permit fee in the amount specified above must be remitted within 15 days from the issuance date of this permit.
6. Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA field office must be notified in writing of any transfer of this permit.
7. This source and any associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices in order to minimize air contaminant emissions. Any malfunction of this source or any associated air pollution control system(s) shall be reported immediately to the appropriate Ohio EPA field office in accordance with 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 source.
8. Any unauthorized or emergency release of an air contaminant from this source which, due to the toxic or hazardous nature of the material, may pose a threat to public health, or otherwise endanger the safety or welfare of the public, shall be reported immediately to the appropriate Ohio EPA field office (during normal business hours) or to the Ohio EPA's Emergency Response Group (1-800-282-9378). (Additional reporting may be required pursuant to the federal Comprehensive Environmental Response, Compensation, and Liability Act.)
9. The appropriate Ohio EPA field office is: **NORTHEAST DISTRICT OFFICE/DAPC  
2110 EAST AURORA ROAD  
TWINSBURG, OHIO 44807 (216) 425-9171**
10.  If this term and condition is checked, the permit holder is subject to the attached special terms and conditions

OHIO ENVIRONMENTAL PROTECTION AGENCY



Director

APPLICATION NUMBER 02-38-00-0119 B007  
FACILITY NAME MILLER LUMBER COMPANY  
EQUIPMENT DESCRIPTION KEWANEE, GAS/No.2 OIL FIRED  
BOILER (8.5 MMBTU/HR.)  
COMPANY ID KEWANEE GAS BOILER

**SPECIAL TERMS AND CONDITIONS**

**A) APPLICABLE STATE REGULATIONS**

The following rules of the Ohio Administrative Code (OAC) establish the applicable emission limitations and/or control requirements of this source:

OAC Rule 3745-17-07(A)  
OAC Rule 3745-17-10  
OAC Rule 3745-18-04

(This condition in no way limits the applicability of other requirements of the Ohio Administrative Code to this source.)

**B ALLOWABLE EMISSIONS LIMITS**

Per OAC Rule 3745-17-10(B)(1), the particulate emissions from this emission unit shall not exceed 0.02 pound per million Btu (mmBtu) of heat input. Annual particulate emissions shall not exceed 0.56 tons per year.

2. Sulfur dioxide (SO<sub>2</sub>) emissions from this facility shall not exceed 99.62 tons per year. SO<sub>2</sub> emissions from this gas/oil fired emissions unit (B007) shall not exceed 0.512 pounds per million Btu of heat input or 8.51 tons per year. (See "Federally Enforceable Emission Requirements for Sulfur Dioxide" below.)

**C GENERAL SOURCE OPERATING RESTRICTIONS**

The maximum heat input to this source shall not exceed 8.5 mmBtu per hour, the maximum rated capacity of this boiler.

2. Natural gas shall be used as the primary fuel in this boiler

3. This boiler shall utilize No. 2 fuel oil as a backup fuel only. The date and time that this emissions unit is operated using fuel oil firing shall be clearly documented in the boiler operating log.

**D) VISIBLE PARTICULATE EMISSION RESTRICTIONS:**

This emissions unit shall comply with OAC Rule 3745-17-07(A), which limits visible particulate emissions as follows:

1. Except as provided below, visible particulate emissions from the stack shall not exceed an opacity of twenty (20) percent as a six-minute average.
2. Visible particulate emissions from the stack may exceed twenty (20) percent as a six-minute average for not more than six (6) consecutive minutes in any sixty-minute period, but shall not exceed sixty (60) percent opacity at any time.

The visible particulate emission limitations specified above shall not apply to the following operations, provided the operations are documented in a boiler operations log kept at the facility:

- a) The start-up of the source for a period of time required to achieve stable combustion conditions, but no more than three (3) hours from the moment of start-up. "Start-up" means the commencement of firing of fuel from a cold non-fired condition.
- b) The shutdown of the source for a period of not more than three (3) hours.
- c) The malfunction of the source or associated equipment, if the owner of the source or operator of the equipment complies with the requirements of OAC Rule 3745-15-06.

This boiler operations log shall clearly document the date, beginning time, and ending time of the exempted operations listed above.

**E) FEDERALLY ENFORCEABLE EMISSION REQUIREMENTS FOR SULFUR DIOXIDE:**

The total annual emissions of SO<sub>2</sub> from all sources at this facility shall be limited to 99.62 tons. Since four (4) other emissions units at this facility (two coal fired boilers, Sources B001 and B003, a gas fired boiler, Source B004, and a waste wood fired boiler, Source B008, with maximum heat input rates of 4.3, 1.6, 1.68, and 8.92 million Btu/hour respectively) collectively have maximum annual potential SO<sub>2</sub> emissions of 91.11 tons per year, the annual allowable emissions from this gas/oil fired boiler (B007) shall not exceed 8.51 tons. This annual sulfur dioxide emissions limitation on source B007 shall be achieved by restricting both the quality and volume of fuel oil burned in this emissions

unit as well as the total amount of time that this boiler may operate using fuel oil during any rolling 12 month period in the following manner:

The fuel oil used in this emissions unit shall be restricted to a sulfur dioxide emissions rate of no greater than 0.512 pounds per mmBtu actual heat input. This restriction shall be achieved by limiting the fuel oil to the following specifications:

- a. Sulfur content of no greater than 0.50 percent;
- b. Heat content of no less than 133,000 Btu per gallon; and
- c. Average density of no greater than 6.9 pounds per gallon.

Compliance with the above-mentioned fuel specifications for sulfur, heat content, and density shall be determined by using the analytical results provided by the fuel oil supplier for each shipment of oil. Sampling and analysis of the fuel oil shall be done in accordance with 40 CFR, Part 60, Appendix A, Method 19, or the appropriate ASTM methods, or by an equivalent method approved by the Director of the Ohio EPA.

The owner/operator of this source shall notify the Ohio EPA immediately if the fuel quality restrictions above are exceeded.

2. Fuel oil usage in this boiler shall be limited to no more than 250,000 gallons per year as measured on a rolling 12 month basis.

In order to ensure federal enforceability of this restriction, during the first twelve (12) months of operation under this permit, Miller Lumber Company shall not exceed the total cumulative monthly fuel oil usage limits for each specified time period as shown in table below.

3. The amount of time that this boiler may burn fuel oil each year shall be limited to 3912 hours as measured on a rolling 12 month basis.

To ensure federal enforceability of this operations limitation, during the first twelve (12) months of operation under this permit, Miller Lumber Company shall not exceed the total cumulative hours of operation of this boiler using fuel oil for each specified time period as shown in the table below.

The attached form, entitled "Auxiliary Boiler Operations Log", or an approved equivalent, shall be used to record the daily boiler operating hours during which fuel oil is burned as required to demonstrate compliance with this permit.

Table I

<u>Months</u>	<u>Cumulative Total Hours of Operation</u>	<u>Cumulative Total Gallons of Fuel Oil Burned</u>
1	744	47548
2	1032	65953
3	1320	84358
4	1608	102763
5	1896	121168
6	2184	139573
7	2472	157978
8	2760	176383
9	3048	194788
10	3336	213193
11	3624	231598
12	3912	250000

F) **RECORDKEEPING REQUIREMENTS:**

This facility shall maintain the following records for this source, in addition to those records referred to in paragraph (D) above:

Daily records of the hours of operation during which this boiler was firing No. 2 fuel oil and the cumulative total hours of such operation on a rolling 12 month basis. These records shall be signed daily by the owner/operator, attesting to the accuracy of the data.

- 2 For each shipment of oil, the volume of oil received and the results of the oil supplier's analyses. Data recorded shall include:
  - a) the total quantity of fuel oil received in each shipment (gallons),
  - b) the sulfur content (percent) of the oil received in each shipment,
  - c) the heat content (Btu per gallon) of oil received in each shipment,
  - d) the density (in pounds per gallon) of the oil received in each shipment,
  - e) the sulfur dioxide emission rate (pounds SO<sub>2</sub> per million Btu actual heat input) from fuel oil received in each shipment.

The sulfur dioxide emission rate shall be calculated using the formula found in OAC Rule 3745-18-04(F)(2).

- f) Monthly calculations of the weighted average sulfur content, heat content, density, SO<sub>2</sub> emission rate for the oil received during each calendar month, and the total gallons of fuel oil burned in this boiler during the month.

Compliance with the applicable SO<sub>2</sub> emission limitations shall be determined based on the weighted arithmetic average of all fuel analyses for each calendar month.

*[NOTE: A weighted average fuel quality value is determined by multiplying each fuel analysis value (Btu/gallon, SO<sub>2</sub> emission rate, etc.) by the weight or gallons of the shipment of fuel for which the quality value is representative, adding up all the value-weighted products, and dividing the sum of the value-weighted products by the sum of all the shipment weights or gallons.]*

These records, as well as any other supporting analyses, computations, operations logs, and fuel receipts, shall be retained on site in facility files for a period of not less than five (5) years and shall be made available to the Director or any authorized representative of the Director for review during normal business hours.

**G. REPORTING REQUIREMENTS:**

- 1) The owner/operator of this source shall notify the Ohio EPA immediately if any of the restrictions in Section E, paragraph (1), (2), or (3) above is exceeded.
- 2) This facility shall submit semi-annual reports to the Ohio EPA, Northeast District Office, which provide the following information for this source:
  - a) The total quantity of oil received and burned during each calendar month;
  - b) The weighted average heat content (Btu per gallon) of the oil received during each calendar month;
  - c) The weighted average SO<sub>2</sub> emission rate (pounds SO<sub>2</sub> per mmBtu actual heat input) for the fuel oil received during each calendar month;
  - d) The number of hours of boiler operation during which fuel oil was burned for each day during the reporting period and during each calendar month;
  - e) The rolling 12 month cumulative total of the hours of operation during which fuel oil was burned during the reporting period (after the first 12 months of operation under this permit);

- f) The rolling 12 month cumulative total gallons of fuel oil burned (consumed) in this boiler (after the first 12 months of operation under this permit); and
- g) The level of SO<sub>2</sub> emissions (in Tons) for each month as calculated from the monthly amount of oil burned (received) and the weighted average heat content and weighted average SO<sub>2</sub> emissions rate for the oil received.
- h) A copy of the oil supplier's analyses for each oil shipment received during the reporting period.

These reports shall be submitted by February 15 and August 15 of each year and shall cover operations for the previous six calendar months (July through December and January through June).

All reports required by these terms and conditions shall be sent to:

Ohio Environmental Protection Agency  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, Ohio 44087  
Phone: (216) 963-1200

**H) FEDERAL ENFORCEABILITY:**

Sections B(2), E, F, and G of these Special Terms and Conditions constitute the federally enforceable portions of this Permit to Operate.

## **SYNTHETIC MINOR DETERMINATION**

### **A) SOURCE DESCRIPTION:**

Miller Lumber Company has requested a modification in the Permit to Operate (PTO) for the 8.5 mmBtu/hour gas/oil fired stoker boiler at its facility at 7101 State Route 39, Millersburg, Ohio. The modification would result in a federally enforceable State operating permit sulfur dioxide emissions limit for this source (B007) of 8.51 tons/year. SO<sub>2</sub> emissions for the facility would be limited to 99.62 TPY due to four additional fossil fuel fired boilers also permitted at this facility.

### **B) FACILITY EMISSIONS AND AREA ATTAINMENT STATUS:**

Millersburg is in the central portion of Holmes County which is designated attainment for SO<sub>2</sub>. Current actual annual SO<sub>2</sub> emissions for this emissions unit are estimated to be 8.87 tons. Actual annual SO<sub>2</sub> emissions from this facility (including potential to emit of 60.25 tons SO<sub>2</sub> from a two coal fired stokers, a gas fired boiler, and a waste wood fired stoker/boiler) are estimated to be 69.12 tons.

### **C) MODIFIED SOURCE EMISSIONS LIMITATIONS:**

Through the "Additional Federally Enforceable Emissions Requirements for Sulfur Dioxide" section of this FESOP, this facility will be limited to annual SO<sub>2</sub> emissions of 99.62 TPY. This specific emissions unit (Source B007) will be restricted to annual SO<sub>2</sub> emissions of 8.51 tons. This will be achieved by limiting the sulfur content in the fuel oil purchased and burned in this 8.5 mmBtu/hour gas/oil fired boiler to 0.512 pounds of SO<sub>2</sub> per million Btu heat input, limiting the volume of fuel oil burned in this source to no more than 250,000 gallons per year, and limiting annual boiler operation using fuel oil firing to 3912 hour per year. Fuel oil quality values shall be determined by a weighted monthly average of supplier analyses of oil shipments during each month.

This facility will be required to record monthly volume and quality data for fuel oil burned in this boiler as well as the monthly operating time for oil firing and report this information on a semi-annual basis to NEDO.

### **D) CONCLUSIONS:**

NEDO believes that the fuel oil quality, oil volume, and operating time restrictions placed on this relatively small source will effectively limit this facility to "synthetic minor" status with regards to SO<sub>2</sub> emissions. The facility is a minor source for other air pollutants.

*The following terms and conditions will be included in each non-Title V permit under the General Conditions section.*

**1. Compliance Requirements**

The above-described emissions unit is and shall remain in full compliance with all applicable State 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 three 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 appropriate Ohio EPA District Office or local air agency. It is the permittee's responsibility to renew this permit even if no notice of its expiration is received.

The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

- 10. The permittee also is subject to the attached special terms and conditions.**