



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

09/17/98

CERTIFIED MAIL

08-29-09-0062

RE: Final Chapter 3745-35 Permit To Operate

Central State University
Herndon Cummings
1400 Brush Row Road
Wilberforce, OH 45384

Dear Herndon Cummings:

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
236 East Town Street
Room 300
Columbus, Ohio 43215

If you have any questions, please contact the RAPCA at (937) 225-4435.

Very truly yours,

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

cc: RAPCA
Jim Orlemann, DAPC Engineering
Becky Castle, DAPC PMU



PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 09/17/98

Facility ID: 08-29-09-0062

Expiration Date: 09/17/03

FINAL ISSUE

This document constitutes issuance for:

Central State University
Campus Drive
Wilberforce, OH 45384

of a permit to operate for:

B003 (Coal Fired Boiler)
Coal fired watertube steam boiler with chain grate stoker

PART I General Terms & 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 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).

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:

RAPCA
451 West Third Street
PO Box 972
Dayton, OH 45422
(937) 225-4435

You will be contacted approximately six months prior to expiration date regarding the renewal of this permit. If you are not contacted, please contact the RAPCA.

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in cursive script that reads "Donald R. Scheyardus". The signature is written in black ink and is positioned above a horizontal line.

Director

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
65 mmBtu/hr, coal-fired boiler # 1 controlled with a baghouse.	OAC rule 3745-31-05 (PTI 08-712)	0.10 pound of particulate emissions per mmBtu actual heat input 5.27 tons/yr of particulate emissions, based upon a rolling, 12-month summation
	OAC rule 3745-17-10(C)(1)	0.6 pound of nitrogen oxides per mmBtu actual heat input less than or equal to 10 percent opacity, as a 6-minute average, from the stack
	OAC rule 3745-17-07	less stringent than the particulate emission limit above
	OAC rule 3745-18-35(B)	less stringent than the opacity limit above
	OAC rule 3745-35-07	1.6 pounds of sulfur dioxide per mmBtu actual heat input 84.38 tons/yr of SO ₂ , based upon a rolling, 12-month summation, and 31.64 tons/yr of NO _x , based upon a rolling, 12-month summation

2. Additional Terms and Conditions

None

B. Operational Restrictions

1. The maximum annual coal usage for this emissions unit shall not exceed 4,219 tons, based upon a rolling 12-month summation of the coal usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit or restart of this emissions unit, the permittee shall not exceed the following coal usage levels:

Months	Maximum, Cumulative Total Coal Usage(tons)
1	351
1-2	703
1-3	1054
1-4	1406
1-5	1758
1-6	2109
1-7	2461
1-8	2812
1-9	3164
1-10	3515
1-11	4867
1-12	4219

After the first 12 calendar months of operation, the permittee shall comply with the annual coal usage limitation based upon rolling 12-month summations.

2. The quality of the coal burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in section A.1 above.
3. To ensure the baghouse is operated according to the manufacturer's specifications and to maintain compliance with the allowable particulate emission rate, a pressure drop across the baghouse of not less than 3 inches or greater than 6 inches shall be maintained at all times.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall properly operate and maintain a monitoring device capable of accurately measuring the pressure drop across the baghouse.
The permittee shall check the pressure drop once a day and maintain daily records of the pressure drop readings.
2. The permittee shall collect or require the coal supplier to collect a representative sample of coal for each shipment of coal which is received for burning in this emissions unit. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each month, the representative samples of coal for all shipments of coal which were received during that month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for sulfur content (percent) and heat content (Btu/pound of coal). The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: 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 Isooperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

C. Monitoring and/or Record Keeping Requirements (continued)

3. The permittee shall maintain monthly records of the following information:
 - a. the total quantity of coal burned (tons);
 - b. during the first 12 months of operation following the issuance of this permit, the cumulative number of tons of coal burned;
 - c. the rolling, 12-month summation of the coal burned (tons) (beginning the 13th calendar month after the final issuance of this permit or the restart of the unit);
 - d. the average sulfur content (percent) of the coal received;
 - e. the average heat content (Btu/lb and mmBtu/ton) of the coal received; and
 - f. the average sulfur dioxide emission rate (lb SO₂/mmBtu actual heat input) for the coal received.
4. The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

Each continuous emission monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

5. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

D. Reporting Requirements

1. In accordance with paragraph 3 of the General Terms and Conditions, the permittee shall submit deviation (excursion) reports which identify all exceedances of the following:
 - a. the cumulative number of tons of coal burned
 - b. the rolling, 12-month coal usage limit;
 - c. the allowable pressure drop range for the baghouse; and
 - d. the sulfur dioxide lb/mmBtu limit.
2. The permittee shall also submit annual reports which specify (a) total coal usage, (b) the particulate emissions, (c) the sulfur dioxide emissions, and (d) the nitrogen oxides emissions for the previous calendar year. These reports shall be submitted by January 31 of each year.

D. Reporting Requirements (continued)

3. The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the appropriate Ohio EPA, District Office or local air agency documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunction. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter.

E. Testing Requirements

1. Compliance Methods

Compliance with the emissions limitation(s) in section A.1 of these terms and conditions shall be determined in accordance with the following method(s):

- 1.a Emission Limitation-
0.10 lb particulate/mmBtu actual heat input

Applicable Compliance Method-
Compliance shall be based on stack testing per OAC rule 3745-17-03(B)(9).

- 1.b Emission Limitation-
5.27 tons/yr particulates, as a rolling, 12-month summation

Applicable Compliance Method-
Compliance shall be determined by multiplying the quantity of coal burned during the 12-month period (tons) times the average heat content of all the coal received during the same 12-month period (mmBtu/lb), and times the average emission rate determined from the most recent emission test that demonstrated that the emissions unit was in compliance (in lb particulates/mmBtu). (The average emission rate from the last emissions test conducted on February 14, 1996 was 0.018 lb part./mmBtu.)

- 1.c Emission Limitation-
1.6 lbs SO₂/mmBtu actual heat input

Applicable Compliance Method-
Compliance shall be based upon the record keeping requirements specified in section C.3 and the use of the equation contained in OAC rule 3745-18-04(F)(1). If required, compliance with this mass emission limitation shall be based on stack testing per OAC rule 3745-18-04(D)(1).

- 1.d Emission Limitation-
84.38 tons/yr of SO₂, as a rolling, 12-month summation

Applicable Compliance Method-
Compliance shall be determined by multiplying the quantity of coal burned during the 12-month period (tons) times the average heat content of all the coal received during the same 12-month period (mmBtu/lb), and times the average sulfur dioxide emission rate of all the coal received during the same 12-month period (lbs SO₂/mmBtu).

- 1.e Emission Limitation-
0.6 lb NO_x/mmBtu actual heat input

Applicable Compliance Method-
Compliance shall be based on conducting a stack test in accordance with USEPA Reference Method 7 of 40 CFR Part 60, Appendix A.

E. Testing Requirements (continued)

- 1.f Emission Limitation-
31.64 tons/yr NO_x, as a rolling, 12-month summation

Applicable Compliance Method-
Compliance shall be determined by multiplying the quantity of coal burned during the 12-month period (tons) times the average heat content of all the coal received during the same 12-month period (mmBtu/lb), and times the average emission rate determined from the most recent emission test that demonstrated that the emissions unit was in compliance (lb NO_x/mmBtu). (The average emission rate from the last emissions test conducted on February 14, 1996 was 0.015 lb NO_x/mmBtu.)

- 1.g Emission Limitation-
10 percent opacity, as a 6-minute average

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

2. Within 6 months prior to permit expiration, the permittee shall conduct, or have conducted, an emission test(s) for this emissions unit in order to demonstrate compliance with the allowable mass emission rate(s) for particulates and NO_x.

The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate(s): for particulates, USEPA Method 5 of 40 CFR Part 60, Appendix A and for NO_x, USEPA Method 7, 40 CFR Part 60, Appendix A. Alternative USEPA approved test methods may be used with prior approval from the Ohio EPA. The tests shall be conducted while the emissions unit is operating at or near maximum capacity and using only coal of the quality as specified in this permit, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and dates(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the field office's refusal to accept the results of the emissions test(s).

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

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

F. Miscellaneous Requirements

1. The permittee is hereby notified that this permit and all agency records concerning the operation of this permitted emissions unit are subject to public disclosure in accordance with OAC rule 3745-49-03.
2. The terms and conditions in sections A - F of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.