



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

09/16/97

**CERTIFIED MAIL**

13-18-41-2468

**RE: Final Chapter 3745-35 Permit To Operate**

Paddock Fishley Greenhouses, Inc.  
Don Paddock  
25137 Kennedy Ridge Road  
North Olmsted, OH 44070

Dear Don Paddock:

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. 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 Cleveland Division of Air Pollution Control at (216) 664-2324.

Very truly yours,

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

cc: Cleveland Division of Air Pollution Control  
Jim Orlemann, DAPC Engineering

Becky Castle, DAPC PMU



## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 09/16/97

Facility ID: 13-18-41-2468

Expiration Date: 09/16/00

FINAL ISSUE

This document constitutes issuance for:

Paddock Fishley Greenhouses, Inc.  
25137 Kennedy Ridge Road  
North Olmsted, OH 44070

of a permit to operate for:

B001 (gas fired boiler)

7.0 MMBTUH natural gas/oil fired boiler for heating greenhouse (emergency use only)

### 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:

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:

Cleveland Division of Air Pollution Control  
1925 St. Clair  
Cleveland, OH 44114  
(216) 664-2324

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 appropriate DO or LAA.

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

A handwritten signature in cursive script, reading "Donald R. Schlegel". 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
7.0 MMBTU/hr natural gas/No. 2 fuel oil fired boiler	OAC 3745-17-07(A) OAC 3745-17-10	See 2.a below.  The particulate emissions from this emissions unit shall not exceed 0.020 pounds per million Btu (MMBtu).

**2. Additional Terms and Conditions**

**2.a VISIBLE PARTICULATE EMISSION RESTRICTIONS:**

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

- i. Except as provided below, visible particulate emissions from the stack shall not exceed an opacity of twenty (20) percent as a six-minute average.
- ii. 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.

**2.b** Sulfur dioxide (SO<sub>2</sub>) emissions from this facility shall be limited to 80.40 tons per year. Sulfur dioxide emissions from this emissions unit shall not exceed 0.80 pound per million Btu of heat input. Sulfur dioxide emissions from emissions units B001-B003 shall not exceed 5.4 tons per year.

**2.c** Each shipment of No. 2 fuel oil used in this emissions unit shall comply with the following specifications:

- i. Sulfur content of no greater than 0.7 percent by weight.
- ii. Heat content of no less than 133,000 BTU per gallon.
- iii. Average density of no greater than 7.6 pounds per gallon.

**B. Operational Restrictions**

1. Natural gas usage in emissions units B001-B003 shall be limited to 7,500 M cubic feet per year based upon a rolling 12-month summation of the natural gas usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the total cumulative monthly natural gas usage limits for each specified time period as shown in the table below.

Month(s)	Maximum Allowable Cumulative Natural Gas Usage (MCF)
1	2500
1-2	5000
1-3	7500
1-4	7500
1-5	7500
1-6	7500
1-7	7500
1-8	7500
1-9	7500
1-10	7500
1-11	7500
1-12	7500

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling, 12-month summation of the natural gas usage.

2. No. 2 fuel oil usage in emissions units B001-B003 shall be limited to 75,000 gallons per year based upon a rolling 12-month summation of the No. 2 fuel oil usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the total cumulative monthly fuel oil usage limits for each specified time period as shown in the table below.

Month(s)	Maximum Allowable Cumulative No. 2 Fuel Oil Usage (gallons)
1	25,000
1-2	50,000
1-3	75,000
1-4	75,000
1-5	75,000
1-6	75,000
1-7	75,000
1-8	75,000
1-9	75,000
1-10	75,000
1-11	75,000
1-12	75,000

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual No. 2 fuel oil usage limitation shall be based upon a rolling, 12-month summation of the No. 2 fuel oil usage.

3. This emissions unit shall be used in emergency circumstances only.
4. This emissions unit shall use only natural gas or No. 2 fuel oil for fuel.
5. The maximum heat input for this emissions unit shall not exceed 7.0 MMBtu per hour, the maximum rated capacity.

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

1. The permittee shall maintain monthly records of the following information:
  - 1.a The total number of cubic feet of natural gas burned in this emissions unit.
  - 1.b The total number of cubic feet of natural gas burned in emissions units B001-B003.
  - 1.c During the first 12 calendar months of operation following the issuance of this permit, the cumulative number of cubic feet of natural gas burned in emissions units B001-B003 for each calendar month.

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Facility Name: Paddock Fishley Greenhouses, Inc.  
Facility ID: 13-18-41-2468  
Emissions Unit: gas fired boiler (B001)

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

- 1.d Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total number of cubic feet of natural gas burned in emissions units B001-B003.
- 1.e The total number of gallons of No. 2 fuel oil burned in this emissions unit.
- 1.f The total number of gallons of No. 2 fuel oil burned in emissions units B001-B003.
- 1.g During the first 12 calendar months of operation following the issuance of this permit, the cumulative number of gallons of No. 2 fuel oil burned in emissions units B001-B003 for each calendar month.
- 1.h Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total number of gallons of No. 2 fuel oil burned in emissions units B001-B003.
2. For each shipment of No. 2 fuel oil, the permittee shall maintain records of the following information:
  - 2.a The total quantity of fuel oil received (gallons).  
The sulfur content (percent) of the fuel oil.
  - 2.c The heat content (Btu per gallon) of the fuel oil received.
  - 2.d The density (pounds per gallon) of the fuel oil.

### D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month natural gas usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage levels.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month No. 2 fuel oil usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative No. 2 fuel oil usage levels.
3. The permittee shall submit annual reports which provide the information described in the following paragraphs. These reports shall be submitted by January 31 of each year, and shall cover operations for the previous calendar year.
  - 3.a The total number of cubic feet of natural gas burned in emissions units B001-B003.  
The total number of gallons of No. 2 fuel oil received and burned in emissions units B001-B003.
  - 3.c The total actual emissions of sulfur dioxide for emissions units B001-B003.
  - 3.d A copy of the oil supplier's analyses for each oil shipment received during the reporting period.
4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the fuel quality restrictions specified in Section A.2.c.

### E. Testing Requirements

1. Compliance with the fuel specifications for sulfur, heat content, and density, which are described in Section A.2.d of this permit, 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 by the appropriate ASTM methods (ASTM method D4294, ASTM method D240 or ASTM method 6010 for sulfur content and ASTM method D240 for heat content) or by an equivalent method approved by the Director of the Ohio EPA.
2. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

## E. Testing Requirements (continued)

### 2.a Emission Limitation - 0.020 lb particulate/MMBTU actual heat input

#### Applicable Compliance Method -

For the use of natural gas, compliance shall be based upon multiplying the hourly gas burning capacity of the emissions unit (0.007 MMCF/hr) by the AP-42 emission factor for natural gas (4.5 lbs particulate/MMCF), and dividing by the maximum hourly heat input capacity of the emissions unit (7.0 MMBTU/hr). For the use of No. 2 oil, compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (50 gal/hr) by the AP-42 emission factor for No. 2 oil (2.0 lbs particulate/1000 gallons), and dividing by the maximum hourly heat input capacity of the emissions unit (7.0 MMBTU/hr).

### 2.b Emission Limitation - 0.80 lb SO<sub>2</sub>/MMBTU actual heat input

#### i. No. 2 fuel oil usage

##### Applicable Compliance Method -

Compliance shall be based upon the record keeping and analysis requirements specified in C.2 and E.1, and the use of the equation contained in OAC rule 3745-18-04(F)(2).

#### ii. Natural gas usage

##### Applicable Compliance Method -

Compliance shall be based upon multiplying the hourly gas burning capacity of the emissions unit (0.007 MMCF/hr) by the AP-42 emission factor for natural gas (0.6 lb SO<sub>2</sub>/MMCF), and dividing by the maximum hourly heat input capacity of the emissions unit (7.0 MMBTU/hr).

### Emission Limitation - 5.4 TPY SO<sub>2</sub> for B001-B003

#### Applicable Compliance Method -

Compliance shall be determined by summing the sulfur dioxide emissions from the burning of No. 2 oil and natural gas in emissions units B001, B002 and B003. The sulfur dioxide emissions from No. 2 oil shall be determined by multiplying the rolling, 12-month summation of the No. 2 oil usage by the AP-42 emission factor for No. 2 oil (142 lb SO<sub>2</sub>/1000 gallons times the average sulfur content in weight %), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions from natural gas shall be determined by multiplying the rolling, 12-month summation of the natural gas usage by the AP-42 emission factor for natural gas (0.6 lb SO<sub>2</sub>/MMCF), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions shall be summed for each rolling 12-month period.

### Emission Limitation - 80.4 TPY SO<sub>2</sub> for B001-B004

#### Applicable Compliance Method -

The sulfur dioxide emissions from No. 2 oil shall be determined by multiplying the rolling, 12-month summation of the No. 2 oil usage in B001-B003 by the AP-42 emission factor for No. 2 oil (142 lb SO<sub>2</sub>/1000 gallons times the average sulfur content in weight %), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions from natural gas shall be determined by multiplying the rolling, 12-month summations of the natural gas usage in B001-B004 by the AP-42 emission factor for natural gas (0.6 lb SO<sub>2</sub>/MMCF), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions from the burning of coal in B004 shall be determined by multiplying the rolling, 12-month summation of the coal usage by the AP-42 emission factor for coal (31 lb SO<sub>2</sub>/ton times the average sulfur content in weight %), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions from oil, natural gas, and coal usage shall be summed for each rolling 12-month period for B001-B004.

### Emission Limitation -

20% opacity visible emission limitation, except for one six-minute period in any hour when up to 60% opacity is permissible

#### 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.

## F. Miscellaneous Requirements

1. The federally enforceable part of this permit consists of Sections A-F.



## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 9/16/97

Facility ID: 13-18-41-2468

Expiration Date: 09/16/00

FINAL ISSUE

This document constitutes issuance for: Paddock Fishley Greenhouses, Inc.  
25137 Kennedy Ridge Road  
North Olmsted, OH 44070

of a permit to operate for:

B002 (gas fired boiler)  
7.0 MMBTUH natural gas/oil fired boiler for heating greenhouse (emergency use only)

### 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).

#### **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.

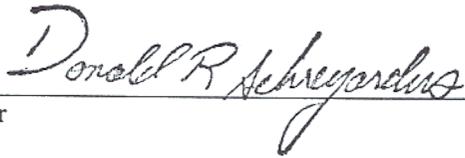
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Cleveland Division of Air Pollution Control  
1925 St. Clair  
Cleveland, OH 44114  
(216) 664-2324

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 appropriate DO or LAA.

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

**OHIO ENVIRONMENTAL PROTECTION AGENCY**

A handwritten signature in cursive script, reading "Donald R. Schreyer", is written over 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
7.0 MMBTU/hr natural gas/No. 2 fuel oil fired boiler	OAC 3745-17-07(A) OAC 3745-17-10	See 2.a below  The particulate emissions from this emissions unit shall not exceed 0.020 pounds per million Btu (MMBtu).

**2. Additional Terms and Conditions**

**2.a VISIBLE PARTICULATE EMISSION RESTRICTIONS**

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

- i. Except as provided below, visible particulate emissions from the stack shall not exceed an opacity of twenty (20) percent as a six-minute average.
- ii. 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.

**2.b** Sulfur dioxide (SO<sub>2</sub>) emissions from this facility shall be limited to 80.40 tons per year. Sulfur dioxide emissions from this emissions unit shall not exceed 0.80 pound per million Btu of heat input. Sulfur dioxide emissions from emissions units B001-B003 shall not exceed 5.4 tons per year.

- 2.c** Each shipment of No. 2 fuel oil used in this emissions unit shall comply with the following specifications:
- i. Sulfur content of no greater than 0.7 percent by weight.
  - ii. Heat content of no less than 133,000 BTU per gallon.
  - iii. Average density of no greater than 7.6 pounds per gallon.

**B. Operational Restrictions**

1. Natural gas usage in emissions units B001-B003 shall be limited to 7,500 M cubic feet per year based upon a rolling 12-month summation of the natural gas usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the total cumulative monthly natural gas usage limits for each specified time period as shown in the table below.

Month(s)	Maximum Allowable Cumulative Natural Gas Usage (MCF)
1	2500
1-2	5000
1-3	7500
1-4	7500
1-5	7500
1-6	7500
1-7	7500
1-8	7500
1-9	7500
1-10	7500
1-11	7500
1-12	7500

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling, 12-month summation of the natural gas usage.

2. No. 2 fuel oil usage in emissions units B001-B003 shall be limited to 75,000 gallons per year based upon a rolling 12-month summation of the No. 2 fuel oil usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the total cumulative monthly fuel oil usage limits for each specified time period as shown in the table below.

Month(s)	Maximum Allowable Cumulative No. 2 Fuel Oil Usage (gallons)
1	25,000
1-2	50,000
1-3	75,000
1-4	75,000
1-5	75,000
1-6	75,000
1-7	75,000
1-8	75,000
1-9	75,000
1-10	75,000
1-11	75,000
1-12	75,000

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual No. 2 fuel oil usage limitation shall be based upon a rolling, 12-month summation of the No. 2 fuel oil usage.

3. This emissions unit shall be used in emergency circumstances only.
4. This emissions unit shall use only natural gas or No. 2 fuel oil for fuel.
5. The maximum heat input for this emissions unit shall not exceed 7.0 MMBtu per hour, the maximum rated capacity.

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

1. The permittee shall maintain monthly records of the following information:  
 The total number of cubic feet of natural gas burned in this emissions unit.
- 1.b The total number of cubic feet of natural gas burned in emissions units B001-B003.
- 1.c During the first 12 calendar months of operation following the issuance of this permit, the cumulative number of cubic feet of natural gas burned in emissions units B001-B003 for each calendar month.

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Facility Name: Paddock Fishley Greenhouses, Inc.  
Facility ID: 13-18-41-2468  
Emissions Unit: gas fired boiler (B002)

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

- 1.d Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total number of cubic feet of natural gas burned in emissions units B001-B003.
- 1.e The total number of gallons of No. 2 fuel oil burned in this emissions unit.
- 1.f The total number of gallons of No. 2 fuel oil burned in emissions units B001-B003.
- 1.g During the first 12 calendar months of operation following the issuance of this permit, the cumulative number of gallons of No. 2 fuel oil burned in emissions units B001-B003 for each calendar month.
- 1.h Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total number of gallons of No. 2 fuel oil burned in emissions units B001-B003.
2. For each shipment of No. 2 fuel oil, the permittee shall maintain records of the following information:
  - 2.a The total quantity of fuel oil received (gallons).
  - 2.b The sulfur content (percent) of the fuel oil.
  - 2.c The heat content (Btu per gallon) of the fuel oil received.
  - 2.d The density (pounds per gallon) of the fuel oil.

**D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month natural gas usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage levels.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month No. 2 fuel oil usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative No. 2 fuel oil usage levels.
3. The permittee shall submit annual reports which provide the information described in the following paragraphs. These reports shall be submitted by January 31 of each year, and shall cover operations for the previous calendar year.
  - 3.a The total number of cubic feet of natural gas burned in emissions units B001-B003.
  - 3.b The total number of gallons of No. 2 fuel oil received and burned in emissions units B001-B003.
  - 3.c The total actual emissions of sulfur dioxide for emissions units B001-B003.
  - 3.d A copy of the oil supplier's analyses for each oil shipment received during the reporting period.
4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the fuel quality restrictions specified in Section A.2.c.

**E. Testing Requirements**

1. Compliance with the fuel specifications for sulfur, heat content, and density, which are described in Section A.2.d of this permit, 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 by the appropriate ASTM methods (ASTM method D4294, ASTM method D240 or ASTM method 6010 for sulfur content and ASTM method D240 for heat content) or by an equivalent method approved by the Director of the Ohio EPA.
2. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

## E. Testing Requirements (continued)

- 2.a Emission Limitation -  
0.020 lb particulate/MMBTU actual heat input

Applicable Compliance Method -

For the use of natural gas, compliance shall be based upon multiplying the hourly gas burning capacity of the emissions unit (0.007 MMCF/hr) by the AP-42 emission factor for natural gas (4.5 lbs particulate/MMCF), and dividing by the maximum hourly heat input capacity of the emissions unit (7.0 MMBTU/hr). For the use of No. 2 oil, compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (50 gal/hr) by the AP-42 emission factor for No. 2 oil (2.0 lbs particulate/1000 gallons), and dividing by the maximum hourly heat input capacity of the emissions unit (7.0 MMBTU/hr).

- 2.b Emission Limitation -  
0.80 lb SO<sub>2</sub>/MMBTU actual heat input

i. No. 2 fuel oil usage

Applicable Compliance Method -

Compliance shall be based upon the record keeping and analysis requirements specified in C.2 and E.1, and the use of the equation contained in OAC rule 3745-18-04(F)(2).

ii. Natural gas usage

Applicable Compliance Method -

Compliance shall be based upon multiplying the hourly gas burning capacity of the emissions unit (0.007 MMCF/hr) by the AP-42 emission factor for natural gas (0.6 lb SO<sub>2</sub>/MMCF), and dividing by the maximum hourly heat input capacity of the emissions unit (7.0 MMBTU/hr).

- 2.c Emission Limitation -  
5.4 TPY SO<sub>2</sub> for B001-B003

Applicable Compliance Method -

Compliance shall be determined by summing the sulfur dioxide emissions from the burning of No. 2 oil and natural gas in emissions units B001, B002 and B003. The sulfur dioxide emissions from No. 2 oil shall be determined by multiplying the rolling, 12-month summation of the No. 2 oil usage by the AP-42 emission factor for No. 2 oil (142 lb SO<sub>2</sub>/1000 gallons times the average sulfur content in weight %), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions from natural gas shall be determined by multiplying the rolling, 12-month summation of the natural gas usage by the AP-42 emission factor for natural gas (0.6 lb SO<sub>2</sub>/MMCF), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions shall be summed for each rolling 12-month period.

- 2.d Emission Limitation -  
80.4 TPY SO<sub>2</sub> for B001-B004

Applicable Compliance Method -

The sulfur dioxide emissions from No. 2 oil shall be determined by multiplying the rolling, 12-month summation of the No. 2 oil usage in B001-B003 by the AP-42 emission factor for No. 2 oil (142 lb SO<sub>2</sub>/1000 gallons times the average sulfur content in weight %), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions from natural gas shall be determined by multiplying the rolling, 12-month summations of the natural gas usage in B001-B004 by the AP-42 emission factor for natural gas (0.6 lb SO<sub>2</sub>/MMCF), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions from the burning of coal in B004 shall be determined by multiplying the rolling, 12-month summation of the coal usage by the AP-42 emission factor for coal (31 lb SO<sub>2</sub>/ton times the average sulfur content in weight %), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions from oil, natural gas, and coal usage shall be summed for each rolling 12-month period for B001-B004.

Emission Limitation -

20% opacity visible emission limitation, except for one six-minute period in any hour when up to 60% opacity is permissible

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.

## F. Miscellaneous Requirements

1. The federally enforceable part of this permit consists of Sections A-F.



## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 9/16/97

Facility ID: 13-18-41-2468

Expiration Date: 09/16/00

FINAL ISSUE

This document constitutes issuance for:

Paddock Fishley Greenhouses, Inc.  
25137 Kennedy Ridge Road  
North Olmsted, OH 44070

of a permit to operate for:

B003 (gas fired boiler)

7.0 MMBTUH natural gas/oil fired boiler for heating greenhouse (emergency use only)

### 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).

#### **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.

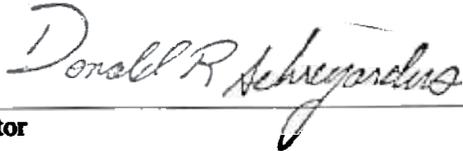
The following Ohio EPA District Office or local air agency has jurisdiction in the area in which the facility is located:

Cleveland Division of Air Pollution Control  
1925 St. Clair  
Cleveland, OH 44114  
(216) 664-2324

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 appropriate DO or LAA.

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

**OHIO ENVIRONMENTAL PROTECTION AGENCY**

A handwritten signature in cursive script, reading "Donald R. Schreyer", is written over 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
7.0 MMBTU/hr natural gas/No. 2 fuel oil fired boiler	OAC 3745-17-07(A)  OAC 3745-17-10	See 2.a below.  The particulate emissions from this emissions unit shall not exceed 0.020 pounds per million Btu (MMBtu).

**2. Additional Terms and Conditions**

**2.a VISIBLE PARTICULATE EMISSION RESTRICTIONS:**

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

- i. Except as provided below, visible particulate emissions from the stack shall not exceed an opacity of twenty (20) percent as a six-minute average.
- ii. 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.

**2.b** Sulfur dioxide (SO<sub>2</sub>) emissions from this facility shall be limited to 80.40 tons per year. Sulfur dioxide emissions from this emissions unit shall not exceed 0.80 pound per million Btu of heat input. Sulfur dioxide emissions from emissions units B001-B003 shall not exceed 5.4 tons per year.

**2.c** Each shipment of No. 2 fuel oil used in this emissions unit shall comply with the following specifications:

- i. Sulfur content of no greater than 0.7 percent by weight.
- ii. Heat content of no less than 133,000 BTU per gallon.
- iii. Average density of no greater than 7.6 pounds per gallon.

**B. Operational Restrictions**

1. Natural gas usage in emissions units B001-B003 shall be limited to 7,500 M cubic feet per year based upon a rolling 12-month summation of the natural gas usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the total cumulative monthly natural gas usage limits for each specified time period as shown in the table below.

Month(s)	Maximum Allowable Cumulative Natural Gas Usage (MCF)
1	2500
1-2	5000
1-3	7500
1-4	7500
1-5	7500
1-6	7500
1-7	7500
1-8	7500
1-9	7500
1-10	7500
1-11	7500
1-12	7500

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling, 12-month summation of the natural gas usage.

2. No. 2 fuel oil usage in emissions units B001-B003 shall be limited to 75,000 gallons per year based upon a rolling 12-month summation of the No. 2 fuel oil usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the total cumulative monthly fuel oil usage limits for each specified time period as shown in the table below.

Month(s)	Maximum Allowable Cumulative No. 2 Fuel Oil Usage (gallons)
1	25,000
1-2	50,000
1-3	75,000
1-4	75,000
1-5	75,000
1-6	75,000
1-7	75,000
1-8	75,000
1-9	75,000
1-10	75,000
1-11	75,000
1-12	75,000

After the first 12 calendar months of operation following issuance of this permit, compliance with the annual No. 2 fuel oil usage limitation shall be based upon a rolling, 12-month summation of the No. 2 fuel oil usage.

3. This emissions unit shall be used in emergency circumstances only.
4. This emissions unit shall use only natural gas or No. 2 fuel oil for fuel.
5. The maximum heat input for this emissions unit shall not exceed 7.0 MMBtu per hour, the maximum rated capacity.

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

1. The permittee shall maintain monthly records of the following information:
  - 1.a The total number of cubic feet of natural gas burned in this emissions unit.
  - 1.b The total number of cubic feet of natural gas burned in emissions units B001-B003.
  - 1.c During the first 12 calendar months of operation following the issuance of this permit, the cumulative number of cubic feet of natural gas burned in emissions units B001-B003 for each calendar month.

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

- 1.d Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total number of cubic feet of natural gas burned in emissions units B001-B003.
- 1.e The total number of gallons of No. 2 fuel oil burned in this emissions unit.
- 1.f The total number of gallons of No. 2 fuel oil burned in emissions units B001-B003.

During the first 12 calendar months of operation following the issuance of this permit, the cumulative number of gallons of No. 2 fuel oil burned in emissions units B001-B003 for each calendar month.

- 1.h Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the total number of gallons of No. 2 fuel oil burned in emissions units B001-B003.
- 2. For each shipment of No. 2 fuel oil, the permittee shall maintain records of the following information:
  - The total quantity of fuel oil received (gallons).
- 2.b The sulfur content (percent) of the fuel oil.
  - The heat content (Btu per gallon) of the fuel oil received.
- 2.d The density (pounds per gallon) of the fuel oil.

**D. Reporting Requirements**

- 1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month natural gas usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage levels.
- 2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month No. 2 fuel oil usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative No. 2 fuel oil usage levels.
- 3. The permittee shall submit annual reports which provide the information described in the following paragraphs. These reports shall be submitted by January 31 of each year, and shall cover operations for the previous calendar year.
  - 3.a The total number of cubic feet of natural gas burned in emissions units B001-B003.
  - 3.b The total number of gallons of No. 2 fuel oil received and burned in emissions units B001-B003.
    - The total actual emissions of sulfur dioxide for emissions units B001-B003.
  - 3.d A copy of the oil supplier's analyses for each oil shipment received during the reporting period.
- 4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the fuel quality restrictions specified in Section A.2.c.

**E. Testing Requirements**

- 1. Compliance with the fuel specifications for sulfur, heat content, and density, which are described in Section A.2.d of this permit, 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 by the appropriate ASTM methods (ASTM method D4294, ASTM method D240 or ASTM method 6010 for sulfur content and ASTM method D240 for heat content) or by an equivalent method approved by the Director of the Ohio EPA.
- 2. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

## E. Testing Requirements (continued)

### 2.a Emission Limitation - 0.020 lb particulate/MMBTU actual heat input

#### Applicable Compliance Method -

For the use of natural gas, compliance shall be based upon multiplying the hourly gas burning capacity of the emissions unit (0.007 MMCF/hr) by the AP-42 emission factor for natural gas (4.5 lbs particulate/MMCF), and dividing by the maximum hourly heat input capacity of the emissions unit (7.0 MMBTU/hr). For the use of No. 2 oil, compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (50 gal/hr) by the AP-42 emission factor for No. 2 oil (2.0 lbs particulate/1000 gallons), and dividing by the maximum hourly heat input capacity of the emissions unit (7.0 MMBTU/hr).

### 2.b Emission Limitation - 0.80 lb SO<sub>2</sub>/MMBTU actual heat input

#### i. No. 2 fuel oil usage

#### Applicable Compliance Method -

Compliance shall be based upon the record keeping and analysis requirements specified in C.2 and E.1, and the use of the equation contained in OAC rule 3745-18-04(F)(2).

#### ii. Natural gas usage

#### Applicable Compliance Method -

Compliance shall be based upon multiplying the hourly gas burning capacity of the emissions unit (0.007 MMCF/hr) by the AP-42 emission factor for natural gas (0.6 lb SO<sub>2</sub>/MMCF), and dividing by the maximum hourly heat input capacity of the emissions unit (7.0 MMBTU/hr).

### 2.c Emission Limitation - 5.4 TPY SO<sub>2</sub> for B001-B003

#### Applicable Compliance Method -

Compliance shall be determined by summing the sulfur dioxide emissions from the burning of No. 2 oil and natural gas in emissions units B001, B002 and B003. The sulfur dioxide emissions from No. 2 oil shall be determined by multiplying the rolling, 12-month summation of the No. 2 oil usage by the AP-42 emission factor for No. 2 oil (142 lb SO<sub>2</sub>/1000 gallons times the average sulfur content in weight %), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions from natural gas shall be determined by multiplying the rolling, 12-month summation of the natural gas usage by the AP-42 emission factor for natural gas (0.6 lb SO<sub>2</sub>/MMCF), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions shall be summed for each rolling 12-month period.

### Emission Limitation - 80.4 TPY SO<sub>2</sub> for B001-B004

#### Applicable Compliance Method -

The sulfur dioxide emissions from No. 2 oil shall be determined by multiplying the rolling, 12-month summation of the No. 2 oil usage in B001-B003 by the AP-42 emission factor for No. 2 oil (142 lb SO<sub>2</sub>/1000 gallons times the average sulfur content in weight %), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions from natural gas shall be determined by multiplying the rolling, 12-month summations of the natural gas usage in B001-B004 by the AP-42 emission factor for natural gas (0.6 lb SO<sub>2</sub>/MMCF), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions from the burning of coal in B004 shall be determined by multiplying the rolling, 12-month summation of the coal usage by the AP-42 emission factor for coal (31 lb SO<sub>2</sub>/ton times the average sulfur content in weight %), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions from oil, natural gas, and coal usage shall be summed for each rolling 12-month period for B001-B004.

#### Emission Limitation -

20% opacity visible emission limitation, except for one six-minute period in any hour when up to 60% opacity is permissible

#### 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.

## F. Miscellaneous Requirements

1. The federally enforceable part of this permit consists of Sections A-F.



## PERMIT TO OPERATE AN EMISSIONS UNIT

Effective Date: 9/16/97

Facility ID: 13-18-41-2468

Expiration Date: 09/16/00

FINAL ISSUE

This document constitutes issuance for:

Paddock Fishley Greenhouses, Inc.  
25137 Kennedy Ridge Road  
North Olmsted, OH 44070

of a permit to operate for:

B004 (coal fired boiler)  
10.0 MMBTUH coal fired boiler for heating greenhouse

### PART I General Terms & Conditions

#### 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).

#### **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:

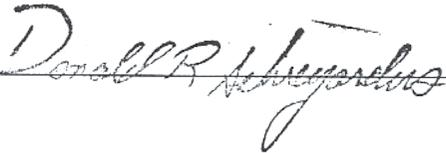
Cleveland Division of Air Pollution Control  
1925 St. Clair  
Cleveland, OH 44114  
(216) 664-2324

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 appropriate DO or LAA.

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Director



A handwritten signature in cursive script, reading "Donald R. Scheyers", is written over a horizontal line. The signature is positioned to the right of the printed word "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
10.0 MMBTU/HR Keeler natural gas and coal-fired boiler with cyclone dust collector	OAC Rule 3745-17-07 (A)	See 2.a and 2.b below
	OAC Rule 3745-17-10(C)(7)	See 2.c and 2.e below, and B.5-B.7.

**2. Additional Terms and Conditions**

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

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

- i. The start-up of the emissions unit 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.
- ii. The shutdown of the emissions unit for a period of not more than three (3) hours.
- iii. The malfunction of the emissions unit or associated equipment, if the owner of the source or operator of the equipment complies with the requirements of OAC Rule 3745-15-06.
- iv. Intermittent soot-blowing operations (the cleaning of heat transfer surfaces with pressurized air or steam.)
- v. Intermittent ash removal operations (the dumping or pulling of ash).
- vi. 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.

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

- 2.c This emissions unit shall be operated and maintained in a manner which will optimize combustion efficiency and minimize visible particulate emissions.
- 2.d Total emissions of sulfur dioxide from this facility shall not exceed 80.4 tons per year. Sulfur dioxide emissions from this emissions unit shall not exceed 25.6 pounds per hour.