Facility ID: 0812100223 Issuance type: Draft State Permit To Operate

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In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 0812100223 Emissions Unit ID: B001 Issuance type: Draft State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

   (a) None.

2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

   (a) None.

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
Boiler - natural gas and No. 2 fuel oil (79.6 MMBTU/hr maximum capacity)	3745-17-10(B)(1)	0.020 pound of particulate emissions per MMBTU actual heat input
	3745-17-07(A)	Opacity shall not exceed 20 percent except for one six-minute period in any hour when up to 60 percent is permissible
	3745-35-07	0.52 pound sulfur dioxides per MMBTU actual heat input, when burning No. 2 oil 0.0006 pound of sulfur dioxides per MMBTU actual heat input, when burning natural gas 0.15 pound of nitrogen oxides per MMBTU actual heat input, when burning No. 2 oil 0.14 pound of nitrogen oxides per MMBTU atual heat input, when burning natural gas

2. **Additional Terms and Conditions**

   (a) The permittee operates three identical natural gas/No. 2 oil boilers identified by Ohio EPA IDs 0812100223 B001, B002 and B003. Each boiler has a maximum rated capacity of 79.6 MMBTU/hr.
   The maximum No. 2 oil usage for the three boilers combined shall not exceed 250,000 gallons based on a rolling, 12-month summation.
   The maximum natural gas usage for the three boilers combined shall not exceed 650 million cubic feet based on a rolling, 12-month summation.
   The emissions of nitrogen oxides from the three boilers combined shall not exceed 48.0 tons based on a rolling, 12 month summation.
   The emissions of sulfur dioxide from the three boilers combined shall not exceed 9.2 tons based on a rolling 12-month summation.

B. **Operational Restrictions**

1. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following No. 2 oil usage for the three boilers combined:

   Months Maximum, Cumulative Total No. 2 Oil Usage

   1 20,833 gallons
   1-2 41,667 gallons
   1-3 62,500 gallons
   1-4 83,333 gallons
   1-5 104,167 gallons
   1-6 125,000 gallons
   1-7 145,833 gallons
   1-8 166,667 gallons
   1-9 187,500 gallons

1-10 208,833 gallons
1-11 229,167 gallons
1-12 250,000 gallons

After the first twelve calendar months of operation following the effective date of this permit, the permittee shall comply with the annual No. 2 oil usage limitation based upon rolling twelve-month summations.

2. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the following natural gas usage for the three boilers combined:

Months Maximum, Cumulative Total Natural Gas Usage

1 54 MMCF
1-2 108 MMCF
1-3 162 MMCF
1-4 216 MMCF
1-5 270 MMCF
1-6 325 MMCF
1-7 379 MMCF
1-8 433 MMCF
1-9 488 MMCF
1-10 542 MMCF
1-11 596 MMCF
1-12 650 MMCF

After the first twelve calendar months of operation following the effective date of this permit, the permittee shall comply with the annual natural gas usage limitation based upon rolling twelve-month summations.

3. The quality of the oil burned in this emissions unit shall meet the following specifications on an "as-received" basis:

a. A sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.52 pound sulfur dioxide/MMBTU actual heat input; and

b. Greater than 135,000 BTU/gallon of oil.

Compliance with the above-mentioned specifications shall be determined using the analytical results provided by the permittee or oil supplier for each shipment of oil.

4. This emissions unit is permitted for natural gas and No. 2 fuel oil only. No other fuels shall be used in this emissions unit.

C. **Monitoring and/or Record Keeping Requirements**

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO2 emission rate in lb/MMBTU.

2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. 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 D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

3. The permittee shall maintain monthly records of the following information for emissions units B001, B002 and B003 combined:

a. the total amount of No. 2 oil burned (gallons);
b. the rolling, 12-month summation of the No. 2 oil usage (gallons);
c. the amount of natural gas burned (cubic feet);
d. the rolling, 12-month summation of natural gas usage (cubic feet);
e. the calculated emission rate of nitrogen oxides, in tons;
f. the rolling, 12-month summation of the nitrogen oxides emission rates, in tons;
g. the calculated emission rate of sulfur dioxides, in tons; and
h. the rolling, 12-month summation of the sulfur dioxide emission rates, in tons.

D. **Reporting Requirements**

1. The permittee shall notify the Director (the appropriate District Office or local air agency) of any deviation of the No. 2 fuel oil specifications required in Section B.3 above. The notification shall include a copy of the results of the fuel analyses and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the exceedance occurs.

2. The permittee shall submit deviation (excursion) reports which identify all exceedances of:

a. the rolling, 12-month, No. 2 oil usage limitation;
b. the rolling, 12-month, natural gas usage limitation;
c. the rolling, 12-month, nitrogen oxides limitation;
d. the rolling, 12-month, sulfur dioxide limitation; and
e. for the first 12 calendar months of operation following the issuance of this permit, the maximum allowable cumulative No. 2 oil and natural gas usage levels.

Each report shall be in writing and shall be sent to the Director (the appropriate District Office or local air agency) within 30 days after the exceedance occurs.

3. The permittee shall also submit annual reports which specify (a) the total No. 2 oil usage, (b) the total natural gas usage, (c) the nitrogen oxides emissions, and (d) the sulfur dioxide emissions for emissions units B001, B002

and B003 for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. **Testing Requirements**

1. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):
Emission Limitation -
0.020 lb particulate/MMBTU actual heat input

Applicable Compliance Method -
For the use of natural gas, compliance shall be based upon mutliplying the hourly gas burning capacity of the emissions unit (0.0796 MMCF/hr) by the AP-42 emission factor for natural gas (5.0 lbs particulate/MMCF), and dividing by the maximum hourly heat input capacity of the emissions unit (79.6 MMBTU/hr). For the use of No. 2 oil, compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (576.8 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 (79.6 MMBTU/hr).
Emission Limitation -
0.52 lb SO2/MMBTU actual heat input when burning No. 2 oil

Applicable Compliance Method -
Compliance shall be based upon the record keeping and analysis requirements specified in C.1 and C.2, and the use of the equation contained in OAC rule 3745-18-04(F)(2).
Emission Limitation -
0.0006 lb SO2/MMBTU actual heat input when burning natural gas

Applicable Compliance Method -
Compliance shall be based upon multiplying the hourly gas burning capacity of the emissions unit (0.0796 MMCF/hr) by the AP-42 emission factor for natural gas (0.6 lb SO2/MMCF), and dividing by the maximum hourly heat input capacity of the emissions unit (79.6 MMBTU/hr). If required, compliance shall be based upon conducting a stack test in accordance with USEPA Reference Method 6, of 40 CFR Part 60, Appendix A.
Emission Limitation -
0.15 lb NOx/MMBTU actual heat input when burning No. 2 oil

Applicable Compliance Method -
Compliance shall be based upon multiplying the maximum fuel oil capacity of the emissions unit (576.8 gal/hr) by the AP-42 emission factor for No. 2 oil (20 lb NOx/1000 gallons), and dividing by the maximum hourly heat input capacity of the emissions unit (79.6 MMBTU/hr). If required, compliance shall be based on conducting a stack test in accordance with either USEPA Reference Method 7 or 7A (as appropriate), of 40 CFR Part 60, Appendix A.
Emission Limitation -
0.14 lb NOx/MMBTU actual heat input when burning natural gas

Applicable Compliance Method -
Compliance shall be based upon multiplying the hourly gas burning capacity of the emissions unit (0.0796 MMCF/hr) by the AP-42 emission factor for natural gas (140 lb NOx/MMCF), and dividing by the maximum hourly heat input capcity of the emissions unit (79.6 MMBTU/hr). If required, compliance shall be based on conducting a stack test in accordance with either USEPA Reference Method 7 or 7A (as appropriate), of 40 CFR Part 60, Appendix A.
Emission Limitation -
48 TPY NOx

Applicable Compliance Method -
Compliance shall be determined by summing the nitrogen oxides emissions from the burning of No. 2 oil and natural gas in emissions units B001, B002 and B003. The nitrogen oxides emissions from No. 2 oil shall be determined by mulitplying the rolling, 12-month summation of the No. 2 oil usage by the AP-42 emission factor for No. 2 oil (20 lbs NOx/1000 gallons), and dividing by 2,000 pounds per ton. The nitrogen oxides 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 (140 lbs NOx/MMCF), and dividing by 2,000 pounds per ton. The nitrogen oxides emissions shall be summed for each rolling 12-month period.
Emission Limitation -
9.2 TPY SO2

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 SO2/1000 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 SO2/MMCF), and dividing by 2,000 pounds per ton. The sulfur dioxide emissions shall be summed for each rolling 12-month period.
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 terms and conditions in sections A, B, C, D, E and F of this permit are federally enforceable, pursuant to OAC rule 3745-35-07.

2. 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.