



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION
CUYAHOGA COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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P.O. Box 1049

Application No: 13-03610

DATE: 1/14/2003

Philips Medical Systems (Cleveland), Inc
David Hopka
595 Miner Road
Highland Heights, OH 44143

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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 within thirty (30) days after the notice of the Directors 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

Very truly yours,

Michael W. Ahern

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

CBAPC



**Permit To Install
Terms and Conditions**

**Issue Date: 1/14/2003
Effective Date: 1/14/2003**

FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 13-03610

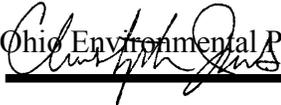
Application Number: 13-03610
APS Premise Number: 1318251604
Permit Fee: **\$0**
Name of Facility: Philips Medical Systems (Cleveland), Inc
Person to Contact: David Hopka
Address: 595 Miner Road
Highland Heights, OH 44143

Location of proposed air contaminant source(s) [emissions unit(s)]:
**595 Miner Road
Highland Heights, Ohio**

Description of proposed emissions unit(s):
Administrative modification to PTI for two cogenerators – P019 and P020.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. 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.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. 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 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.

5. 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 units 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 the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

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and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter

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3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only) TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	21.82
NOx	45.3
CO	41.7
OC	97.34

basis of air dispersion modeling for nitrogen dioxide.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain annual records of the amount of natural gas burned in this emissions unit.

D. Reporting Requirements

None

E. Testing Requirements

1. Emission testing shall be conducted 60 days after startup of the emissions unit.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate 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 necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

3. Compliance with the emission limitation(s) in section A of these terms and conditions shall be

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Facility ID: 1318251604

Emissions Unit ID: **P019**

determined in accord with the following method(s):

- a. Emission Limitation(s) -
5.17 lbs NOx/hr

Applicable Compliance Method -

The permittee shall demonstrate compliance with the hourly emission limitation by testing of the exhaust gases using methods 1-4 and method 7 or 7e of 40 CFR, Part 60, Appendix A.

Emission Limitation(s) -

22.65 TPY NO_x

Applicable Compliance Method -

The permittee shall demonstrate compliance multiplying 5.17 lbs NO_x/hr by 8760 hrs/yr and by 1/2000 ton/lb.

b. Emission Limitation(s) -

4.76 lbs CO/hr

Applicable Compliance Method -

Emission test shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 10B. No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04 (A).

Emission Limitation(s) -

20.85 TPY CO

Applicable Compliance Method -

The permittee shall demonstrate compliance multiplying 4.76 lbs CO/hr by 8760 hrs/yr and by 1/2000 ton/lb.

c. Emission Limitation(s) -

11.11 lbs OC/hr

Applicable Compliance Method -

Philip

PTI A

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Emissions Unit ID: **P019**

U.S. EPA Method 25 in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are 50 ppm or greater; or

U.S. EPA Method 25A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC

concentrations, if the VOC concentrations as carbon in the outlet are less than 50 ppm [to convert ppm into mass emissions pursuant to OAC rule 3745-21-07(C)(k)(7)]; and

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

Emission Limitation(s) -

48.67 TPY OC

Applicable Compliance Method -

The permittee shall demonstrate compliance multiplying 11.11 lbs OC/hr by 8760 hrs/yr and by 1/2000 ton/lb.

d. Emission Limitation(s) -

2.49 lb/hr PM

Compliance Method -

Multiply the emission factor 0.31 lb/MMft³ (from SCC 2-01-002-02) by the capacity rating 8.04 MMBtu/hr and divide by natural gas heat content of 911 Btu/ft³.

Emission limitation -

0.310 lb PM/MM BTU

Compliance Method -

Divide the emission factor 0.31 lb/MMft³ (from SCC 2-01-002-02) by the natural gas heat content of 911 Btu/ft³.

Emission Limitation(s) -

10.91 TPY PM

Applicable Compliance Method -

The permittee shall demonstrate compliance multiplying 2.49 lbs PM/hr by 8760 hrs/yr

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Philip

PTI A

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and by 1/2000 ton/lb.

Philip:

PTI A

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- e. Emission Limitation:

20% opacity as a six-minute average.

Compliance Method -

Compliance shall be determined through visible emission observations in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(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 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>
P020 - 820 kw, 8.04 MM BTU/hr, natural gas fired, engine driven, electric power generator with lean burn technology engine. Modified The terms in this permit supercede those identified in PTI 13-3610 issued on 12/8/99.	OAC rule 3745-31-05(A)(3)	5.17 lbs NOx/hr 22.65 TPY NOx 4.76 lbs CO/hr 20.85 TPY CO
		11.11 lbs OC/hr 48.67 TPY OC
		2.49 lb/hr PM 10.91 TPY PM
	OAC rule 3745-17-07 (A) (1)	Visible emissions limit; see II.A.2.a.
	OAC rule 3745-17-11 (B) (5) (a)	0.310 lb PM/MMBTU

2. Additional Terms and Conditions

- 2.a Visible particulate emissions from this stack shall not exceed twenty percent (20%) opacity as a six minute average, except that they may exceed twenty percent (20%) opacity, as a six minute average, for not more than six consecutive minutes in any sixty minute period, but they shall not exceed sixty percent (60%) opacity, as a six minute average, at any time.
- 2.b This emissions unit shall be limited to burning only natural gas.

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Emissions Unit ID: **P020**

B. Operational Restrictions

1. As a condition of this permit Phillips Medical Systems (Cleveland), Inc. is required to extend the height of its two stacks associated with generators P019 and P020 from 26 feet to 35 feet on the basis of air dispersion modeling for nitrogen dioxide.

Philip**PTI A****Modification Issued: 1/14/2003**Emissions Unit ID: **P020****C. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall maintain annual records of the amount of natural gas burned in this emissions unit.

D. Reporting Requirements

None

E. Testing Requirements

1. Emission testing shall be conducted 60 days after startup of the emissions unit.
2. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(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 Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate 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 necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

3. Compliance with the emission limitation(s) in section A of these terms and conditions shall be determined in accord with the following method(s):

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Philip

PTI A

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Emissions Unit ID: **P020**

a. Emission Limitation(s) -

5.17 lbs NOx/hr

Philip**PTI A****Modification Issued: 1/14/2003**Emissions Unit ID: **P020**

Applicable Compliance Method -

The permittee shall demonstrate compliance with the hourly emission limitation by testing of the exhaust gases using methods 1-4 and method 7 or 7e of 40 CFR, Part 60, Appendix A.

Emission Limitation(s) -

22.65 TPY NO_x

Applicable Compliance Method -

The permittee shall demonstrate compliance multiplying 5.17 lbs NO_x/hr by 8760 hrs/yr and by 1/2000 ton/lb.

b. Emission Limitation(s) -

4.76 lbs CO/hr

Applicable Compliance Method -

Emission test shall be performed in accordance with 40 CFR Part 60, Appendix A, Method 10B. No emission testing is specifically required to demonstrate compliance with this limit but, if appropriate, may be requested pursuant to OAC rule 3745-15-04 (A).

Emission Limitation(s) -

20.85 TPY CO

Applicable Compliance Method -

The permittee shall demonstrate compliance multiplying 4.76 lbs CO/hr by 8760 hrs/yr and by 1/2000 ton/lb.

c. Emission Limitation(s) -

11.11 lbs OC/hr

Applicable Compliance Method -

Philip**PTI A****Modification Issued: 1/14/2003**Emissions Unit ID: **P020**

U.S. EPA Method 25 in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are 50 ppm or greater; or

U.S. EPA Method 25A in 40 CFR Part 60, Appendix A, shall be used to determine the VOC concentrations, if the VOC concentrations as carbon in the outlet are less than 50 ppm [to convert ppm into mass emissions pursuant to OAC rule 3745-21-07(C)(k)(7)]; and

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

Emission Limitation(s) -

48.67 TPY OC

Applicable Compliance Method -

The permittee shall demonstrate compliance multiplying 11.11 lbs OC/hr by 8760 hrs/yr and by 1/2000 ton/lb.

d. Emission Limitation(s) -

2.49 lb/hr PM

Compliance Method -

Multiply the emission factor 0.31 lb/MMft³ (from SCC 2-01-002-02) by the capacity rating 8.04 MMBtu/hr and divide by natural gas heat content of 911 Btu/ft³.

Emission limitation -

0.310 lb PM/MM BTU

Compliance Method -

Divide the emission factor 0.31 lb/MMft³ (from SCC 2-01-002-02) by the natural gas heat content of 911 Btu/ft³.

Emission Limitation(s) -

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10.91TPY PM

Applicable Compliance Method -

The permittee shall demonstrate compliance multiplying 2.49 lbs PM/hr by 8760 hrs/yr and by 1/2000 ton/lb.

Philip:

PTI A

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Emissions Unit ID: **P020**

- e. Emission Limitation:

20% opacity as a six-minute average.

Compliance Method -

Compliance shall be determined through visible emission observations in accordance with 40 CFR Part 60, Appendix A, Method 9, and the procedures specified in OAC rule 3745-17-03(B)(1).

F. Miscellaneous Requirements

None