



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
CUYAHOGA COUNTY**

CERTIFIED MAIL

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

Application No: 13-04687

Fac ID: 1318452983

DATE: 1/2/2007

Parma Community General Hospital
Timothy Mosley
7007 Powers Boulevard
Parma, OH 44129

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43216-1049.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$800** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

CLAA

PA

Synthetic Minor Determination and/or Netting Determination

Permit To Install **ENTER PTI NUMBER HERE:** 13-04503

A. Source Description

The Parma Community General Hospital has submitted a permit to install two (2) 18.8 mmBtu/hr natural gas (No.2 fuel oil backup) boilers for space heating.

B. Facility Emissions and Attainment Status

This facility currently has the potential to emit uncontrolled SO₂ emissions in excess of 100 TPY which would result in Title V applicability. Cuyahoga County has attainment status for SO₂ emissions. The facility has shut down two of its existing sources, B005 and B006, and a third source, B004, will be shut down after the new sources are installed. The shutdown of these sources will decrease the facility's PTE of SO₂ emissions to 40.68 TPY. The facility then would not be subject to Title V permitting as the PTE for SO₂ emissions does not exceed 100 TPY.

C. Source Emissions

These new sources (B008 and B009) have the potential to emit 82.4 TPY of SO₂ emissions. The total PTE for the facility would increase to 123 TPY (40.68 tpy + 82.4 tpy) resulting in Title V applicability. However, the permit will be subject to a Federally Enforceable restriction on fuel usage in order to avoid Title V permitting. The allowable will be 24.5 TPY of SO₂ emissions, combined for sources B008 and B009. This results in a total facility PTE for SO₂ of 65.18 TPY (40.68 tpy + 24.5 tpy).

D. Conclusion

Limiting the No.2 fuel oil usage rate for emissions units B008 and B009 to the following:

B008- 350,000 gallons per rolling, 12-month period; and

B009- 350,000 gallons per rolling, 12-month period

will restrict the SO₂ emissions to 24.5 TPY and NO_x emissions to 7.0 TPY based on a rolling 12-month summation. With the shutdown of the third existing boiler, the total facility PTE for SO₂ will be 65.18 TPY. Therefore, the Parma Community General Hospital will not be subject to Title V permitting since the PTE for all other pollutants will each be less than 100 TPY.



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 13-04687

**Application Number: 13-04687
Facility ID: 1318452983
Permit Fee: To be entered upon final issuance
Name of Facility: Parma Community General Hospital
Person to Contact: Timothy Mosley
Address: 7007 Powers Boulevard
Parma, OH 44129**

Location of proposed air contaminant source(s) [emissions unit(s)]:
7007 Powers Boulevard
Parma, Ohio

Description of proposed emissions unit(s):
Two new 18.8 MMBTU/HR boilers, natural gas primary fuel with oil backup -- B008 and B009.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit 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 emissions unit(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 and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Laura Powell
Interim Director

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written

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reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the

permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. 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 or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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7. Fees

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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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

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8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of

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the Ohio EPA. Progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
- ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit-To-Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 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 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 ninety (90) days after commencing operation of the source(s) covered by this permit.

11. 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.

12. 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.

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13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

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B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 state-only required 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 (i.e., postmarked) quarterly, 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. 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.

4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of

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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.

5. Construction of New Sources(s)

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.

6. 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.

7. 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).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

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9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

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C. 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>
SO ₂	24.50
NO _x	7.00

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None.

Parm:
PTI A

Emissions Unit ID: B008

Issued: To be entered upon final issuance

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>	
B008 - 18.8 mmBtu/hr Natural Gas/No. 2 Fuel Oil Boiler	OAC rule 3745-31-05(A)(3)	OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-10(B)(1)	ORC 3704.03(T)(4)
	OAC rule 3745-18-06(D)	
	40 CFR Part 60 Subpart Dc	
	OAC rule 3745-21-07(B)	
	OAC rule 3745-21-08(B)	
	OAC rule 3745-23-06(B)	

Parm:
PTI A

Emissions Unit ID: B008

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Applicable Emissions
Limitations/Control
Measures

The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart Dc and OAC rule 3745-31-05(C).

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

0.020 pound of particulate emissions per million Btu of actual heat input.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60 Subpart Dc.

0.5 pound of SO₂ emissions per million Btu of actual heat input.

See term A.I.2.c.

See term A.I.2.d.

See term A.I.2.e.

Sulfur dioxide (SO₂) emissions shall not exceed 12.25 TPY as a rolling, 12-month summation.

Nitrogen oxide (NO_x) emissions shall not exceed 3.5 TPY as a rolling, 12-month summation (when burning fuel oil).
See term A.I.2.h below.

See term A.II.3 below.

See terms A.I.2.f and A.I.2.g below.

Parm:**PTI A**

Emissions Unit ID: B008

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas or No. 2 fuel oil, a sulfur content limitation for No. 2 fuel oil, and the emission limitations listed in term A.I.1 above.
- 2.b** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency (U.S. EPA), 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency (Ohio EPA).
- 2.c** The design of the emissions unit and the technology associated with the current operating practices satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-07(B).
- 2.d** The design of the emissions unit and the technology associated with the current operating practices satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. This rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.e** The design of the emissions unit and the technology associated with the current operating practices satisfy the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06.

On February 15, 2005, OAC rule 3745-23-06 was rescinded; therefore, this rule is no longer part of the State regulations. This rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the U.S. EPA approves the revision to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.f** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this emissions

Emissions Unit ID: B008

unit since the calculated annual emission rate for particulate emissions is less than ten tons per year taking into account the federally enforceable rule limit of 0.02 pound of particulates per million Btu of actual heat input under OAC rule 3745-17-10(B)(1).

- 2.g** The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled NOx, VOC and CO emissions from this emissions unit since the potential to emit for NOx (when burning only natural gas), VOC and CO are each less than ten tons per year.
- 2.h** Permit to Install 13-04687 for this emissions unit takes into account the restriction upon oil usage, as proposed by the permittee, for the purpose of avoiding the BAT requirements under OAC rule 3745-31-05(A)(3) for NOx.

II. Operational Restrictions

1. The permittee shall burn only natural gas and/or No. 2 fuel oil in this emissions unit.
2. The quality of No. 2 fuel oil received for burning in this emissions unit shall have a combination of sulfur content and heat content sufficient to comply with the allowable sulfur dioxide emission limitation of 0.50 lb/mmBtu of actual heat input and the sulfur content limitation for No. 2 fuel oil of less than or equal to 0.5 weight percent sulfur.
3. The maximum annual No. 2 fuel oil usage rate for this emissions unit shall not exceed 350,000 gallons per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the No. 2 fuel oil usage levels specified in the following table:

Month	Maximum Allowable Cumulative Usage (gallons)
1	52,500
1-2	105,000
1-3	157,500
1-4	210,000
1-5	262,500
1-6	315,000
1-7	350,000
1-8	350,000
1-9	350,000
1-10	350,000
1-11	350,000
1-12	350,000

Parm:**PTI A**

Emissions Unit ID: B008

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

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

- a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and 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 sulfur dioxide emission rate (in lb/mmBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)]. A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

- b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lb/mmBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)].

- c. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

2. The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each month.
3. The permittee shall maintain monthly records of the following information:
 - a. The total volume of natural gas (mmcf) burned in this emissions unit.
 - b. The total number of gallons of No. 2 fuel oil used in this emissions unit for each month.
 - c. Beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the gallons of No. 2 fuel oil used.

Records of fuel consumption for each boiler may be calculated using records of total facility fuel consumption and records of utilization (in hours of operation or pounds steam) for each emissions unit.

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative fuel oil usage rate for each calendar month.

IV. Reporting Requirements

1. Pursuant to the NSPS, the permittee is required to report the following information at the appropriate times (if the information has not already been reported):
 - a. construction date (no later than 30 days after such date);
 - b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
 - c. actual start-up date (within 15 days after such date); and,
 - d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to the Cleveland Division of Air Quality (Cleveland DAQ) and to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, Ohio 43216-3669

2. The permittee shall notify the Cleveland DAQ in writing of any fuel burned in this emissions unit other than natural gas or No. 2 fuel oil.

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3. The permittee shall notify the Cleveland DAQ in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation and/or sulfur content limitation based upon the record keeping requirements from term A.III.1 above.
4. The notifications identified in terms A.IV.2 and A.IV.3 shall include a copy of such record and shall be sent to the Cleveland DAQ within 45 days after the deviation occurs.
5. The permittee shall submit annual reports that specify the total SO₂ and NO_x emissions from this emissions unit during the previous calendar year. The reports shall be submitted by January 31 of each year.
6. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month No. 2 fuel oil usage limitation and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative No. 2 fuel oil usage limitations. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.

V. Testing Requirements

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation(s):
Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method(s):
Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A,
 - b. Emission Limitation(s):
0.50 lb/mmBtu, 12.25 TPY SO₂ emissions as a rolling, 12-month average.

Applicable Compliance Method:
The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-1 (9/98). Compliance with the lb/mmBtu emission limitation shall be based upon the record keeping in term A.III.1. Compliance with the annual emission

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limitation shall be determined by multiplying the monthly average lb SO₂/mmBtu value by the monthly average heat content, the monthly total gallons on No. 2 fuel oil burned, and then dividing by 2000 lbs/ton and shall be the sum of the monthly emission rates for any rolling, 12-month period.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 6.

- c. Emission Limitation(s):
0.020 lb of particulate emissions per mmBtu

Applicable Compliance Method:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-1 (9/98). Compliance with the lb/mmBtu emission limitation may be determined by converting the 2 lbs PE/10³ gal emission factor into lbs PE/mmBtu by dividing by 140 mmBtu/10³ gal.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5.

- d. Sulfur Content Limitation(s):
≤ 0.5 weight percent sulfur

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirement described in term A.III.1.

- e. Emission Limitation(s):
3.5 TPY of NO_x emissions as a rolling, 12-month average (when burning fuel oil).

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by multiplying the emission factor for NO_x (20 lb/1000 gallons of fuel oil burned) taken from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-1 (9/98) by the monthly total gallons on No. 2 fuel oil burned, and then dividing by 2000 lbs/ton and shall be the sum of the monthly emission rates for any rolling, 12-month period.

If required, the permittee shall demonstrate compliance with the emission

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limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 7.

VI. Miscellaneous Requirements

- The potential to emit for PE, CO, VOC and NOx emissions was determined as follows:

Natural gas as fuel:

PM/PM-10

Potential to Emit (PTE)

AP-42 Factor = 7.6 lbs PM/mmcf

$(18.8 \text{ mmBtu/hr}) * (7.6 \text{ lbs PM/mmcf}) * (\text{cf}/1050 \text{ Btu}) = 0.14 \text{ lb PM/hr}$

$(0.14 \text{ lb PM/hr}) * (8760\text{hrs/yr}) * (\text{ton}/2000 \text{ lbs}) = 0.61 \text{ TPY PM/PM-10}$

CO

Potential to Emit (PTE)

AP-42 Factor = 84 lbs CO/mmcf

$(18.8 \text{ mmBtu/hr}) * (84 \text{ lbs CO/mmcf}) * (\text{cf}/1050 \text{ Btu}) = 1.50 \text{ lbs CO/hr}$

$(1.50 \text{ lbs CO/hr}) * (8760\text{hrs/yr}) * (\text{ton}/2000 \text{ lbs}) = 6.58 \text{ TPY CO}$

VOC

Potential to Emit (PTE)

AP-42 Factor = 11 lb/mmcf

$(18.8 \text{ mmBtu/hr}) * (11 \text{ lb/mmcf}) * (\text{cf}/1050 \text{ Btu}) = 0.19 \text{ lb VOC/hr}$

$(0.19 \text{ lb VOC/hr}) * (8760\text{hrs/yr}) * (\text{ton}/2000 \text{ lbs}) = 0.83 \text{ TPY VOC}$

NOx

Potential to Emit (PTE)

AP-42 Factor = 100 lbs NOx/mmcf

$(18.8 \text{ mmBtu/hr}) * (100 \text{ lbs NOx/mmcf}) * (\text{cf}/1050 \text{ Btu}) = 1.88 \text{ lb NOx/hr}$

$(1.88 \text{ lb NOx/hr}) * (8760\text{hrs/yr}) * (\text{ton}/2000 \text{ lbs}) = 8.23 \text{ TPY NOx}$

No.2 oil as fuel:

PM/PM-10

Potential to Emit (PTE)

AP-42 Factor = 2 lbs PM/1000 gal

$(2 \text{ lbs PM}/1000 \text{ gal}) * (1000 \text{ gals}/140 \text{ mmBtu}) = 0.014 \text{ lb PM/mmBtu}$

$(18.8 \text{ mmBtu/hr}) * (0.014 \text{ lb PM/mmBtu}) = 0.26 \text{ lb PM/hr}$

$(0.26 \text{ lb PM/hr}) * (8760\text{hrs/yr}) * (\text{ton}/2000 \text{ lbs}) = 1.14 \text{ TPY PM}$

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CO

Potential to Emit (PTE)*AP-42 Factor = 5 lbs CO/1000 gal* $(5 \text{ lbs CO}/1000 \text{ gal}) * (1000 \text{ gals}/140 \text{ mmBtu}) = 0.036 \text{ lb CO}/\text{mmBtu}$ $(18.8 \text{ mmBtu}/\text{hr}) * (0.036 \text{ lb CO}/\text{mmBtu}) = 0.68 \text{ lb CO}/\text{hr}$ $(0.68 \text{ lb CO}/\text{hr}) * (8760 \text{ hrs}/\text{yr}) * (\text{ton}/2000 \text{ lbs}) = 2.98 \text{ TPY CO}$

VOC

Potential to Emit (PTE)*AP-42 Factor = 0.252 lb VOC/1000 gal* $(0.252 \text{ lb VOC}/1000 \text{ gal}) * (1000 \text{ gals}/140 \text{ mmBtu}) = 0.0018 \text{ lb VOC}/\text{mmBtu}$ $(18.8 \text{ mmBtu}/\text{hr}) * (0.0018 \text{ lb}/\text{mmBtu}) = 0.033 \text{ lb VOC}/\text{hr}$ $(0.033 \text{ lb VOC}/\text{hr}) * (8760 \text{ hrs}/\text{yr}) * (\text{ton}/2000 \text{ lbs}) = 0.14 \text{ TPY VOC}$

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B. State Only Enforceable Section

I. 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>
B008 - 18.8 mmBtu/hr Natural Gas/No. 2 Fuel Oil Boiler	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>	
B009 - 18.8 mmBtu/hr Natural Gas/No. 2 Fuel Oil Boiler	OAC rule 3745-31-05(A)(3)	OAC rule 3745-31-05(C) Synthetic Minor to avoid Title V
	OAC rule 3745-17-07(A)(1)	
		ORC 3704.03(T)(4)
	OAC rule 3745-17-10(B)(1)	
	OAC rule 3745-18-06(D)	
	40 CFR Part 60 Subpart Dc	
	OAC rule 3745-21-07(B)	
	OAC rule 3745-21-08(B)	
	OAC rule 3745-23-06(B)	

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<p>Applicable Emissions <u>Limitations/Control</u> <u>Measures</u></p>	<p>12.25 TPY as a rolling, 12-month summation.</p>
<p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart Dc and OAC rule 3745-31-05(C).</p>	<p>Nitrogen oxide (NO_x) emissions shall not exceed 3.5 TPY as a rolling, 12-month summation (when burning fuel oil). See term A.I.2.h below. See term A.II.3 below.</p>
<p>Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.</p>	<p>See terms A.I.2.f and A.I.2.g below.</p>
<p>0.020 pound of particulate emissions per million Btu of actual heat input.</p>	
<p>The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60 Subpart Dc.</p>	
<p>0.5 pound of SO₂ emissions per million Btu of actual heat input.</p>	
<p>See term A.I.2.c.</p>	
<p>See term A.I.2.d.</p>	
<p>See term A.I.2.e.</p>	
<p>Sulfur dioxide (SO₂) emissions shall not exceed</p>	

2. Additional Terms and Conditions

- 2.a Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas or No. 2 fuel oil, a sulfur content limitation for No. 2 fuel oil, and the emission limitations listed in term A.I.1 above.
- 2.b The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency (U.S. EPA), 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency (Ohio EPA).
- 2.c The design of the emissions unit and the technology associated with the current operating practices satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-07(B).
- 2.d The design of the emissions unit and the technology associated with the current operating practices satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. This rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.e The design of the emissions unit and the technology associated with the current operating practices satisfy the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06.

On February 15, 2005, OAC rule 3745-23-06 was rescinded; therefore, this rule is no longer part of the State regulations. This rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Until the U.S. EPA approves the revision to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.f The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) does not apply to the particulate emissions from this emissions unit since the calculated annual emission rate for particulate emissions is less than ten tons per year taking into account the federally enforceable rule limit of 0.02 pound of particulates per million Btu of actual heat input under OAC rule

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3745-17-10(B)(1).

- 2.g** The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled NO_x, VOC and CO emissions from this emissions unit since the potential to emit for NO_x (when burning only natural gas), VOC and CO are each less than ten tons per year.
- 2.h** Permit to Install 13-04687 for this emissions unit takes into account the restriction upon oil usage, as proposed by the permittee, for the purpose of avoiding the BAT requirements under OAC rule 3745-31-05(A)(3) for NO_x.

II. Operational Restrictions

- The permittee shall burn only natural gas and/or No. 2 fuel oil in this emissions unit.
- The quality of No. 2 fuel oil received for burning in this emissions unit shall have a combination of sulfur content and heat content sufficient to comply with the allowable sulfur dioxide emission limitation of 0.50 lb/mmBtu of actual heat input and the sulfur content limitation for No. 2 fuel oil of less than or equal to 0.5 weight per cent sulfur.
- The maximum annual No. 2 fuel oil usage rate for this emissions unit shall not exceed 350,000 gallons per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the No. 2 fuel oil usage levels specified in the following table:

Month	Maximum Allowable Cumulative Usage (gallons)
1	52,500
1-2	105,000
1-3	157,500
1-4	210,000
1-5	262,500
1-6	315,000
1-7	350,000
1-8	350,000
1-9	350,000
1-10	350,000
1-11	350,000

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1-12	350,000
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After the first 12 calendar months of operation, compliance with the annual No. 2 fuel oil usage limitation shall be based upon a rolling, 12-month summation of the usage rates.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

- a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and 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 sulfur dioxide emission rate (in lb/mmBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)]. A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

- b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lb/mmBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)].

- c. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

2. The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each month.

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3. The permittee shall maintain monthly records of the following information:
 - a. The total volume of natural gas (mmcf) burned in this emissions unit.
 - b. The total number of gallons of No. 2 fuel oil used in this emissions unit for each month.
 - c. Beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the gallons of No. 2 fuel oil used.

Records of fuel consumption for each boiler may be calculated using records of total facility fuel consumption and records of utilization (in hours of operation or pounds steam) for each emissions unit.

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative production rate for each calendar month.

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IV. Reporting Requirements

1. Pursuant to the NSPS, the permittee is required to report the following information at the appropriate times (if the information has not already been reported):
 - a. construction date (no later than 30 days after such date);
 - b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
 - c. actual start-up date (within 15 days after such date); and,
 - d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to the Cleveland Division of Air Quality (Cleveland DAQ) and to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, Ohio 43216-3669

2. The permittee shall notify the Cleveland DAQ in writing of any fuel burned in this emissions unit other than natural gas or No. 2 fuel oil.
3. The permittee shall notify the Cleveland DAQ in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation and/or sulfur content limitation based upon the record keeping requirements from term A.III.1 above.
4. The notifications identified in terms A.IV.2 and A.IV.3 shall include a copy of such record and shall be sent to the Cleveland DAQ within 45 days after the deviation occurs.
5. The permittee shall submit annual reports that specify the total SO₂ and NO_x emissions from this emissions unit during the previous calendar year. The reports shall be submitted by January 31 of each year.
6. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month No. 2 fuel oil usage limitation and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative No. 2 fuel oil usage limitations. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under Section A.

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Issued: To be entered upon final issuance**V. Testing Requirements**

1. Compliance with the emission limitations in Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation(s):

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method(s):

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A, .

- b. Emission Limitation(s):

0.50 lb/mmBtu, 12.25 TPY SO₂ emissions

Applicable Compliance Method:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-1 (9/98). Compliance with the lb/mmBtu emission limitation shall be based upon the record keeping in term A.III.1. Compliance with the annual emission limitation shall be determined by multiplying the annual average lb SO₂/mmBtu value by the annual average heat content and the total gallons on No. 2 fuel oil burned, and then dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 6.

- c. Emission Limitation(s):

0.020 lb of particulate emissions per mmBtu

Applicable Compliance Method:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-1 (9/98). Compliance with the lb/mmBtu emission limitation may be determined by converting the 2 lbs PE/10³ gal emission factor into lbs PE/mmBtu by dividing by 140 mmBtu/10³ gal.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR

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Part 60, Appendix A,
Methods 1- 5.

- d. Sulfur Content Limitation(s):
 ≤ 0.5 weight percent sulfur

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirement described in paragraph A.III.1.

- e. Emission Limitation(s):
3.5 TPY of NO_x emissions as a rolling, 12-month average (when burning fuel oil).

Applicable Compliance Method:

Compliance with the annual emission limitation shall be determined by multiplying the emission factor for NO_x (20 lb/1000 gallons of fuel oil burned) taken from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-1 (9/98) by the monthly total gallons of No. 2 fuel oil burned, and then dividing by 2000 lbs/ton and shall be the sum of the monthly emission rates for any rolling, 12-month period.

If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 7.

VI. Miscellaneous Requirements

1. The potential to emit for PE, CO, VOC, and NO_x emissions was determined as follows:

Natural gas as fuel:

PM/PM-10

Potential to Emit (PTE)

AP-42 Factor = 7.6 lbs PM/mmcf

$(18.8 \text{ mmBtu/hr}) * (7.6 \text{ lbs PM/mmcf}) * (\text{cf}/1050 \text{ Btu}) = 0.14 \text{ lb PM/hr}$

$(0.14 \text{ lb PM/hr}) * (8760 \text{ hrs/yr}) * (\text{ton}/2000 \text{ lbs}) = 0.61 \text{ TPY PM/PM-10}$

CO

Potential to Emit (PTE)

AP-42 Factor = 84 lbs CO/mmcf

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$$(18.8 \text{ mmBtu/hr}) * (84 \text{ lbs CO/mmcf}) * (\text{cf}/1050 \text{ Btu}) = 1.50 \text{ lbs CO/hr}$$

$$(1.50 \text{ lbs CO/hr}) * (8760\text{hrs/yr}) * (\text{ton}/2000 \text{ lbs}) = 6.58 \text{ TPY CO}$$

VOC

Potential to Emit (PTE)*AP-42 Factor = 11 lb/mmcf*

$$(18.8 \text{ mmBtu/hr}) * (11 \text{ lb/mmcf}) * (\text{cf}/1050 \text{ Btu}) = 0.19 \text{ lb VOC/hr}$$

$$(0.19 \text{ lb VOC/hr}) * (8760\text{hrs/yr}) * (\text{ton}/2000 \text{ lbs}) = 0.83 \text{ TPY VOC}$$

NOx

Potential to Emit (PTE)*AP-42 Factor = 100 lbs NOx/mmcf*

$$(18.8 \text{ mmBtu/hr}) * (100 \text{ lbs NOx/mmcf}) * (\text{cf}/1050 \text{ Btu}) = 1.88 \text{ lb NOx/hr}$$

$$(1.88 \text{ lb NOx/hr}) * (8760\text{hrs/yr}) * (\text{ton}/2000 \text{ lbs}) = 8.23 \text{ TPY NOx}$$

No. 2 oil as fuel:

PM/PM-10

Potential to Emit (PTE)*AP-42 Factor = 2 lbs PM/1000 gal*

$$(2 \text{ lbs PM}/1000 \text{ gal}) * (1000 \text{ gals}/140 \text{ mmBtu}) = 0.014 \text{ lb PM/mmBtu}$$

$$(18.8 \text{ mmBtu/hr}) * (0.014 \text{ lb PM/mmBtu}) = 0.26 \text{ lb PM/hr}$$

$$(0.26 \text{ lb PM/hr}) * (8760\text{hrs/yr}) * (\text{ton}/2000 \text{ lbs}) = 1.14 \text{ TPY PM}$$

CO

Potential to Emit (PTE)*AP-42 Factor = 5 lbs CO/1000 gal*

$$(5 \text{ lbs CO}/1000 \text{ gal}) * (1000 \text{ gals}/140 \text{ mmBtu}) = 0.036 \text{ lb CO/mmBtu}$$

$$(18.8 \text{ mmBtu/hr}) * (0.036 \text{ lb CO/mmBtu}) = 0.68 \text{ lb CO/hr}$$

$$(0.68 \text{ lb CO/hr}) * (8760\text{hrs/yr}) * (\text{ton}/2000 \text{ lbs}) = 2.98 \text{ TPY CO}$$

VOC

Potential to Emit (PTE)*AP-42 Factor = 0.252 lb VOC/1000 gal*

$$(0.252 \text{ lb VOC}/1000 \text{ gal}) * (1000 \text{ gals}/140 \text{ mmBtu}) = 0.0018 \text{ lb VOC/mmBtu}$$

$$(18.8 \text{ mmBtu/hr}) * (0.0018 \text{ lb/mmBtu}) = 0.033 \text{ lb VOC/hr}$$

$$(0.033 \text{ lb VOC/hr}) * (8760\text{hrs/yr}) * (\text{ton}/2000 \text{ lbs}) = 0.14 \text{ TPY VOC}$$

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B. State Only Enforceable Section**I. 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>
B009 - 18.8 mmBtu/hr Natural Gas/No. 2 Fuel Oil Boiler	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None