



9/26/2014

Mr. Jim Franz
Sisters of Charity
5900 Delhi Road
Mt. St. Joseph, OH 45051

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1431131566
Permit Number: P0117588
Permit Type: Renewal
County: Hamilton

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- How to appeal this permit
• How to save money, reduce pollution and reduce energy consumption
• How to give us feedback on your permitting experience
• How to get an electronic copy of your permit

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

Certified Mail

Table with 2 columns: Yes/No, and various permit conditions like TOXIC REVIEW, SYNTHETIC MINOR TO AVOID MAJOR NSR, CEMS, MACT/GACT, NSPS, NESHAPS, NETTING, MODELING SUBMITTED, SYNTHETIC MINOR TO AVOID TITLE V, FEDERALLY ENFORCABLE PTIO (FEPTIO), SYNTHETIC MINOR TO AVOID MAJOR GHG.

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/survey.aspx](http://www.epa.ohio.gov/survey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Erica R. Engel-Ishida, Interim Manager  
Permit Issuance and Data Management Section, DAPC

Cc: SWOAQA



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Sisters of Charity**

Facility ID:	1431131566
Permit Number:	P0117588
Permit Type:	Renewal
Issued:	9/26/2014
Effective:	9/26/2014
Expiration:	9/26/2024





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
Sisters of Charity

**Table of Contents**

Authorization .....	1
A. Standard Terms and Conditions .....	3
1. What does this permit-to-install and operate ("PTIO") allow me to do?.....	4
2. Who is responsible for complying with this permit? .....	4
3. What records must I keep under this permit? .....	4
4. What are my permit fees and when do I pay them?.....	4
5. When does my PTIO expire, and when do I need to submit my renewal application? .....	4
6. What happens to this permit if my project is delayed or I do not install or modify my source? .....	5
7. What reports must I submit under this permit? .....	5
8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit? .....	5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? ...	5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? .....	6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? .....	6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? .....	6
13. Can I transfer this permit to a new owner or operator?.....	7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? .....	7
15. What happens if a portion of this permit is determined to be invalid? .....	7
B. Facility-Wide Terms and Conditions.....	8
C. Emissions Unit Terms and Conditions .....	10
1. B004, Fluid Heater #1 .....	11
2. B006, Fluid Heater #3 .....	20





**Final Permit-to-Install and Operate**  
Sisters of Charity  
**Permit Number:** P0117588  
**Facility ID:** 1431131566  
**Effective Date:** 9/26/2014

## Authorization

Facility ID: 1431131566  
Application Number(s): A0051721  
Permit Number: P0117588  
Permit Description: PTIO renewal for two 20.9 mmBtu/hr gas/oil-fired boilers (B004 and B006) which are transitioning to NTV status due to the permanent shutdown of two other boilers (B005 and B007) and the resulting lowering of the facility-wide PTE.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 9/26/2014  
Effective Date: 9/26/2014  
Expiration Date: 9/26/2024  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Sisters of Charity  
5900 Delhi Rd  
Cincinnati, OH 45051

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

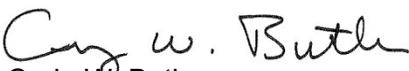
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Southwest Ohio Air Quality Agency  
250 William Howard Taft Rd.  
Cincinnati, OH 45219  
(513)946-7777

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section 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 described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

  
Craig W. Butler  
Director



**Final Permit-to-Install and Operate**

Sisters of Charity

**Permit Number:** P0117588

**Facility ID:** 1431131566

**Effective Date:** 9/26/2014

## Authorization (continued)

Permit Number: P0117588

Permit Description: PTIO renewal for two 20.9 mmBtu/hr gas/oil-fired boilers (B004 and B006) which are transitioning to NTV status due to the permanent shutdown of two other boilers (B005 and B007) and the resulting lowering of the facility-wide PTE.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

<b>Emissions Unit ID:</b>	<b>B004</b>
Company Equipment ID:	Fluid Heater #1
Superseded Permit Number:	P0099259
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B006</b>
Company Equipment ID:	Fluid Heater #3
Superseded Permit Number:	P0104485
General Permit Category and Type:	Not Applicable



**Final Permit-to-Install and Operate**

Sisters of Charity

**Permit Number:** P0117588

**Facility ID:** 1431131566

**Effective Date:** 9/26/2014

## **A. Standard Terms and Conditions**



**1. What does this permit-to-install and operate ("PTIO") allow me to do?**

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

**2. Who is responsible for complying with this permit?**

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

**3. What records must I keep under this permit?**

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

**4. What are my permit fees and when do I pay them?**

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

**5. When does my PTIO expire, and when do I need to submit my renewal application?**

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

**6. What happens to this permit if my project is delayed or I do not install or modify my source?**

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

**7. What reports must I submit under this permit?**

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

**8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?**

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

**9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?**

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



**10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?**

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

**11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?**

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

**12. What happens if one or more emissions units operated under this permit is/are shut down permanently?**

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



**13. Can I transfer this permit to a new owner or operator?**

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

**14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?**

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

**15. What happens if a portion of this permit is determined to be invalid?**

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



**Final Permit-to-Install and Operate**  
Sisters of Charity  
**Permit Number:** P0117588  
**Facility ID:** 1431131566  
**Effective Date:** 9/26/2014

## **B. Facility-Wide Terms and Conditions**



**Final Permit-to-Install and Operate**

Sisters of Charity

**Permit Number:** P0117588

**Facility ID:** 1431131566

**Effective Date:** 9/26/2014

1. 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).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) None.
2. The permittee is advised that this facility may be subject to the "Generally Available Control Technology" (GACT) requirements under 40 CFR Part 63 Subpart JJJJJJ (National Emission Standards for Area Sources: Industrial, Commercial and Institutional Boilers). The U.S. EPA is responsible for the administration of the requirements of this rule at this time. It should be noted that the enforcement authority of the GACT requirements have not been delegated to Ohio EPA at the time of this permit processing. The complete requirements of this rule (including the Part 63 General Provisions) may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District Office or local air agency.



**Final Permit-to-Install and Operate**

Sisters of Charity

**Permit Number:** P0117588

**Facility ID:** 1431131566

**Effective Date:** 9/26/2014

## **C. Emissions Unit Terms and Conditions**



**1. B004, Fluid Heater #1**

**Operations, Property and/or Equipment Description:**

20.9 MMBtu/hr gas/oil fired steam generator with low-NOx burners

a) 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.

b) **Applicable Emissions Limitations and/or Control Requirements**

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Emissions from the combustion of Natural Gas:  Particulate emissions (PE) shall not exceed 0.0075 lb/mmBtu.  Particulate matter 10 microns and less in diameter (PM10) shall not exceed 0.0075 lb/mmBtu.  Sulfur dioxide (SO2) emissions shall not exceed 0.0006 lb/mmBtu.  Nitrogen oxides (NO <sub>x</sub> ) emissions shall not exceed 0.05 lb/mmBtu.  Carbon monoxide (CO) emissions shall not exceed 0.082 lb/mmBtu.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Volatile Organic compound (VOC) emissions shall not exceed 0.005 lb/mmBtu.</p> <p>Emissions from the burning of No. 2 Fuel Oil:</p> <p>Particulate emissions (PE) shall not exceed 0.014 lb/mmBtu.</p> <p>Particulate matter 10 microns and less in diameter (PM10) emissions shall not exceed 0.014 lb/mmBtu.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.30 lb/mmBtu.</p> <p>Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 0.14 lb/mmBtu.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.036 lb/mmBtu.</p> <p>Organic compound (OC) emissions shall not exceed 0.004 lb/mmBtu.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(F).</p> <p>See b)(2)c., c)(1) and c)(2).</p>
b.	OAC rule 3745-31-05(F)	<p>PE emissions shall not exceed 0.74 tons per year (TPY).</p> <p>PM10 emissions shall not exceed 0.74 TPY.</p> <p>SO<sub>2</sub> emissions shall not exceed 2.44 TPY.</p> <p>NO<sub>x</sub> emissions shall not exceed 5.25 TPY.</p> <p>CO emissions shall not exceed 7.51 TPY.</p> <p>VOC emissions shall not exceed 0.46 TPY.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	40 CFR Part 60, Subpart Dc.	The SO <sub>2</sub> emission limitation specified by this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).  See b)(2)c. and d)(1).
d.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
e.	OAC rule 3745-17-10(C)(1)	The emission limitation specified by this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
f.	OAC rule 3745-18-06(D)	The emission limitation specified by this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas as the primary fuel and the use of low NO<sub>x</sub> burners, with No. 2 fuel oil as a backup fuel with usage restrictions.
- 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).
- c. Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except for one 6-minute period per hour of not more than 27% opacity.

c) Operational Restrictions

- (1) The sulfur content of the No. 2 fuel oil employed in this emissions unit shall not exceed 0.3% by weight.
- (2) The No. 2 fuel oil usage for this emissions unit shall not exceed 112,340 gallons per year.



d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall record and maintain monthly records for this emissions unit which list the total amount of No. 2 fuel oil employed, in gallons.

These records shall be maintained for a period of not less than five years.

- (2) 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 lbs/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, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries 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 lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

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 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.



e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods using emission factors from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Tables 1.3-1 and 1.3-3 (05/10) and Section 1.4, Tables 1.4-1 and 1.4-2 (7/98):

a. Emission Limitations:

When burning natural gas, PE/PM<sub>10</sub> emissions shall not exceed 0.0075 lb/mmBtu of actual heat input.

When burning No. 2 fuel oil, PE/PM<sub>10</sub> emissions shall not exceed 0.014 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance with the lb/mmBtu emission limitations when burning natural gas may be determined by converting the 7.6 lbs PE/PM<sub>10</sub>/10<sup>6</sup>scf emission factor into lb PE/PM<sub>10</sub>/mmBtu by dividing by 1,020 Btu/scf. Compliance with the lb/mmBtu emission limitations when burning No. 2 fuel oil may be determined by converting the 2 lbs PE/PM<sub>10</sub>/10<sup>3</sup> gal emission factor into lbs PE/PM<sub>10</sub>/mmBtu by dividing by 140 mmBtu/10<sup>3</sup> gal.

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

If required, the permittee shall demonstrate compliance with the PM<sub>10</sub> lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 51, Appendix M, Method 201.

b. Emission Limitations:

When burning natural gas, SO<sub>2</sub> emissions shall not exceed 0.0006 lb/mmBtu.

When burning No. 2 fuel oil, SO<sub>2</sub> emissions shall not exceed 0.3 lb/mmBtu.



Applicable Compliance Method:

Compliance with the lb/mmBtu emission limitation when burning natural gas may be determined by converting the 0.6 lbs SO<sub>2</sub>/10<sup>6</sup>scf emission factor into lb SO<sub>2</sub>/mmBtu by dividing by 1,020 Btu/scf. Compliance with the lb/mmBtu emission limitation when burning No. fuel oil may be determined by converting the 42.6 lbs SO<sub>2</sub>/10<sup>3</sup> gal emission factor into lbs SO<sub>2</sub>/mmBtu by dividing by 140 mmBtu/10<sup>3</sup> 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- 4, and 6.

c. Emission Limitations:

When burning natural gas, NO<sub>x</sub> emissions shall not exceed 0.05 lb/mmBtu.

When burning No. 2 fuel oil, NO<sub>x</sub> emissions shall not exceed 0.14 lb/mmBtu.

Applicable Compliance Method:

Compliance with the lb/mmBtu emission limitation when burning natural gas may be determined by converting the 50 lbsNO<sub>x</sub>/10<sup>6</sup>scf emission factor into lbNO<sub>x</sub>/mmBtu by dividing by 1,020 Btu/scf. Compliance with the lb/mmBtu emission limitation when burning No. fuel oil may be determined by converting the 20 lbsNO<sub>x</sub> /10<sup>3</sup> gal emission factor into lbsNO<sub>x</sub> /mmBtu by dividing by 140 mmBtu/10<sup>3</sup> 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- 4, and 7.

d. Emission Limitations:

When burning natural gas, CO emissions shall not exceed 0.082 lb/mmBtu.

When burning No. 2 fuel oil, CO emissions shall not exceed 0.036 lb/mmBtu.

Applicable Compliance Method:

Compliance with the lb/mmBtu emission limitation when burning natural gas may be determined by converting the 84 lbs CO/10<sup>6</sup>scf emission factor into lb CO/mmBtu by dividing by 1,020 Btu/scf. Compliance with the lb/mmBtu emission limitation when burning No. 2 fuel oil may be determined by converting the 5.0 lbs CO/10<sup>3</sup> gal emission factor into lbs CO/mmBtu by dividing by 140mmBtu/10<sup>3</sup> 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- 4, and 10.



e. Emission Limitations:

When burning natural gas, volatile organic compound (VOC) emissions shall not exceed 0.005 lb/mmBtu.

When burning No. 2 fuel oil, volatile organic compound (VOC) emissions shall not exceed 0.004 lb/mmBtu.

Applicable Compliance Method:

Compliance with the lb/mmBtu emission limitation when burning natural gas may be determined by converting the 5.5 lbs OC/10<sup>6</sup>scf emission factor into lb OC/mmBtu by dividing by 1,020 Btu/scf. Compliance with the lb/mmBtu emission limitation when burning No. 2 fuel oil may be determined by converting the 0.556 lbs OC/10<sup>3</sup> gal emission factor into lbs OC/mmBtu by dividing by 140 mmBtu/10<sup>3</sup> 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- 4, and 25.

(2) Emission Limitations:

PE emissions shall not exceed 0.74 TPY.

PM10 emissions shall not exceed 0.74 TPY.

Applicable Compliance Method:

The annual emissions limitation was calculated using the following equations:

$0.0075 \text{ lb of PE/PM10/mmBtu} \times 20.9 \text{ mmBtu/hr} \times 8059^* \text{ hours/year} \times \text{ton}/2000 \text{ lbs} = 0.63 \text{ TPY PE/PM10 from natural gas.}$

$2 \text{ lbs of PE/PM10}/1000 \text{ gallons of No. 2 fuel oil} \times 112,340 \text{ gallons No. 2 fuel oil/year} \times \text{ton}/2000 \text{ lbs} = 0.11 \text{ TPY of PE from No. 2 fuel oil.}$

$0.63 \text{ TPY PE/PM10 from natural gas} + 0.11 \text{ TPY of PE/PM10 from No. 2 fuel oil} = 0.74 \text{ TPY PE.}$

\* the emissions unit runs natural gas 92% of the time = 8059 hours.

(3) Emission Limitations:

SO2 emissions shall not exceed 2.44 TPY.

Applicable Compliance Method:

The annual emissions limitation was calculated using the following equations:

$0.0006 \text{ lb of SO2/mmBtu} \times 20.9 \text{ mmBtu/hr} \times 8059^* \text{ hours/year} \times \text{ton}/2000 \text{ lbs} = 0.05 \text{ TPY SO2 from natural gas.}$



42.6 lbs of SO<sub>2</sub>/1000 gallons of Number 2 fuel oil x 112,340 gallons No. 2 fuel oil/year x ton/2000 lbs = 2.39 TPY of SO<sub>2</sub> from No. 2 fuel oil.

0.05 TPY SO<sub>2</sub> from natural gas + 2.39 TPY of SO<sub>2</sub> from number 2 fuel oil = 2.44 TPY SO<sub>2</sub>.

\* the emissions unit runs natural gas 92% of the time = 8059 hours.

(4) Emission Limitation:

NO<sub>x</sub> emissions shall not exceed 5.25 TPY.

Applicable Compliance Method:

The annual emissions limitation was calculated using the following equations:

0.05 lb of NO<sub>x</sub>/mmBtu x 20.9 mmBtu/hr x 8059\* hours/year x ton/2000 lbs = 4.13 TPY SO<sub>2</sub> from natural gas.

20 lbs of NO<sub>x</sub>/1000 gallons of No. 2 fuel oil x 112,340 gallons No. 2 fuel oil/year x ton/2000 lbs = 1.12 TPY of NO<sub>x</sub> from No. 2 fuel oil.

4.13 TPY NO<sub>x</sub> from natural gas + 1.12 TPY of NO<sub>x</sub> from No. 2 fuel oil = 5.25 TPY NO<sub>x</sub>.

\* the emission unit runs natural gas 92% of the time = 8059 hours.

(5) Emission Limitation:

CO emissions shall not exceed 7.51 TPY.

Applicable Compliance Method:

The annual emissions limitation was calculated using the following equation:

0.082 lb of CO/mmBtu x 20.9 mmBtu/hr x 8760\* hours/year x ton/2000 lbs = 7.51 TPY SO<sub>2</sub> from natural gas.

\* Since the natural gas emission factor for CO was greater than the No. 2 fuel oil emission factor for CO, this emission limitation was calculated using the worst case emission factor from natural gas at 8760 hours.

(6) Emission Limitation:

VOC emissions shall not exceed 0.46 TPY.

Applicable Compliance Method:

The annual emissions limitation was calculated using the following equation:

0.005 lb of VOC/mmBtu x 20.9 mmBtu/hr x 8760\* hours/year x ton/2000 lbs = 0.46 TPY VOC from natural gas.



\* Since the natural gas emission factor for VOC was greater than the No. 2 fuel oil emission factor for VOC, this emission limitation was calculated using the worst case emission factor from natural gas at 8760 hours.

(7) Fuel Usage Limitation:

The No. 2 fuel oil usage for this emissions unit shall not exceed 112,340 gallons/year.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirement described in paragraph d)(1).

(8) Sulfur Content Limitation(s):

The sulfur content of the No. 2 fuel oil employed in this emissions unit shall not exceed 0.3% by weight.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirement described in paragraph d)(2).

(9) Visible Particulate Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.



**2. B006, Fluid Heater #3**

**Operations, Property and/or Equipment Description:**

20.9 MMBtu/hr gas/oil fired steam generator with low-NOx burners

a) 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.

b) **Applicable Emissions Limitations and/or Control Requirements**

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Emissions from the combustion of Natural Gas:  Particulate emissions (PE) shall not exceed 0.0075 lb/mmBtu.  Particulate matter 10 microns and less in diameter (PM10) shall not exceed 0.0075 lb/mmBtu.  Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.0006 lb/mmBtu.  Nitrogen oxides (NO <sub>x</sub> ) emissions shall not exceed 0.05 lb/mmBtu.  Carbon monoxide (CO) emissions shall not exceed 0.082 lb/mmBtu.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Volatile Organic compound (VOC) emissions shall not exceed 0.005 lb/mmBtu.</p> <p>Emissions from the burning of No. 2 Fuel Oil:</p> <p>Particulate emissions (PE) shall not exceed 0.014 lb/mmBtu.</p> <p>Particulate matter 10 microns and less in diameter (PM10) emissions shall not exceed 0.014 lb/mmBtu.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.30 lb/mmBtu.</p> <p>Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 0.14 lb/mmBtu.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.036 lb/mmBtu.</p> <p>Organic compound (OC) emissions shall not exceed 0.004 lb/mmBtu.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(F).</p> <p>See b)(2)c., c)(1) and c)(2).</p>
b.	OAC rule 3745-31-05(F)	<p>PE emissions shall not exceed 0.74 tons per year (TPY).</p> <p>PM10 emissions shall not exceed 0.74 TPY.</p> <p>SO<sub>2</sub> emissions shall not exceed 2.44 TPY.</p> <p>NO<sub>x</sub> emissions shall not exceed 5.25 TPY.</p> <p>CO emissions shall not exceed 7.51 TPY.</p> <p>VOC emissions shall not exceed 0.46 TPY.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	40 CFR Part 60, Subpart Dc.	The SO <sub>2</sub> emission limitation specified by this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).  See b)(2)c. and d)(1).
d.	OAC rule 3745-17-07(A)	The emission limitation specified by this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
e.	OAC rule 3745-17-10(C)(1)	The emission limitation specified by this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.
f.	OAC rule 3745-18-06(D)	The emission limitation specified by this rule is less stringent than the limit established pursuant to OAC rule 3745-31-05.

(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas as the primary fuel and the use of low NO<sub>x</sub> burners, with No. 2 fuel oil as a backup fuel with usage restrictions.
- 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).
- c. Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except for one 6-minute period per hour of not more than 27% opacity.

c) Operational Restrictions

- (1) The sulfur content of the No. 2 fuel oil employed in this emissions unit shall not exceed 0.3% by weight.
- (2) The No. 2 fuel oil usage for this emissions unit shall not exceed 112,340 gallons per year.



d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall record and maintain monthly records for this emissions unit which list the total amount of No. 2 fuel oil employed, in gallons.

These records shall be maintained for a period of not less than five years.

- (2) 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 lbs/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, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries 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 lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

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 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

e) **Reporting Requirements**

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section



of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

- (2) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods using emission factors from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Tables 1.3-1 and 1.3-3 (05/10) and Section 1.4, Tables 1.4-1 and 1.4-2 (7/98):

a. **Emission Limitations:**

When burning natural gas, PE/PM10 emissions shall not exceed 0.0075 lb/mmBtu of actual heat input.

When burning No. 2 fuel oil, PE/PM10 emissions shall not exceed 0.014 lb/mmBtu of actual heat input.

**Applicable Compliance Method:**

Compliance with the lb/mmBtu emission limitation when burning natural gas may be determined by converting the 7.6 lbs PE/PM10/10<sup>6</sup>scf emission factor into lb PE/PM10/mmBtu by dividing by 1,020 Btu/scf. Compliance with the lb/mmBtu emission limitation when burning No. 2 fuel oil may be determined by converting the 2 lbs PE/PM10/10<sup>3</sup> gal emission factor into lbs PE/PM10/mmBtu by dividing by 140 mmBtu/10<sup>3</sup> gal.

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

If required, the permittee shall demonstrate compliance with the PM10 lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 51, Appendix M, Method 201.

b. **Emission Limitations:**

When burning natural gas, SO2 emissions shall not exceed 0.0006 lb/mmBtu.

When burning No. 2 fuel oil, SO2 emissions shall not exceed 0.3 lb/mmBtu.

**Applicable Compliance Method:**

Compliance with the lb/mmBtu emission limitation when burning natural gas may be determined by converting the 0.6 lbs SO2/10<sup>6</sup>scf emission factor into lb SO<sub>2</sub>/mmBtu by dividing by 1,020 Btu/scf. Compliance with the lb/mmBtu emission



limitation when burning No. fuel oil may be determined by converting the 42.6 lbs SO<sub>2</sub>/10<sup>3</sup> gal emission factor into lbs SO<sub>2</sub>/mmBtu by dividing by 140 mmBtu/10<sup>3</sup> 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- 4, and 6.

c. Emission Limitations:

When burning natural gas, NO<sub>x</sub> emissions shall not exceed 0.05 lb/mmBtu.

When burning No. 2 fuel oil, NO<sub>x</sub> emissions shall not exceed 0.14 lb/mmBtu.

Applicable Compliance Method:

Compliance with the lb/mmBtu emission limitation when burning natural gas may be determined by converting the 50 lbsNO<sub>x</sub>/10<sup>6</sup>scf emission factor into lbNO<sub>x</sub>/mmBtu by dividing by 1,020 Btu/scf. Compliance with the lb/mmBtu emission limitation when burning No. fuel oil may be determined by converting the 20 lbsNO<sub>x</sub> /10<sup>3</sup> gal emission factor into lbsNO<sub>x</sub> /mmBtu by dividing by 140 mmBtu/10<sup>3</sup> 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- 4, and 7.

d. Emission Limitations:

When burning natural gas, CO emissions shall not exceed 0.082 lb/mmBtu.

When burning No. 2 fuel oil, CO emissions shall not exceed 0.036 lb/mmBtu.

Applicable Compliance Method:

Compliance with the lb/mmBtu emission limitation when burning natural gas may be determined by converting the 84 lbs CO/10<sup>6</sup>scf emission factor into lb CO/mmBtu by dividing by 1,020 Btu/scf. Compliance with the lb/mmBtu emission limitation when burning No. 2 fuel oil may be determined by converting the 5.0 lbs CO/10<sup>3</sup> gal emission factor into lbs CO/mmBtu by dividing by 140mmBtu/10<sup>3</sup> 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- 4, and 10.

e. Emission Limitations:

When burning natural gas, VOC emissions shall not exceed 0.005 lb/mmBtu.

When burning No. 2 fuel oil, VOC emissions shall not exceed 0.004 lb/mmBtu.



Applicable Compliance Method:

Compliance with the lb/mmBtu emission limitation when burning natural gas may be determined by converting the 5.5 lbs VOC/10<sup>6</sup>scf emission factor into lb VOC/mmBtu by dividing by 1,020 Btu/scf. Compliance with the lb/mmBtu emission limitation when burning No. 2 fuel oil may be determined by converting the 0.556 lbs VOC/10<sup>3</sup> gal emission factor into lbs VOC/mmBtu by dividing by 140 mmBtu/10<sup>3</sup> 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- 4, and 25.

(2) Emission Limitations:

PE emissions shall not exceed 0.74 TPY.

PM10 emissions shall not exceed 0.74 TPY.

Applicable Compliance Method:

The annual emissions limitation was calculated using the following equations:

$0.0075 \text{ lb of PE/PM10/mmBtu} \times 20.9 \text{ mmBtu/hr} \times 8059^* \text{ hours/year} \times \text{ton}/2000 \text{ lbs} = 0.63 \text{ TPY PE/PM10 from natural gas.}$

$2 \text{ lbs of PE/PM10}/1000 \text{ gallons of No. 2 fuel oil} \times 112,340 \text{ gallons No. 2 fuel oil/year} \times \text{ton}/2000 \text{ lbs} = 0.11 \text{ TPY of PE from No. 2 fuel oil.}$

$0.63 \text{ TPY PE/PM10 from natural gas} + 0.11 \text{ TPY of PE/PM10 from No. 2 fuel oil} = 0.74 \text{ TPY PE.}$

\* the emissions unit runs natural gas 92% of the time = 8059 hours.

(3) Emission Limitation:

SO2 emissions shall not exceed 2.44 TPY.

Applicable Compliance Method:

The annual emissions limitation was calculated using the following equations:

$0.0006 \text{ lb of SO2/mmBtu} \times 20.9 \text{ mmBtu/hr} \times 8059^* \text{ hours/year} \times \text{ton}/2000 \text{ lbs} = 0.05 \text{ TPY SO2 from natural gas.}$

$42.6 \text{ lbs of SO2}/1000 \text{ gallons of Number 2 fuel oil} \times 112,340 \text{ gallons No. 2 fuel oil/year} \times \text{ton}/2000 \text{ lbs} = 2.39 \text{ TPY of SO2 from No. 2 fuel oil.}$

$0.05 \text{ TPY SO2 from natural gas} + 2.39 \text{ TPY of SO2 from number 2 fuel oil} = 2.44 \text{ TPY SO2.}$

\* the emissions unit runs natural gas 92% of the time = 8059 hours.



(4) Emission Limitation:

NOx emissions shall not exceed 5.25 TPY.

Applicable Compliance Method:

The annual emissions limitation was calculated using the following equations:

$0.05 \text{ lb of NOx/mmBtu} \times 20.9 \text{ mmBtu/hr} \times 8059^* \text{ hours/year} \times \text{ton}/2000 \text{ lbs} = 4.13 \text{ TPY}$   
SO2 from natural gas.

$20 \text{ lbs of NOx}/1000 \text{ gallons of No. 2 fuel oil} \times 112,340 \text{ gallons No. 2 fuel oil/year} \times \text{ton}/2000 \text{ lbs} = 1.12 \text{ TPY of NOx from No. 2 fuel oil.}$

$4.13 \text{ TPY NOx from natural gas} + 1.12 \text{ TPY of NOx from No. 2 fuel oil} = 5.25 \text{ TPY NOx.}$

\* the emission unit runs natural gas 92% of the time = 8059 hours.

(5) Emission Limitation:

CO emissions shall not exceed 7.51 TPY.

Applicable Compliance Method:

The annual emissions limitation was calculated using the following equation:

$0.082 \text{ lb of CO/mmBtu} \times 20.9 \text{ mmBtu/hr} \times 8760^* \text{ hours/year} \times \text{ton}/2000 \text{ lbs} = 7.51 \text{ TPY}$   
SO2 from natural gas.

\* Since the natural gas emission factor for CO was greater than the No. 2 fuel oil emission factor for CO, this emission limitation was calculated using the worst case emission factor from natural gas at 8760 hours.

(6) Emission Limitation:

VOC emissions shall not exceed 0.46 TPY.

Applicable Compliance Method:

The annual emissions limitation was calculated using the following equation:

$0.005 \text{ lb of VOC/mmBtu} \times 20.9 \text{ mmBtu/hr} \times 8760^* \text{ hours/year} \times \text{ton}/2000 \text{ lbs} = 0.46 \text{ TPY}$   
VOC from natural gas.

\* Since the natural gas emission factor for VOC was greater than the No. 2 fuel oil emission factor for VOC, this emission limitation was calculated using the worst case emission factor from natural gas at 8760 hours.



(7) Fuel Usage Limitation:

The No. 2 fuel oil usage for this emissions unit shall not exceed 112,340 gallons/year.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirement described in paragraph d)(1).

(8) Sulfur Content Limitation:

The sulfur content of the No. 2 fuel oil employed in this emissions unit shall not exceed 0.3% by weight.

Applicable Compliance Method:

Compliance shall be demonstrated by the record keeping requirement described in paragraph d)(2).

(9) Visible Particulate Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method:

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

g) Miscellaneous Requirements

(1) None.