



John R. Kasich, Governor  
 Mary Taylor, Lt. Governor  
 Craig W. Butler, Director

12/17/2014

Certified Mail

TIM MOSLEY  
 PARMA COMMUNITY GENERAL HOSPITAL  
 7007 POWERS BLVD  
 PARMA, OH 44129

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 1318452983  
 Permit Number: P0116106  
 Permit Type: Renewal  
 County: Cuyahoga

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Plain Dealer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically 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. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall and Cleveland Division of Air Quality  
 Permit Review/Development Section 2nd Floor  
 Ohio EPA, DAPC 75 Erieview Plaza  
 50 West Town Street Suite 700 Cleveland, OH 44114  
 PO Box 1049  
 Columbus, Ohio 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification  
 CDAQ; Pennsylvania; Canada





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor (FEPTIO) Determination

Netting Determination

2. Source Description:

The Parma Community General Hospital (PCGH) is a facility providing health care services for individuals. The emissions units of concern are two 18.8 mmBtu/hr natural gas (No.2 fuel oil backup) boilers for space heating.

3. Facility Emissions and Attainment Status:

The facility is located in the City of Cleveland, in Cuyahoga County. Cuyahoga County is in attainment for ozone and PM<sub>2.5</sub> emissions.

4. Source Emissions:

This is a renewal for FEPTIO permit P0104611 issued 5/11/2009.

Parma Hospital was previously a Title V facility. They obtained Synthetic Minor PTI 13-04687, issued Draft then Final, on February 20, 2007 for B008 and B009. With the issuance of PTI 13-04687, PCGH shut down boilers B004 through B006. The PCGH would potentially be a Title V source for SO<sub>2</sub>. Emissions units (B008 and B009) have the potential to emit 82.4 TPY of SO<sub>2</sub> emissions. The total PTE for the facility would increase to 124.1 TPY (41.7 tpy + 82.4 tpy) resulting in Title V applicability. However, the permit includes federally enforceable restrictions on No.2 fuel oil usage in order to avoid Title V permitting. The allowable will be 24.5 TPY of SO<sub>2</sub> emissions, combined for emissions units B008 and B009. This results in a total facility PTE for SO<sub>2</sub> of 60.12 TPY (35.62 tpy + 24.5 tpy).

5. Conclusion:

The No. 2 fuel oil restrictions contained in this FEPTIO are adequate to provide federally enforceable limitations for assuring that applicable Title V thresholds will not be exceeded.

6. Please provide additional notes or comments as necessary:

None



**Permit Strategy Write-Up**  
PARMA COMMUNITY GENERAL HOSPITAL  
**Permit Number:** P0116106  
**Facility ID:** 1318452983

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
SO2	24.5 (B008 and B009 combined)

PUBLIC NOTICE

12/17/2014 Issuance of Draft Air Pollution Permit-To-Install and Operate

PARMA COMMUNITY GENERAL HOSPITAL

7007 POWERS BLVD,

PARMA, OH 44129

Cuyahoga County

FACILITY DESC.: General Medical and Surgical Hospitals

PERMIT #: P0116106

PERMIT TYPE: Renewal

PERMIT DESC: Renewal FEPTIO for emissions units B008 and B009 which are each 18.8 mmBtu/hr natural gas/No. 2 fuel oil fired boilers.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: David Hearne, Cleveland Division of Air Quality, 2nd Floor 75 Erieview Plaza, Cleveland, OH 44114. Ph: (216)664-2297





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
PARMA COMMUNITY GENERAL HOSPITAL**

Facility ID:	1318452983
Permit Number:	P0116106
Permit Type:	Renewal
Issued:	12/17/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
PARMA COMMUNITY GENERAL HOSPITAL

**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. Emissions Unit Group -Boilers: B008,B009, .....	11





**Draft Permit-to-Install and Operate**  
PARMA COMMUNITY GENERAL HOSPITAL  
**Permit Number:** P0116106  
**Facility ID:** 1318452983  
**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 1318452983  
Application Number(s): A0049569  
Permit Number: P0116106  
Permit Description: Renewal FEPTIO for emissions units B008 and B009 which are each 18.8 mmBtu/hr natural gas/No. 2 fuel oil fired boilers.  
Permit Type: Renewal  
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 12/17/2014  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

PARMA COMMUNITY GENERAL HOSPITAL  
7007 POWERS BLVD  
PARMA, OH 44129

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:

Cleveland Division of Air Quality  
2nd Floor  
75 Erievue Plaza  
Cleveland, OH 44114  
(216)664-2297

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



## Authorization (continued)

Permit Number: P0116106

Permit Description: Renewal FEPTIO for emissions units B008 and B009 which are each 18.8 mmBtu/hr natural gas/No. 2 fuel oil fired boilers.

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

**Group Name: Boilers**

<b>Emissions Unit ID:</b>	<b>B008</b>
Company Equipment ID:	Boiler # 2
Superseded Permit Number:	P0104611
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B009</b>
Company Equipment ID:	Boiler # 3
Superseded Permit Number:	P0104611
General Permit Category andType:	Not Applicable



**Draft Permit-to-Install and Operate**  
PARMA COMMUNITY GENERAL HOSPITAL  
**Permit Number:** P0116106  
**Facility ID:** 1318452983  
**Effective Date:** To be entered upon final issuance

## **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 Cleveland Division of Air Quality 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.



**Draft Permit-to-Install and Operate**  
PARMA COMMUNITY GENERAL HOSPITAL  
**Permit Number:** P0116106  
**Facility ID:** 1318452983  
**Effective Date:** To be entered upon final issuance

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



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) B.2, B.3, and B.4
2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources. These requirements apply to emissions units B007, B008, and B009. At this time the Ohio EPA is not accepting the delegating authority to enforce the standards promulgated under the Urban Air Toxics Strategy. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this Subpart (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the Cleveland Division of Air Quality.
3. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart WWWW, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hospital Ethylene Oxide Sterilizers. These requirements apply to emissions unit P001. At this time the Ohio EPA is not accepting the delegating authority to enforce the standards promulgated under the Urban Air Toxics Strategy. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this Subpart (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the Cleveland Division of Air Quality.
4. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. These requirements apply to emissions units B010 and B011. The complete requirements of this rule (including the Part 60 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the Cleveland Division of Air Quality.



**Draft Permit-to-Install and Operate**  
PARMA COMMUNITY GENERAL HOSPITAL  
**Permit Number:** P0116106  
**Facility ID:** 1318452983  
**Effective Date:** To be entered upon final issuance

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



**1. Emissions Unit Group -Boilers: B008,B009,**

EU ID	Operations, Property and/or Equipment Description
B008	18.8 mmBtu/hr Natural Gas/No. 2 Fuel Oil Boiler
B009	18.8 mmBtu/hr Natural Gas/No. 2 Fuel Oil Boiler

- 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)  PTI 13-04687 issued 2/20/2007; FEPTIO P0104611 issued 5/11/2009	a) The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart Dc and OAC rule 3745-31-05(D).
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-10(B)(1)	0.020 pound of particulate emissions per million Btu of actual heat input.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-18-06(D)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60 Subpart Dc.
e.	40 CFR Part 60 Subpart Dc	0.5 pound of SO <sub>2</sub> emissions per million Btu of actual heat input.
g.	OAC rule 3745-31-05(D) FEPTIO to avoid Title V	Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 12.25 TPY as a rolling, 12-month summation.  Nitrogen oxide (NO <sub>x</sub> ) emissions shall not exceed 3.5 TPY as a rolling, 12-month summation (when burning fuel oil).  See c)(3) below.
h.	OAC rule 3745-31-05(A)(3) as effective 12/1/06	b) Emissions shall not exceed:  NO <sub>x</sub> : 1.79 lbs/hr and 7.84 tpy (when burning natural gas) VOC: 0.19 lb/hr and 0.83 tpy CO: 1.50 lb/hr and 6.57 tpy PE: 1.65 tpy  See b)(2)c. below.
i.	OAC rule 3745-31-05(A)(3)(a)(ii)	c) See b)(2)d. below.

(2) Additional Terms and Conditions

- 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 b)(1).
- 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. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality



Standards (NAAQS) pollutants less than 10 tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirements to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- d. This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation plan:

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions from this emissions unit since the calculated annual emissions rate for particulate emissions for B008 and B009 is less than ten tons per year taking into account the federally enforceable rule limit of 0.2 pound of particulates per million Btu of actual heat input under OAC rule 3745-17-10(B)(1).

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to NO<sub>x</sub> (from natural gas combustion), VOC, and CO from these emissions units since the uncontrolled potential to emit for B008 and B009 is less than 10 tons/year for each pollutant.

The permit for this emissions unit takes into account the restriction upon oil usage, as proposed by the permittee, for the purpose of avoiding the BAT requirement under OAC rule 3745-31-05(A)(3) for NO<sub>x</sub>.

- c) **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.

- d) **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 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.

- (2) The owner or operator 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; and
  - c. 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.

e) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept



hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Cleveland Division of Air Quality, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:  
  
The maximum annual No. 2 fuel oil usage rate for this emissions unit shall not exceed 350,000 gallons per rolling, 12-month period
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Cleveland Division of Air Quality.

- (3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted 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.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in b) 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):  
If required, 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 SO<sub>2</sub>/mmBtu, 12.25 TPY SO<sub>2</sub> 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 d)(1). Compliance with the annual emission limitation shall be determined by multiplying the monthly average lb SO<sub>2</sub>/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 or 6C.
- 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/10<sup>3</sup> gal emission factor into lbs PE/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 -5.
- d. Emission Limitation(s):  
≤ 0.5 weight percent sulfur
- Applicable Compliance Method:  
Compliance shall be demonstrated by the record keeping requirement described in d)(1).



- e. Emission Limitation(s):  
3.5 TPY of NO<sub>x</sub> 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<sub>x</sub> (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

- f. Emission Limitation(s):  
1.79 lbsNO<sub>x</sub>/hr and 7.84 tpyNO<sub>x</sub> (when burning natural gas)  
0.19 lb VOC/hr and 0.83 tpy VOC  
1.50 lbs CO/hr and 6.57 tpy CO  
1.65 tpy PE

Applicable Compliance Method:

Emission limits established at maximum potential to emit, see g)(2) below.

g) Miscellaneous Requirements

- (1) Emissions units B008 and B009 were installed 6/1/2007 and 7/1/2007, respectively.  
(2) The potential to emit for NO<sub>x</sub>, VOC, CO, PM, and SO<sub>2</sub> were determined as follows:

Emissions from the burning of natural gas:

$$\begin{aligned} * \text{NO}_x & 100 \text{ lbsNO}_x/\text{mmcf} * \text{mmcf}/1050 \text{ mmBtu} * 18.8 \text{ mmBtu/hr} = 1.79\text{lbNO}_x/\text{hr} \\ & 1.79\text{lbNO}_x/\text{hr} * 8760 \text{ hr/yr} * 1 \text{ ton}/2000 \text{ lbs} = 7.84\text{tpyNO}_x \end{aligned}$$

$$\begin{aligned} * \text{VOC} & 11 \text{ lbs VOC}/\text{mmcf} * \text{mmcf}/1050 \text{ mmBtu} * 18.8 \text{ mmbtu/hr} = 0.19\text{lb VOC}/\text{hr} \\ & 0.19\text{lb}/\text{hr} * 8760 \text{ hr/yr} * 1 \text{ ton}/2000 \text{ lbs} = 0.83\text{tpy VOC} \end{aligned}$$

$$\begin{aligned} * \text{CO} & 84 \text{ lbs CO}/\text{mmcf} * \text{mmcf}/1050 \text{ mmBtu} * 18.8 \text{ mmBtu/hr} = 1.50\text{lb CO}/\text{hr} \\ & 1.50\text{lb CO}/\text{hr} * 8760 \text{ hr/yr} * 1 \text{ ton}/2000 \text{ lbs} = 6.57\text{tpy CO} \end{aligned}$$

$$\begin{aligned} \text{PM} & 0.02 \text{ lb}/\text{mmBtu} * 18.8 \text{ mmBtu/hr} = 0.376 \text{ lb PM}/\text{hr} \\ & 0.376 \text{ lb PM}/\text{hr} * 8760 \text{ hr/yr} * \text{ton}/2000 \text{ lbs} = 1.65\text{tpy PM} \\ & \text{Based on allowable limit from OAC rule 3745-17-10(B)} \end{aligned}$$

\* Emission factors from AP-42 Tables 1.4-1 and 1.4-2

Emissions from No. 2 Fuel Oil:

$$\text{SO}_2 \quad 70 \text{ lb}/1000 \text{ gal} * 350,000 \text{ gal/yr} * \text{ton}/2000 \text{ lbs} = 12.25 \text{ tpy}$$

$$\text{NO}_x \quad 20 \text{ lb}/1000 \text{ gal} * 350,000 \text{ gal/yr} * \text{ton}/2000 \text{ lbs} = 3.5 \text{ tpy}$$

$$\text{CO} \quad 5 \text{ lb}/1000 \text{ gal} * 350,000 \text{ gal/yr} * \text{ton}/2000 \text{ lbs} = 0.9 \text{ tpy}$$



**Draft Permit-to-Install and Operate**  
PARMA COMMUNITY GENERAL HOSPITAL

**Permit Number:** P0116106

**Facility ID:** 1318452983

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

$PM_2 \text{ lb}/1000 \text{ gal} * 350,000 \text{ gal/yr} * \text{ton}/2000 \text{ lbs} = 0.35 \text{ tpy}$

Emission factors from AP-42 Table 1.3-1