



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
HAMILTON COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

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

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 14-05858

Fac ID: 1431052004

DATE: 9/7/2006

The Procter and Gamble Company
Dave Trickey
11510 Reed Hartman Highway
Cincinnati, OH 45241

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final 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 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
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

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

CC: USEPA

HCDES



**Permit To Install
Terms and Conditions**

**Issue Date: 9/7/2006
Effective Date: 9/7/2006**

FINAL PERMIT TO INSTALL 14-05858

Application Number: 14-05858
Facility ID: 1431052004
Permit Fee: **\$400**
Name of Facility: The Procter and Gamble Company
Person to Contact: Dave Trickey
Address: 11510 Reed Hartman Highway
Cincinnati, OH 45241

Location of proposed air contaminant source(s) [emissions unit(s)]:
**11510 Reed Hartman Highway
Cincinnati, Ohio**

Description of proposed emissions unit(s):
Procter and Gamble have submitted a PTI application for the installation of 2 natural gas fired boilers at their Sharon Woods Technical Center facility.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon

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the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

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

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

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

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
SO ₂	13.98
NO _x	23.98

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment - (B009) - 18.84 mmBtu/hr Natural Gas/No. 2 Fuel Oil Fired Boiler

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The nitrogen oxides (NOx) emissions from this emissions unit shall not exceed 0.12 lb of NOx/mmBtu of actual heat input when burning natural gas.</p> <p>The NOx emissions from this emissions unit shall not exceed 0.27 lb of NOx/mmBtu of actual heat input when burning No. 2 fuel oil.</p> <p>The NOx emissions from this emissions unit shall not exceed 11.99 TPY.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart Dc.</p>
40 CFR Part 60 Subpart Dc	The sulfur dioxide (SO ₂) emissions rate shall not exceed 0.50 lb/mmBtu of actual heat input when burning No. 2 fuel oil.
OAC rule 3745-31-02(A)	<p>The sulfur dioxide (SO₂) emissions rate shall not exceed 6.99 tons/year based on rolling 12-month summation.</p> <p>See terms A.2.d and B.2.</p>
OAC rule 3745-18-06(D)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to 40 CFR Part 60 Subpart Dc.
OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.
OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input.
ORC 3704.03(T)(4)	See terms A.2.e and A.2.f.

Issued: 9/7/2006**2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas and No. 2 fuel oil and the NO_x emissions limitations listed in term A.1 above.
- 2.b** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.c** The lb/mmBtu emission limitations outlined in term A.1 is based upon the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.
- 2.d** Permit to install 14-05858 for this air contaminant source takes into account the usage restriction on No. 2 fuel oil to 200,000 gallons per year, as a voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).
- 2.e** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate matter 10 microns and less in diameter (PM₁₀), volatile organic compounds (VOC) and carbon monoxide (CO) emissions from this air contaminant source because the uncontrolled potential to emit for these emissions is less than ten tons per year.
- 2.f** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) from this air contaminant source because the calculated annual emission rate for PE is less than 10 tons per year taking into account the federally enforceable rule limit of 0.020 lb/mmBtu under OAC rule

B. Operational Restrictions

1. The permittee shall burn only natural gas and/or No. 2 fuel oil in this emissions unit.
2. The maximum fuel oil usage in this emissions unit shall not exceed 200,000 gallons of No. 2 fuel oil per year, based on a rolling, 12-month summation of the No. 2 fuel oil usage figures.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative No. 2 fuel oil Usage (Gallons)</u>
1	40,000
1-2	80,000
1-3	120,000
1-4	160,000
1-5	180,000
1-6	200,000
1-7	200,000
1-8	200,000
1-9	200,000
1-10	200,000
1-11	200,000
1-12	200,000

C. 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:

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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, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

b. Alternative 2:

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

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

2. The permittee shall maintain records of the following information:

- a. The total amount of natural gas (in cubic feet) burned in this emissions unit each month.
- b. The total number of gallons of No. 2 fuel oil burned in this emissions unit each month.
- c. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling 12-month summation of

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No. 2 fuel oil burned, in gallons in this emissions unit.

- d. During the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative No. 2 fuel oil burned, in gallons for each calendar month.
- e. The total rolling 12-month summation of SO₂ emissions in tons per year for this emissions unit.
- f. The total emissions of NO_x in tons per year for each calendar year.
- g. Any day when a fuel other than natural gas or No. 2 fuel oil was used in this emissions unit.

D. Reporting Requirements

- 1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from Section C. 1 above. The notification shall include a copy of such record and shall be sent the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
- 2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month No. 2 fuel oil use limitation and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative No. 2 fuel oil use limitation. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
- 3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month SO₂ emissions limitation. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through

Emissions Unit ID: **B009**

March, April through June and July through September, respectively).

4. The permittee shall submit a deviation report within 45 days to the Hamilton County Department of Environmental Services that identifies any day when a fuel other than natural gas or No. 2 fuel oil is used in this emissions unit.
5. The permittee shall submit annual reports which specify the total NOx emissions from this emissions unit for the previous calendar year. These reports shall be sent to the Hamilton County Department of Environmental Services by January 31 of each year.
6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
7. Pursuant to the NSPS, the permittee is required to report the following information at the appropriate times (if the information has not already been reported):
 - a. construction date (no later than 30 days after such date);
 - b. actual start-up date (within 15 days after such date);
 - c. date of performance testing (if required, at least 30 days prior to testing);
 - d. the design heat input capacity of the emissions unit and the type of fuel to be combusted; and
 - e. the annual capacity factor at which the permittee anticipates operating the emissions unit.

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P. O. Box 1049
Columbus, Ohio 43216-1049

and

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Department of Environmental Services
250 William Howard Taft Road
Cincinnati, Ohio 45219

E. Testing Requirements

1. Compliance with the emissions limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following method(s):

Emissions Limitations

The nitrogen oxides (NO_x) emissions from this emissions unit shall not exceed 0.12 lb of NO_x/mmBtu of actual heat input when burning natural gas.

The NO_x emissions from this emissions unit shall not exceed 0.27 lb of NO_x/mmBtu of actual heat input when burning No. 2 fuel oil.

The NO_x emissions from this emissions unit shall not exceed 11.99 TPY.

Applicable Compliance Methods

The NO_x emissions limitations in terms of pounds of NO_x per mmBtu are based on the equipment vendor's guarantee as provided in air Permit to Install application 14-05858 submitted on June 19, 2006. If required, compliance with the emissions limitations shall be demonstrated by emissions testing using USEPA methods 1 through 4 and 7 in 40 CFR Part 60 Appendix A.

Compliance with the annual emissions limitation shall be based on the maximum lb/mmBtu multiplied by the actual fuel usage rates (mmBtu/yr) and multiplied by 1 ton/2000 lbs such that the product equals TPY NO_x.

Emissions Limitations

The sulfur dioxide (SO₂) emissions rate shall not exceed 6.99 tons/year based on rolling 12-month summation.

The sulfur dioxide (SO₂) emissions rate shall not exceed 0.50 lb/mmBtu of actual heat input.

Applicable Compliance Methods

The SO₂ emissions limitation in terms of pounds of SO₂ per mmBtu is based on the equipment vendor's guarantee as provided in air Permit to Install application 14-05858

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submitted on June 19, 2006. If required, compliance with the emissions limitation shall be demonstrated by emissions testing using USEPA methods 1 through 4 and 6 in 40 CFR Part 60 Appendix A.

Compliance with the annual emissions limitation shall be based on the actual lb/mmBtu for the fuel oil as determined from term and condition C.1 and the maximum lb/mmBtu for natural gas multiplied by the actual fuel usage rates (mmBtu/yr) from term and condition C.2 and multiplied by 1 ton/2000 lbs such that the product equals TPY SO₂.

Emissions Limitation

Particulate emissions (PE) shall not exceed 0.020 lb/mmBtu of actual heat input.

Applicable Compliance Methods

The PE emissions limitation in terms of pounds of PE per mmBtu is based on the requirements of OAC 3745-17-10. If required, compliance with the emissions limitation shall be demonstrated by emissions testing using USEPA methods 1 through 5 in 40 CFR Part 60 Appendix A.

Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

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

2. Compliance with the fuel use limitations in term B.1 shall be demonstrated by the recordkeeping in term C.2.
3. Compliance with the fuel use limitations in term B.2 shall be demonstrated by the recordkeeping in term C.2.

F. Miscellaneous Requirements

None

Issued: 9/7/2006

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

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

Operations, Property, and/or Equipment - (B010) - 18.84 MMBTU/hr Natural Gas/No. 2 Fuel Oil Fired Boiler

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The nitrogen oxides (NO_x) emissions from this emissions unit shall not exceed 0.12 lb of NO_x/mmBtu of actual heat input when burning natural gas.</p> <p>The NO_x emissions from this emissions unit shall not exceed 0.27 lb of NO_x/mmBtu of actual heat input when burning No. 2 fuel oil.</p> <p>The NO_x emissions from this emissions unit shall not exceed 11.99 TPY.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 60 Subpart Dc.</p>
40 CFR Part 60 Subpart Dc	The sulfur dioxide (SO ₂) emissions rate shall not exceed 0.50 lb/mmBtu of actual heat input when burning No. 2 fuel oil.
OAC rule 3745-31-02(A)	<p>The sulfur dioxide (SO₂) emissions rate shall not exceed 6.99 tons/year based on rolling 12-month summation.</p> <p>See terms A.2.d and B.2.</p>
OAC rule 3745-18-06(D)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to 40 CFR Part 60 Subpart Dc.
OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input.
ORC 3704.03(T)(4)	See terms A.2.e and A.2.f.

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas and No. 2 fuel oil and the NOx emissions limitations listed in term A.1 above.
- 2.b** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- 2.c** The lb/mmBtu emission limitations outlined in term A.1 is based upon the emissions unit's potential to emit (PTE). Therefore, no records are required to demonstrate compliance with these limits.
- 2.d** Permit to install 14-05858 for this air contaminant source takes into account the usage restriction on No. 2 fuel oil to 200,000 gallons per year, as a voluntary restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).
- 2.e** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate matter 10 microns and less in diameter (PM10), volatile organic compounds (VOC) and carbon monoxide (CO) emissions from this air contaminant source because the uncontrolled potential to emit for these emissions is less than ten tons per year.
- 2.f** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) from this air contaminant source because the calculated annual emission rate for PE is less than 10 tons per year taking into account the federally enforceable

Emissions Unit ID: **B010**
rule limit of 0.020
lb/mmBtu under OAC rule
3745-17-10.

B. Operational Restrictions

1. The permittee shall burn only natural gas and/or No. 2 fuel oil in this emissions unit.
2. The maximum fuel usage in this emissions unit shall not exceed 200,000 gallons of No. 2 fuel oil per year, based on a rolling, 12-month summation of the No. 2 fuel oil usage figures.

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

<u>Month(s)</u>	<u>Maximum Allowable Cumulative No. 2 fuel oil Usage (Gallons)</u>
1	40,000
1-2	80,000
1-3	120,000
1-4	160,000
1-5	180,000
1-6	200,000
1-7	200,000
1-8	200,000
1-9	200,000
1-10	200,000
1-11	200,000
1-12	200,000

C. 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.

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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, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

b. Alternative 2:

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

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

2. The permittee shall maintain records of the following information:

- a. The total amount of natural gas (in cubic feet) burned in this emissions unit each month.
- b. The total number of gallons of No. 2 fuel oil burned in this emissions unit each month.

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- c. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling 12-month summation of No. 2 fuel oil burned, in gallons in this emissions unit.
- d. During the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative No. 2 fuel oil burned, in gallons for each calendar month.
- e. The total rolling 12-month summation of SO₂ emissions in tons per year for this emissions unit.
- f. The total emissions of NO_x in tons per year for each calendar year.
- g. Any day when a fuel other than natural gas or No. 2 fuel oil was used in this emissions unit.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from Section C. 1 above. The notification shall include a copy of such record and shall be sent the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
2. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month No. 2 fuel oil use limitation and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative No. 2 fuel oil use limitation. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).
3. The permittee shall submit quarterly deviation (excursion) reports to the Hamilton County Department of Environmental Services which identify all exceedances of the rolling, 12-month SO₂ emissions limitation. If no deviations occurred during the reporting period, the permittee shall state so in the report. The permittee shall submit the reports by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through

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March, April through June and July through September, respectively).

4. The permittee shall submit a deviation report within 45 days to the Hamilton County Department of Environmental Services that identifies any day when a fuel other than natural gas or No. 2 fuel oil is used in this emissions unit.
5. The permittee shall submit annual reports which specify the total NOx emissions from this emissions unit for the previous calendar year. These reports shall be sent to the Hamilton County Department of Environmental Services by January 31 of each year.
6. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
7. Pursuant to the NSPS, the permittee is required to report the following information at the appropriate times (if the information has not already been reported):
 - a. construction date (no later than 30 days after such date);
 - b. actual start-up date (within 15 days after such date);
 - c. date of performance testing (if required, at least 30 days prior to testing);
 - d. the design heat input capacity of the emissions unit and the type of fuel to be combusted; and
 - e. the annual capacity factor at which the permittee anticipates operating the emissions unit.

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P. O. Box 1049
Columbus, Ohio 43216-1049

and

Department of Environmental Services
250 William Howard Taft Road

Cincinnati, Ohio 45219

E. Testing Requirements

1. Compliance with the emissions limitations in Sections A.1 and A.2 of these terms and conditions shall be determined in accordance with the following method(s):

Emissions Limitations

The nitrogen oxides (NO_x) emissions from this emissions unit shall not exceed 0.12 lb of NO_x/mmBtu of actual heat input when burning natural gas.

The NO_x emissions from this emissions unit shall not exceed 0.27 lb of NO_x/mmBtu of actual heat input when burning No. 2 fuel oil.

The NO_x emissions from this emissions unit shall not exceed 11.99 TPY.

Applicable Compliance Methods

The NO_x emissions limitations in terms of pounds of NO_x per mmBtu are based on the equipment vendor's guarantee as provided in air Permit to Install application 14-05858 submitted on June 19, 2006. If required, compliance with the emissions limitations shall be demonstrated by emissions testing using USEPA methods 1 through 4 and 7 in 40 CFR Part 60 Appendix A.

Compliance with the annual emissions limitation shall be based on the maximum lb/mmBtu multiplied by the actual fuel usage rates (mmBtu/yr) and multiplied by 1 ton/2000 lbs such that the product equals TPY NO_x.

Emissions Limitations

The sulfur dioxide (SO₂) emissions rate shall not exceed 6.99 tons/year based on rolling 12-month summation.

The sulfur dioxide (SO₂) emissions rate shall not exceed 0.50 lb/mmBtu of actual heat input.

Applicable Compliance Methods

The SO₂ emissions limitation in terms of pounds of SO₂ per mmBtu is based on the equipment vendor's guarantee as provided in air Permit to Install application 14-05858 submitted on June 19, 2006. If required, compliance with the emissions limitation shall be demonstrated by emissions testing using USEPA methods 1 through 4 and 6 in 40 CFR Part 60 Appendix A.

Compliance with the annual emissions limitation shall be based on the actual lb/mmBtu

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for the fuel oil as determined from term and condition C.1 and the maximum lb/mmBtu for natural gas multiplied by the actual fuel usage rates (mmBtu/yr) from term and condition C.2 and multiplied by 1 ton/2000 lbs such that the product equals TPY SO₂.

Emissions Limitation

Particulate emissions (PE) shall not exceed 0.020 lb/mmBtu of actual heat input.

Applicable Compliance Methods

The PE emissions limitation in terms of pounds of PE per mmBtu is based on the requirements of OAC 3745-17-10. If required, compliance with the emissions limitation shall be demonstrated by emissions testing using USEPA methods 1 through 5 in 40 CFR Part 60 Appendix A.

Emissions Limitation

Visible particulate emissions from any stack shall not exceed twenty percent (20%) opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method

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

2. Compliance with the fuel use limitations in term B.1 shall be demonstrated by the recordkeeping in term C.2.
3. Compliance with the fuel use limitations in term B.2 shall be demonstrated by the recordkeeping in term C.2.

F. Miscellaneous Requirements

None