



2/27/2015

Certified Mail

DWIGHT LOCKWOOD
 LIMA ENERGY COMPANY
 312 WALNUT ST, SUITE 1600
 CINCINNATI, OH 45202

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
 Facility ID: 0302020336
 Permit Number: P0118491
 Permit Type: Administrative Modification
 County: Allen

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

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

How to give us feedback on your permitting experience

Please complete a survey at 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 by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



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

Cc: Ohio EPA-NWDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
LIMA ENERGY COMPANY**

Facility ID:	0302020336
Permit Number:	P0118491
Permit Type:	Administrative Modification
Issued:	2/27/2015
Effective:	2/27/2015
Expiration:	4/25/2019



Division of Air Pollution Control
Permit-to-Install and Operate
for
LIMA ENERGY COMPANY

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Final Permit-to-Install and Operate
LIMA ENERGY COMPANY
Permit Number: P0118491
Facility ID: 0302020336
Effective Date: 2/27/2015

Authorization

Facility ID: 0302020336
Application Number(s): M0003266
Permit Number: P0118491
Permit Description: Administrative permit modification to remove the synthetic minor restrictions associated with limiting greenhouse gas emissions
Permit Type: Administrative Modification
Permit Fee: \$850.00
Issue Date: 2/27/2015
Effective Date: 2/27/2015
Expiration Date: 4/25/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

LIMA ENERGY COMPANY
1046 SOUTH MAIN ST
Lima, OH 45804

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:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

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: P0118491
 Permit Description: Administrative permit modification to remove the synthetic minor restrictions associated with limiting greenhouse gas emissions

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

Emissions Unit ID: B001
 Company Equipment ID: B001
 Superseded Permit Number: P0115577
 General Permit Category and Type: Not Applicable

Emissions Unit ID: P005
 Company Equipment ID: P005
 Superseded Permit Number: P0115577
 General Permit Category and Type: Not Applicable

Group Name: dryers

Emissions Unit ID:	P010
Company Equipment ID:	P001
Superseded Permit Number:	P0115577
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P011
Company Equipment ID:	P002
Superseded Permit Number:	P0115577
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P012
Company Equipment ID:	P003
Superseded Permit Number:	P0115577
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P013
Company Equipment ID:	P004
Superseded Permit Number:	P0115577
General Permit Category and Type:	Not Applicable



Final Permit-to-Install and Operate
LIMA ENERGY COMPANY
Permit Number: P0118491
Facility ID: 0302020336
Effective Date: 2/27/2015

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
LIMA ENERGY COMPANY
Permit Number: P0118491
Facility ID: 0302020336
Effective Date: 2/27/2015

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) None.

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/Institutional Boilers and Process Heaters at Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology (GACT) NESHAP applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.

3. The following sources are subject to the applicable provision of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR part 60:

Emissions Unit	Source Description	NSPS Regulation (Subpart)
B001	Boiler	Dc
P010-P013	Drying Mills 1-4	Y

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

- a) Construction date (no later than 30 days after such date);
- b) Actual start-up date (within 15 days after such date); and
- c) Date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to the Ohio EPA District Office or local air agency responsible for the permitting of the facility.



Final Permit-to-Install and Operate
LIMA ENERGY COMPANY
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Effective Date: 2/27/2015

C. Emissions Unit Terms and Conditions



1. B001, B001

Operations, Property and/or Equipment Description:

50MMBtu/hr Auxiliary 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. b)(1)c and b)(2)c.
- 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.	ORC rule 3704.03(T)	0.049 pound of nitrogen oxides (NO _x) per MMBtu heat input carbon monoxide (CO) emissions shall not exceed 1.53 tons per month averaged over a 12-month rolling period See b)(2)a.
b.	OAC rule 3745-31-05(A)(3), as effective 6/30/08	See b)(2)b.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/08	See b)(2)c.
d.	OAC rule 3745-17-10(B)(1)	0.020 lb particulate emission (PE) per mmBtu
e.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a 6-minute average, except as specified by rule
f.	OAC rule 3745-18-06	See b)(2)d.
g.	40 CFR, Part 60, Subpart Dc	Record keeping requirements



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		See d)(1)a.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) requirements established under ORC rule 3704.03(T) apply to the NO_x and CO emissions from this emissions unit, and have been determined to be the use of low NO_x burners designed to meet a emissions standard of 0.049 lb NO_x/mmBtu, and compliance with the CO emission limitation of 1.5 tons of CO per month, averaged over a 12-month rolling period, respectively.
- b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) for the sulfur dioxide (SO₂), particulate matter 10 microns or less in size (PM₁₀), and volatile organic compounds (VOC) emissions from this emissions unit have been determined to be compliance with the requirement to use pipeline quality natural gas as specified in condition c)(1).

These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

- c. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO₂, PM₁₀, and VOC emissions from this air contaminant source since the uncontrolled potential to emit for SO₂, PM₁₀, and VOC is each less than 10 tons/year.

These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) as part of the Ohio SIP.

- d. The emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A)(3).

c) Operational Restrictions

- (1) The permittee shall burn only pipeline quality natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
 - a. the natural gas usage for each month, in mmcf;
- (2) For each day during which the permittee burns a fuel other than pipeline quality natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements



- (1) 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.
- (2) 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 District Office or Local Air Agency, 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.

f) **Testing Requirements**

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

1.53 tons of CO per month averaged over a 12-month rolling period

Applicable Compliance Method:

The monthly CO emissions limitation represents the potential to emit* for this emissions unit and therefore no record keeping or reporting requirements are necessary to demonstrate compliance with this emissions limit.

The potential CO emissions were calculated by multiplying the AP-42 emission factor of 84 lb of CO/MMcf (Table 1.4-1, [7/98]), the heat content of the fuel of 1000 MMBtu/MMcf, the maximum heat input rating of 50 MMBtu/hr, and then by the maximum operating schedule of 8760 hours/year and dividing by 2000 lbs/ton (18.4 tons of CO/yr). If required, the permittee shall demonstrate compliance by emission testing in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

b. Emission Limitation:

0.020 lb PE per mmBtu

Applicable Compliance Method:



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LIMA ENERGY COMPANY

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If required, the permittee shall demonstrate compliance by testing in accordance with the methods specified in OAC rule 3745-17-03(B)(7).

c. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation pursuant to OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.



2. P005, P005

Operations, Property and/or Equipment Description:

Synthetic Fuel Processing Operations including Gasifiers, Claus Unit, and CO2 compressor, controlled by a Thermal Oxidizer

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. b)(1)c and b)(2)d.

(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. b)(1)d., b)(2)e., c)(1), c)(2), d)(1), e)(1), f)(1)a, f)(1)b and f)(1)c.

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.	ORC rule 3704.03(T)	See b)(2)b.
b.	OAC rule 3745-31-05(A)(3), as effective 6/30/08	See b)(2)c.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/08	See b)(2)d.
d.	OAC rule 3745-31-05(D)	sulfur dioxide (SO ₂) emissions shall not exceed: 3.84 tons per startup; 5.82 tons per shutdown; and 23.1 tons SO ₂ /rolling, 12-month period, from the startup and shutdowns combined See b)(2)e.



(2) Additional Terms and Conditions

- a. Emissions unit P005 involves a gasification process which converts petroleum coke and other solid hydrocarbon feedstock into ultra clean synthetic crude (USCS). Emissions unit P005 consists of two separate gasification trains with one thermal oxidizer controlling both trains. Each gasification train consists of the following processes/equipment;
 - i. two gasification units;
 - ii. shift reaction unit;
 - iii. acid gas removal (AGR) unit;
 - iv. sulfur recovery unit (SRU);
 - v. Shell Claus Offgas Treatment (SCOT) "in process" unit;
 - vi. Fischer-Tropsch process unit;

- b. The Best Available Technology (BAT) requirements established under ORC rule 3704.03(T) apply to sulfur dioxide (SO₂) emissions from this emissions unit and have been determined to be compliance with the 23.1 tons SO₂ per rolling, 12-month period limitation established under OAC rule 3745-31-05(D).
- c. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) for the nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter 10 microns or less in size (PM₁₀), and volatile organic compounds (VOC) emissions from this emissions unit have been determined to be the compliance with the startup and shutdown restrictions established under OAC rule 3745-31-05(D).

These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

- d. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO_x, CO, PM₁₀, and VOC emissions from this air contaminant source since the uncontrolled potential to emit for NO_x, CO, PM₁₀, and VOC is each less than 10 tons/year.

These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) as part of the Ohio SIP.

- e. This permit establishes the following federally enforceable emission limitations for the purpose of limiting potential to emit (PTE) to avoid Prevention of Significant Deterioration (PSD) and Title V permitting requirements. The federally enforceable emission limitations are based on the operational restriction contained in c)(1):



- i. SO2 emissions from emissions unit P005 shall not exceed 23.1 tons per rolling 12-month period (from the startup and shutdowns).

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing federally enforceable requirements which limit PTE [See b)(2)e]:
 - a. All process emissions from the operation of this emissions unit, including startups* and shutdowns** shall be directed to a thermal oxidizer (TO) achieving a 98% destruction efficiency for VOC and meeting a maximum CO emission rate of 8.93 lb/hr;
 - b. the maximum number of startup events for this emissions unit shall not exceed 4 per rolling, 12-month period; and
 - c. the maximum number of shutdown events for this emissions unit shall not exceed 4 per rolling, 12-month period.

*Startup involves the following emission generation stages before the gasification process obtains normal routine operations:

- (1) preheating of the first gasification unit that comes online using natural gas;
- (2) venting of raw syngas from gasification unit;
- (3) venting of clean syngas from AGR unit;
- (4) venting of tail gas from SRU.

**Shutdown involves the following emission generation stages before the gasification process:

- (1) venting of clean syngas from Fischer-Tropsch process unit;
- (2) venting of gas from AGR unit;
- (3) venting of raw syngas from a gasification unit.

- (2) To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the startup and shutdown values specified in the following table:

Months	Maximum Cumulative Allowable Startups	Maximum Cumulative Allowable Shutdowns
1-2	2	2
1-3	3	3
1-4	4	4



Months	Maximum Cumulative Allowable Startups	Maximum Cumulative Allowable Shutdowns
1-12	4	4

After the first 12 calendar months of operation, compliance with the annual operational restrictions shall be based upon a rolling, 12-month summation of the startups and shutdowns.

- (3) The permittee shall burn only pipeline quality natural gas in the startup pre heater for this emissions unit.

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

- (1) The permittee shall maintain monthly records of the following information:
 - a. the number of startups per month;
 - b. during the first 12 calendar months of operation, the cumulative number of startups for each calendar month;
 - c. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the number of startups;
 - d. the calculated emissions of SO₂, in tons, for each startup event;.
 - e. the number of shutdowns per month;
 - f. during the first 12 calendar months of operation, the cumulative number of shutdowns for each calendar month;
 - g. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the number of shutdowns;
 - h. the calculated emissions of SO₂, in tons, for each shutdown event;
 - i. during the first 12 calendar months of operation, the cumulative SO₂ emissions, in tons, from startups and shutdowns (summation of d)(1)d. and d)(1)h.
 - j. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of SO₂ emissions, in tons, from startups and shutdowns.
- (2) The permittee shall properly install, operate, and maintain equipment to continuously monitor and record the combustion temperature within the thermal oxidizer during operation of this emissions unit. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the combustion temperature within the thermal oxidizer on a continuous basis.



Whenever the monitored value for the combustion temperature deviates from the minimum value specified by the manufacturer, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date(s) the investigation was conducted;
- d. the names of the personnel who conducted the investigation; and,
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable value specified below, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- f. a description of the corrective action;
- g. the date it was completed;
- h. the date and time the deviation ended;
- i. the total period of time (in minutes) during which there was a deviation;
- j. the combustion temperature within the thermal oxidizer immediately after the corrective action; and,
- k. the names of the personnel who performed the work.

Investigation and records required by this paragraph does not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The temperature limit is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the permitted temperature limit based upon information obtained during future performance tests that demonstrate compliance with the allowable emission rate(s) for the controlled pollutant(s). In addition, approved revisions to the temperature limit will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of a minor permit modification.

- (3) For each time period during which TOwas not in operation during the operation of this emissions unit, including startups and shutdowns [see c)(1)], the permittee shall maintain a record of the type of event and the duration in hours of each event.



- (4) For each day during which the permittee burns a fuel other than pipeline quality natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- 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:
 - i. for the first 12 calendar months of operation following the issuance of this permit, the number of startups and shutdowns; and
 - ii. after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month number of startups and shutdowns.

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.

- (2) The permittee shall submit quarterly reports that identify the following information concerning the operation of the thermal oxidizer during the operation of this emissions unit:
- a. all periods of time during which the combustion temperature within the thermal oxidizer, when the emissions unit was in operation, was below the temperature specified by the manufacturer.
 - b. an identification of each incident of deviation described in (a) where a prompt investigation was not conducted;
 - c. an identification of each incident of deviation described in (a) where prompt corrective action, that would bring the combustion temperature into compliance with the acceptable range, was determined to be necessary and was not taken;
 - d. an identification of each incident of deviation described in (a) where proper records were not maintained for the investigation and/or the corrective action; and
 - e. each time period during which TO was not in operation during the operation of this emissions unit, including startups and shutdowns, as specified in c)(1).

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.

- (3) These 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), October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (4) 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.
- (5) 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 District Office or Local Air Agency, 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.

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:
 - a. Emission Limitation:

SO₂ emissions shall not exceed 3.84 tons per startup and 5.82 tons per shutdown

Applicable Compliance Method:

The emission limitations were developed by applying conservative methodologies/calculations for estimating the worst case emissions from these processes, as seen contained in the permittee's application, number A0048567. If required, the permittee shall demonstrate compliance in accordance with USEPA approved test methods.
 - b. Emission Limitations:

23.1 tons SO₂/rolling, 12-month period (from the startup and shutdowns)



Applicable Compliance Method:

Compliance with the rolling, 12-month emission limitation shall be demonstrated through the record keeping requirements specified in section d)(1) of this permit.

c. Emission Limitation:

All process emissions from the operation of this emissions unit, including startups* and shutdowns** shall be directed to a thermal oxidizer (TO) achieving a 98% destruction efficiency for VOC and meeting a maximum CO emission rate of 8.93 lb/hr;

Applicable Compliance Method:

The emission limitations were developed by applying conservative methodologies/calculations for estimating the worst case emissions from these processes, as seen contained in the permittee's application, number A0048567. If required, the permittee shall demonstrate compliance in accordance with USEPA approved test methods.

g) Miscellaneous Requirements

(1) None.



3. Emissions Unit Group -dryers: P010,P011,P012,P013,

EU ID	Operations, Property and/or Equipment Description
P010	Roller Drying Mill 1
P011	Roller Drying Mill 2
P012	Roller Drying Mill 3
P013	Roller Drying Mill 4

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. b)(1)c and b)(2)c.

(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(F)	<u>Material handling operations for each individual emissions unit:</u> 0.0015 grain particulate matter 10 microns or less in size (PM ₁₀) per dry standard cubic foot (dscf), 1.47 tons PM ₁₀ /yr Visible particulate emissions (PE) shall not exceed 5 percent opacity, as a six minute average. See b)(2)a and c)(1).
b.	OAC rule 3745-31-05(A)(3), as effective 6/30/08	See b)(2)b.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 6/30/08	See b)(2)c.
d.	OAC rule 3745-17-11(B)	See b)(2)d.
e.	OAC rule 3745-17-07(A)	See b)(2)d.
f.	40 CFR Par 60 Subpart Y	0.01 grain PE/dscf See b)(2)e.
g.	OAC rule 3745-18-06	See b)(2)f.

(2) Additional Terms and Conditions

a. This permit establishes the following legally and practically enforceable emission limitations for the purpose of limiting potential to emit (PTE) from the material handling operations. The legally and practically enforceable emission limitations are voluntary restrictions established under OAC rule 3745-31-05(F) and are based on the operational restrictions contained in c)(1) which requires the use of a baghouse:

- i. 0.0015 gr PM₁₀ /dscf;
- ii. 1.47 tons PM₁₀ /year; and
- iii. Visible PE shall not exceed 5% opacity, as a six-minute average.

For PTE purposes all emissions of particulate matter are considered to be 2.5 microns or less in size (PM_{2.5}).

b. Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) for the PM₁₀ emissions from this emissions unit have been determined to be compliance with the requirement for the installation of a baghouse designed to achieve a maximum outlet concentration of 0.0015 gr/dscf of PM₁₀, established in accordance with OAC rule 3745-31-05(F) for the drying/material handling operations. The BAT requirements for the nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), and volatile organic compounds (VOC) emissions from this emissions unit have been determined to be compliance with the requirement to use pipeline quality natural gas as specified in condition c)(2).

These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

It should be noted that the requirements established pursuant to OAC rule 3745-31-05(F) will remain applicable after the above SIP revisions are approved by U.S. EPA.

c. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM₁₀, SO₂, NO_x, CO and VOC emissions from this air contaminant source since



the uncontrolled potential to emit for PM₁₀, SO₂, NO_x, CO and VOC is each less than 10 tons/year.

These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) as part of the Ohio SIP.

- d. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F).
- e. This emissions unit is subject to the requirements of 40 CFR Part 60, Subpart Y when processing coal. The emission limitation specified by 40 CFR Part 60, Subpart Y is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(F). [Pursuant to 40 CFR 60.252(1)(i), the PM limit from each thermal dryer shall not exceed 0.01 gr/dscf and 10% opacity. No SO₂ and NO_x limits are established per 40 CFR Part 60, Subpart Y, pursuant to 60.252(b)(2)(iii) and 60.252(b)(3)(iii), respectively.]
- f. The emissions units are exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A)(3).

c) Operational Restrictions

- (1) The following operational restrictions have been included in this permit for the purpose of establishing the following legally and practically enforceable requirements which limit PTE: [See b)(2)a.]
 - a. Emissions units P010, P011, P012, and P013 shall each be controlled by a baghouse with a maximum outlet concentration of 0.001 gr/dscf for PM₁₀.
- (2) The permittee shall burn only pipeline quality natural gas in the dryers in these emissions units.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the baghouse stacks serving these emissions units. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. the total duration of any visible emission incident; and
 - c. any corrective actions taken to minimize or eliminate the visible emissions.
- (2) The permittee shall install, calibrate, maintain, and continuously operate a monitoring device for the measurement of the temperature of the gas stream at the exit of the thermal dryers. The monitoring device is to be certified by the manufacturer to be accurate within ± 1.7 °C (± 3 °F).



- (3) For each day during which the permittee burns a fuel other than pipeline quality natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall additionally identify the following information in the annual PER in accordance with the monitoring requirements in section d)(1):
 - a. all days during which any visible particulate emissions were observed from the stack(s) serving this emissions unit; and
 - b. describe any corrective actions taken to minimize or eliminate the visible particulate emissions.

The above information shall be provided as an attachment to the PER. If there were no day(s) and/or corrective action(s) to identify as required above, the permittee shall indicate within the "Additional Information and Corrections" section of the PER that no visible emissions were observed and no corrective actions were taken.

- (3) 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 District Office or Local Air Agency, 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.

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for emissions units P010, P011, P012, and P013 in accordance with the following requirements:
 - a. The emission testing shall be conducted within 60 days after achieving the maximum production rate that the emissions unit will be operated, but no later than 180 days after the initial startup of each emission unit.



- b. The permittee may request that a single performance test for one of the above emissions unit be used to demonstrate that the group of emissions units are in compliance with the applicable emissions standards provided that the permittee meets all of the conditions specified in 40 CFR Part 62.252 paragraphs (e)(1) through (3).
- c. The emission testing shall be conducted to demonstrate compliance with the following emission rates:
 - i. 0.0015 grains PM₁₀/dscf
 - ii. Visible PE shall not exceed 5 percent opacity, as a six minute average.
 - iii. 0.01 grain PE/dscf
- d. The following test methods shall be employed to demonstrate compliance with the above emission limitations:
 - i. for PM₁₀, Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M:
 - ii. for PE, Method 5 of 40 CFR part 60, Appendix A,
 - iii. for opacity, Method 9 of appendix A-4 of this part and the procedures in §60.11 must be used to determine opacity, in conjunction with the following requirements:

The duration of the Method 9 of appendix A-4 of this part performance test shall be 1 hour (ten 6-minute averages).

If, during the initial 30 minutes of the observation of a Method 9 of appendix A-4 of this part performance test, all of the 6-minute average opacity readings are less than or equal to half the applicable opacity limit, then the observation period may be reduced from 1 hour to 30 minutes.
- e. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.
- f. The test(s) shall be conducted at a Maximum Source Operating Rate (MSOR), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. MSOR is defined as the condition that is most likely to challenge the emission control measures with regards to meeting the applicable emission standard(s). Although it generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test at the MSOR is justification for not accepting the test results as a demonstration of compliance.
- g. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and



procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, NWDO's refusal to accept the results of the emission test(s).

Personnel from the Ohio EPA, NWDO shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

h. The frequency of any future testing shall be done in accordance with the requirements specified in 40 CFR Part 62.252.

(2) 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:

a. Emission Limitation:

0.0015 gr PM₁₀ /dscf

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation in accordance with the testing requirements specified in section f)(1) of this permit.

b. Emission Limitation:

1.47 tons PM₁₀ /yr

Applicable Compliance Method:

The tons per year emission limitation was developed by multiplying the emission limitation of 0.0015 gr PM₁₀ /dscf by the maximum volumetric flow rate (26086 scfm), the maximum operating schedule of 8760 hours/year and applying the conversion factors of 60 minutes/hour, 2000 lbs/ton and 7000 grains/pound. Therefore, provided compliance is shown with the emission limitation of 0.0015 gr PM₁₀ /dscf, compliance with the annual limitation shall also be demonstrated.

c. Emission Limitation:

Visible particulate matter shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method:

The permittee shall demonstrate compliance with the emission limitation in accordance with the testing requirements specified in section f)(1) of this permit.



d. Emission Limitation:

0.049 lb NOx/mmBtu heat input

Applicable Compliance Method:

The above heat input limitation was established based on the burner vendor guarantees for the use of low NOx burners. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 – 4 and 7 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.