State of Ohio Environmental Protection Agency

RE: PERMIT TO INSTALL **CERTIFIED MAIL**
LUCAS COUNTY

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

Application No: 04-1166

DATE: June 3, 1999

Marsulex, Inc
Duane S. Abbott
6800 W. Central Ave., Suite L-1
Toledo, OH 43617-1135

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, buy 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 by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
Toledo Div of Env Services

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install Terms and Conditions

Issue Date: June 3, 1999
Effective Date: June 3, 1999

PERMIT TO INSTALL 04-1166

Application Number:	04-1166
APS Premise Number:	0448020014
Permit Fee:	**$800.00**
Name of Facility:	Marsulex, Inc
Person to Contact:	Duane S. Abbott
Address:	6800 W. Central Ave., Suite L-1 Toledo, OH 43617-1135

Location of proposed air contaminant source(s) [emissions unit(s)]:
1400 Otter Creek Road
Oregon, OHIO

Description of proposed emissions unit(s):
TWO NATURAL GAS-FIRED PRE-HEATERS.

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

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

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

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule

3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written 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.) See B.14 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

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

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:

i. Compliance certifications shall be submitted on an annual basis unless the applicable requirement specifies more frequent submissions.

ii. Compliance certifications shall include the following:

aa. An identification of each term or condition of this permit that is the basis of the certification.

ab. The permittee's current compliance status.

ac. Whether compliance was continuous or intermittent.

ad. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

ae. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

10. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or

upset provision contained in any applicable requirement.

11. Title V Permit To Operate Application

Pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit.

B. State Only Enforceable 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 Related to Monitoring and Recordkeeping 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 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 are inadequate 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 prove to be inadequate 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 application must be made to the Director for the installation or modification of any other emissions unit(s).

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.

13. 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.

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

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

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

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

Pollutant	Tons Per Year
CO	13.1
$N0_x$	7.8
$S0_2$	0.09
PM	0.30
VOC	0.86

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

None.

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

None.

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Plant A pre-heater/ 19 MMBtu/hr natural gas-fired heater	OAC rule 3745-17-07(A)(1)	20% opacity as a 6-minute average, unless otherwise specified by the rule.
	OAC rule 3745-17-10(B)	0.020 pound particulates per million Btu of heat input

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

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

IV. Reporting Requirements

1. The permittee shall submit semi-annual deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted by January 30 and July 30 of each year and shall cover the previous 6 calendar months of operation.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

a. Emission Limitation

20% opacity as a six-minute average

Applicable Compliance Method

The exclusive combustion of natural gas as determined through the record keeping requirements, III.A.III.1., shall be considered adequate demonstration of compliance with this emission limit. If required, compliance shall also be determined by Method 9 of 40 CFR Part 60, Appendix A.

b. Emission Limitation

0.020 pound particulates per million Btu of heat input

Applicable Compliance Method

The exclusive combustion of natural gas as determined through the record keeping requirements, III.A.III.1., shall be considered adequate demonstration of compliance with this emission limit. If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in OAC rule 3745-17-03(B)(9).

VI. Miscellaneous Requirements

None.

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Plant A pre-heater/ 19 MMBtu/hr natural gas-fired heater	OAC rule 3745-31-05	1.6 pounds per hour and 7.0 tons per year carbon monoxide; 0.95 pound per hour and 4.2 tons per year nitrogen oxides; 0.04 pound per hour and 0.16 ton per year particulates; 0.01 pound per hour and 0.05 ton per year sulfur dioxide; 0.10 pound per hour and 0.46 ton per year volatile organic compounds.
	OAC rule 3745-21-07(B)	See III.B.I.2.a
	OAC rule 3745-21-08(B)	See III.B.I.2.a
	OAC rule 3745-23-06(B)	See III.B.I.2.a

2. Additional Terms and Conditions

2.a This limitation is equivalent to the limitation established by OAC rule 3745-31-05.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I. of these terms and conditions shall be determined in accordance with the following method(s):

   a. Emission Limitation

   1.6 pounds per hour and 7.0 tons per year carbon monoxide

   Applicable Compliance Method

   The exclusive combustion of natural gas as determined through the record keeping requirements of III.A.III.1. shall be considered adequate demonstration of compliance with these emissions limits. This determination is based on an AP-42 emission factor from Table 1.4-1 (dated 2/98) of 84 pounds carbon monoxide per million cubic feet of natural gas burned and the maximum gas usage of 0.019 million cubic feet per hour. Since the annual limit is based on the maximum fuel usage for 8760 hours per year, compliance with the pound per hour limit constitutes compliance with the ton per year limit.

   If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Method 10 of 40 CFR Part 60, Appendix A, or other method approved by Ohio EPA.

   b. Emission Limitation

   0.95 pound per hour and 4.2 tons per year nitrogen oxides

   Applicable Compliance Method

   The exclusive combustion of natural gas as determined through the record keeping requirements of III.A.III.1. shall be considered adequate demonstration of compliance with these emissions limits. This determination is based in an AP-42 emission factor from Table 1.4-1 (dated 2/98) of 50 pounds nitrogen oxides per million cubic feet of natural gas burned and the maximum gas usage of 0.019 million cubic feet per hour. Since the annual limit was based on the maximum fuel usage for 8760 hours per year, compliance with the pound per hour limit constitutes compliance with the ton per year limit.

If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Method 7 of 40 CFR Part 60, Appendix A, or other method approved by Ohio EPA.

c. Emission Limitation

0.04 pound per hour and 0.16 ton per year particulates

Applicable Compliance Method

The exclusive combustion of natural gas as determined through the record keeping requirements of III.A.III.1. shall be considered adequate demonstration of compliance with these emissions limits. This determination is based on an AP-42 emission factor from Table 1.4-2 (dated 2/98) of 1.9 pounds particulates per million cubic feet of natural gas burned and the maximum gas usage of 0.019 million cubic feet per hour. Since the annual limit was based on the maximum fuel usage for 8760 hours per year, compliance with the pound per hour limit constitutes compliance with the ton per year limit.

If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Method 5 of 40 CFR Part 60, Appendix A, or other method approved by Ohio EPA.

d. Emission Limitation

0.01 pound per hour and 0.05 ton per year sulfur dioxide

Applicable Compliance Method

The exclusive combustion of natural gas as determined through the record keeping requirements of III.A.III.1. shall be considered adequate demonstration of compliance with these emissions limits. This determination is based on an AP-42 emission factor from Table 1.4-2 (dated 2/98) of 0.6 pounds sulfur dioxide per million cubic feet of natural gas burned and the maximum gas usage of 0.019 million cubic feet per hour. Since the annual limit was based on the maximum fuel usage for 8760 hours per year, compliance with the pound per hour limit constitutes compliance with the ton per year limit.

If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Method 6 of 40 CFR Part 60, Appendix A, or other method approved by Ohio EPA.

e. Emission Limitation

0.10 pound per hour and 0.46 ton per year volatile organic compounds

Applicable Compliance Method

The exclusive combustion of natural gas as determined through the record keeping requirements of III.A.III.1. shall be considered adequate demonstration of compliance with these emissions limits. This determination is based on an AP-42 emission factor from Table

1.4-2 (dated 2/98) of 5.5 pounds volatile organic compounds per million cubic feet of natural gas burned and the maximum gas usage of 0.019 million cubic feet per hour. Since the annual limit was based on the maximum fuel usage for 8760 hours per year, compliance with the pound per hour limit constitutes compliance with the ton per year limit.

If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Method 25 of 40 CFR Part 60, Appendix A, or other method approved by Ohio EPA.

VI. Miscellaneous Requirements

None.

Emissons Unit ID: **B002**

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

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Plant B pre-heater/ 16.5 MMBtu/hr natural gas-fired heater	OAC rule 3745-17-07(A)(1)	20% opacity as a 6-minute average, unless otherwise specified by the rule.
	OAC rule 3745-17-10(B)	0.020 pound particulates per million Btu of heat input

2. Additional Terms and Conditions

2.a None.

II. Operational Restrictions

1. The permittee shall burn only natural gas in this emissions unit.

III. Monitoring and/or Recordkeeping Requirements

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

IV. Reporting Requirements

1. The permittee shall submit semi-annual deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted by January 30 and July 30 of each year and shall cover the previous 6 calendar months of operation.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be

determined in accordance with the following method(s):

a. Emission Limitation

20% opacity as a six-minute average

Applicable Compliance Method

The exclusive combustion of natural gas as determined through the record keeping requirements, III.A.III.1., shall be considered adequate demonstration of compliance with this emission limit. If required, compliance shall also be determined by Method 9 of 40 CFR Part 60, Appendix A.

b. Emission Limitation

0.020 pound particulates per million Btu of heat input

Applicable Compliance Method

The exclusive combustion of natural gas as determined through the record keeping requirements, III.A.III.1., shall be considered adequate demonstration of compliance with this emission limit. If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in OAC rule 3745-17-03(B)(9).

VI. Miscellaneous Requirements

None.

June 3, 1999

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
Plant A pre-heater/ 19 MMBtu/hr natural gas-fired heater	OAC rule 3745-31-05	1.4 pounds per hour and 6.1 tons per year carbon monoxide; 0.83 pound per hour and 3.6 tons per year nitrogen oxides; 0.03 pound per hour and 0.14 ton per year particulates; 0.01 pound per hour and 0.04 ton per year sulfur dioxide; 0.09 pound per hour and 0.40 ton per year volatile organic compounds.
	OAC rule 3745-21-07(B)	See III.B.I.2.a
	OAC rule 3745-21-08(B)	See III.B.I.2.a
	OAC rule 3745-23-06(B)	See III.B.I.2.a

2. Additional Terms and Conditions

2.a This limitation is equivalent to the limitation established by OAC rule 3745-31-05.

II. Operational Restrictions

None.

III. Monitoring and/or Recordkeeping Requirements

None.

IV. Reporting Requirements

None.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I. of these terms and conditions shall be determined in accordance with the following method(s):

   a. Emission Limitation

      1.4 pounds per hour and 6.1 tons per year carbon monoxide

      Applicable Compliance Method

      The exclusive combustion of natural gas as determined through the record keeping requirements of III.A.III.1. shall be considered adequate demonstration of compliance with these emissions limits. This determination is based on an AP-42 emission factor from Table 1.4-1 (dated 2/98) of 84 pounds carbon monoxide per million cubic feet of natural gas burned and the maximum gas usage of 0.0165 million cubic feet per hour. Since the annual limit is based on the maximum fuel usage for 8760 hours per year, compliance with the pound per hour limit constitutes compliance with the ton per year limit.

      If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Method 10 of 40 CFR Part 60, Appendix A, or other method approved by Ohio EPA.

   b. Emission Limitation

      0.83 pound per hour and 3.6 tons per year nitrogen oxides

      Applicable Compliance Method

      The exclusive combustion of natural gas as determined through the record keeping requirements of III.A.III.1. shall be considered adequate demonstration of compliance with these emissions limits. This determination is based on an AP-42 emission factor from Table 1.4-1 (dated 2/98) of 50 pounds nitrogen oxides per million cubic feet of natural gas

burned and the maximum gas usage of 0.0165 million cubic feet per hour. Since the annual limit was based on the maximum fuel usage for 8760 hours per year, compliance with the pound per hour limit constitutes compliance with the ton per year limit.

If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Method 7 of 40 CFR Part 60, Appendix A, or other method approved by Ohio EPA.

c. Emission Limitation

0.03 pound per hour and 0.14 ton per year particulates

Applicable Compliance Method

The exclusive combustion of natural gas as determined through the record keeping requirements of III.A.III.1. shall be considered adequate demonstration of compliance with these emissions limits. This determination is based on an AP-42 emission factor from Table 1.4-2 (dated 2/98) of 1.9 pounds particulates per million cubic feet of natural gas burned and the maximum gas usage of 0.0165 million cubic feet per hour. Since the annual limit was based on the maximum fuel usage for 8760 hours per year, compliance with the pound per hour limit constitutes compliance with the ton per year limit.

If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Method 5 of 40 CFR Part 60, Appendix A, or other method approved by Ohio EPA.

d. Emission Limitation

0.01 pound per hour and 0.04 ton per year sulfur dioxide

Applicable Compliance Method

The exclusive combustion of natural gas as determined through the record keeping requirements of III.A.III.1. shall be considered adequate demonstration of compliance with these emissions limits. This determination is based on an AP-42 emission factor from Table 1.4-2 (dated 2/98) of 0.6 pounds particulates per million cubic feet of natural gas burned and the maximum gas usage of 0.0165 million cubic feet per hour. Since the annual limit was based on the maximum fuel usage for 8760 hours per year, compliance with the pound per hour limit constitutes compliance with the ton per year limit.

If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Method 6 of 40 CFR Part 60, Appendix A, or other method approved by Ohio EPA.

e. Emission Limitation

0.09 pound per hour and 0.40 ton per year volatile organic compounds

Applicable Compliance Method

The exclusive combustion of natural gas as determined through the record keeping requirements of III.A.III.1. shall be considered adequate demonstration of compliance

with these emissions limits. This determination is based on an AP-42 emission factor from Table 1.4-2 (dated 2/98) of 5.5 pounds volatile organic compounds per million cubic feet of natural gas burned and the maximum gas usage of 0.0165 million cubic feet per hour. Since the annual limit was based on the maximum fuel usage for 8760 hours per year, compliance with the pound per hour limit constitutes compliance with the ton per year limit.

If required, the permittee shall also demonstrate compliance through performance testing in accordance with the methods and procedures provided in Method 25 of 40 CFR Part 60, Appendix A, or other method approved by Ohio EPA.

VI. Miscellaneous Requirements

None.