



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

6/25/2015

Mrs. Mary Nydam
DTE St. Bernard, LLC
414 S. Main Street Suite 600
Ann Arbor, MI 48104

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1431394148
Permit Number: P0118759
Permit Type: OAC Chapter 3745-31 Modification
County: Hamilton

Certified Mail

| | |
|-----|------------------------------------|
| No | TOXIC REVIEW |
| No | PSD |
| No | SYNTHETIC MINOR TO AVOID MAJOR NSR |
| Yes | CEMS |
| No | MACT/GACT |
| Yes | NSPS |
| No | NESHAPS |
| No | NETTING |
| No | MAJOR NON-ATTAINMENT |
| No | MODELING SUBMITTED |
| No | MAJOR GHG |
| No | SYNTHETIC MINOR TO AVOID MAJOR GHG |

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. 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 PTI 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 Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: U.S. EPA
SWOAQA; Indiana; Kentucky



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
DTE St. Bernard, LLC**

Facility ID: 1431394148
Permit Number: P0118759
Permit Type: OAC Chapter 3745-31 Modification
Issued: 6/25/2015
Effective: 6/25/2015



Division of Air Pollution Control
Permit-to-Install
for
DTE St. Bernard, LLC

Table of Contents

| | |
|--|----|
| Authorization | 1 |
| A. Standard Terms and Conditions | 3 |
| 1. Federally Enforceable Standard Terms and Conditions | 4 |
| 2. Severability Clause | 4 |
| 3. General Requirements | 4 |
| 4. Monitoring and Related Record Keeping and Reporting Requirements..... | 5 |
| 5. Scheduled Maintenance/Malfunction Reporting | 6 |
| 6. Compliance Requirements | 6 |
| 7. Best Available Technology | 7 |
| 8. Air Pollution Nuisance | 8 |
| 9. Reporting Requirements | 8 |
| 10. Applicability | 8 |
| 11. Construction of New Sources(s) and Authorization to Install | 8 |
| 12. Permit-To-Operate Application | 9 |
| 13. Construction Compliance Certification | 10 |
| 14. Public Disclosure | 10 |
| 15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations | 10 |
| 16. Fees..... | 10 |
| 17. Permit Transfers | 10 |
| 18. Risk Management Plans | 10 |
| 19. Title IV Provisions | 10 |
| B. Facility-Wide Terms and Conditions..... | 11 |
| C. Emissions Unit Terms and Conditions | 13 |
| 1. B045, Boiler PB2..... | 14 |



Final Permit-to-Install
DTE St. Bernard, LLC
Permit Number: P0118759
Facility ID: 1431394148
Effective Date: 6/25/2015

Authorization

Facility ID: 1431394148
Facility Description: Facility produces process steam for various independent manufacturing facilities. Previously part of the Procter and Gamble Ivorydale complex.
Application Number(s): A0053141
Permit Number: P0118759
Permit Description: Modification to emissions unit B045 to allow combustion of fuel oil during periods of natural gas curtailment or supply interruption. As part of this application, DTE is also requesting updates to the synthetic minor operational restriction and compliance demonstration in PTI 14-05541 in order to account for the combustion of fuel oil; however, DTE is not requesting changes to the existing annual synthetic minor emission limits (i.e., tons per rolling, 12-month summations).
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$500.00
Issue Date: 6/25/2015
Effective Date: 6/25/2015

This document constitutes issuance to:

DTE St. Bernard, LLC
5189 Spring Grove Avenue
Cincinnati, OH 45217

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

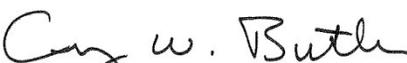
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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

The above named entity is hereby granted a Permit-to-Install for the 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 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


Craig W. Butler
Director



Final Permit-to-Install
DTE St. Bernard, LLC
Permit Number: P0118759
Facility ID: 1431394148
Effective Date:6/25/2015

Authorization (continued)

Permit Number: P0118759
Permit Description: Modification to emissions unit B045 to allow combustion of fuel oil during periods of natural gas curtailment or supply interruption. As part of this application, DTE is also requesting updates to the synthetic minor operational restriction and compliance demonstration in PTI 14-05541 in order to account for the combustion of fuel oil; however, DTE is not requesting changes to the existing annual synthetic minor emission limits (i.e., tons per rolling, 12-month summations).

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

| | |
|-----------------------------------|----------------|
| Emissions Unit ID: | B045 |
| Company Equipment ID: | Boiler PB2 |
| Superseded Permit Number: | 14-05541 |
| General Permit Category and Type: | Not Applicable |



Final Permit-to-Install
DTE St. Bernard, LLC
Permit Number: P0118759
Facility ID: 1431394148
Effective Date:6/25/2015

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) 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 re-issuance, or modification.

- 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, 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 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.

4. Monitoring and Related Record Keeping 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:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) 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:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Southwest Ohio Air Quality Agency.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, 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 made to the Southwest Ohio Air Quality Agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Southwest Ohio Air Quality Agency every six months, by January 31 and July 31 of each year for the previous six calendar months. 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.
 - (4) This permit is for an emissions unit located at a Title V facility. 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.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Southwest Ohio Air Quality 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 shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

- a) 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 appropriate Ohio EPA District Office or contracted

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 electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

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:
- (1) 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.
 - (2) 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 ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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 Southwest Ohio Air Quality 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:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Southwest Ohio Air Quality 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 state-only required 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 Southwest Ohio Air Quality 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, 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.)

10. 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) not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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 permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit 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. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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 by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. 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.

19. 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.



Final Permit-to-Install
DTE St. Bernard, LLC
Permit Number: P0118759
Facility ID: 1431394148
Effective Date: 6/25/2015

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units B022, B043 and B045 including any de minimus air contaminant sources, as defined in OAC rule 3745-15-05, and any permanent exemption air contaminant sources installed subsequent to the issuance of this permit shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
3. The permittee shall collect and record the following information each month for the emissions units identified in section B.2.:
 - a) The updated rolling, 12-month summation of the individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
 - b) The updated rolling, 12-month summation of the combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting the Southwest Ohio Air Quality Agency. This information does not have to be kept on an individual emissions unit basis.
4. Compliance with the HAP emission limitations cited in section B.2. shall be demonstrated by the recordkeeping in section B.3.
5. The permittee is advised that this facility may be subject to the "Generally Available Control Technology" (GACT) requirements under Title 40 of the Code of Regulations, Part 63, Subpart JJJJJJ, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial and Institutional Boilers Area Sources. At this time the Ohio EPA is not accepting the delegating authority to enforce the standards promulgated under the Urban Air Toxics Strategy. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this Subpart (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the appropriate Ohio EPA District Office or Local Air Agency.



Final Permit-to-Install
DTE St. Bernard, LLC
Permit Number: P0118759
Facility ID: 1431394148
Effective Date: 6/25/2015

C. Emissions Unit Terms and Conditions

1. B045, Boiler PB2

Operations, Property and/or Equipment Description:

165 mmBtu per hour natural gas fired low heat release steam generating boiler modification

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|--|---|
| a. | OAC rule 3745-31-05(A)(3) June 30, 2008 | The following emission limitations shall not be exceeded: 0.10 pound/mmBtu of nitrogen oxides (NOx) when firing natural gas; 0.12 pound/mmBtu of NOx when firing No. 2 fuel oil. 0.084 pound/mmBtu of carbon monoxide (CO) when firing natural gas; 0.091 pound/mmBtu of CO when firing No. 2 fuel oil. |
| b. | OAC rule 3745-31-05(A)(3) June 30, 2008 | The following emission limitations shall not be exceeded: 2.3 tons of particulate emissions (PE), particulate matter emissions less than 10 microns in diameter (PM10) and particulate matter emissions less than 2.5 microns in diameter (PM2.5) per per year as a rolling, 12-month summation. ** 0.2 tons of sulfur dioxide (SO2) per year as a rolling, 12-month summation. 3.4 tons of organic compounds (OC) per year as a rolling, 12-month summation. **Assume PE=PM10=PM2.5. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|---|---|
| | | See b)(2)a. below. |
| c. | OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008 | The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, PM10, PM2.5, SO2 and OC emissions from this air contaminant source since the potential to emit is less than 10 tons/year taking into account the federally enforceable restriction in b)(1)c. below. See b)(2)b. below. |
| d. | OAC rule 3745-31-05(D) June 30, 2008 | Annual emissions shall not exceed the following based on a rolling, 12-month summation: 30.6 tons per year NOx; 0.2 ton per year SO2; 25.7 tons per year CO; 3.4 tons per year OC; and 2.3. tons per year PE/PM10/PM2.5**. ** Assume PE=PM10=PM2.5. See B.2. and c)(2). |
| e. | OAC rule 3745-17-07(A)(1) | The emission limitation established in this rule is less stringent than that established under 40 CFR Part 60, Subpart Db. |
| f. | OAC rule 3745-17-10(B)(1) | PE shall not exceed 0.020 pound per million Btu of actual heat input. |
| g. | OAC rule 3745-18-06(A) | This emission unit is exempt from paragraphs (D), (F) and (G) of OAC rule 3745-18-06 and from rules 3745-18-07 to 3745-18-94 of the Administrative Code during any calendar day in which natural gas is the only fuel burned. |
| h. | OAC rule 3745-18-06(D) | Emissions of SO2 shall not exceed 1.6 lbs SO2 per million Btu actual heat input. |
| i. | OAC rule 3745-110-03(C) | The emission limitation established in this |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|----|-------------------------------|--|
| | | rule is the same as or less stringent than that established under OAC 3745-31-05(A)(3). |
| i. | 40 CFR Part 60 Subpart Db | See b)(2)c., c)(3), d)(2), d)(7) - d)(12), e)(5) – e)(7) and f)(1)h. |
| j. | 40 CFR 60.44b(l)(1) | The emission limitation established in this regulation is less stringent than that established under OAC 3745-110-03(C) and OAC rule 3745-31-05(A)(3). |

(2) Additional Terms and Conditions

- a. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except for one 6-minute period per hour of not more than 27 percent opacity.
- d. The permittee shall maintain a written quality assurance/quality control plan for the continuous NOx monitoring system, designed to ensure continuous valid and representative readings of NOx emissions in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous NOx monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.
- e. The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

- f. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- g. #2 diesel fuel burned in this emissions unit shall meet U.S. EPA's specifications for Ultra Low Sulfur Diesel (ULSD) found in 40 CFR 80.510(c).
- h. #2 diesel fuel delivered to the facility shall be stored only in dedicated vessels that are clearly identified for storage of #2 diesel fuel.

c) **Operational Restrictions**

- (1) The permittee shall burn only natural gas or No. 2 fuel oil in this emissions unit.
- (2) The total amount of natural gas burned(used) in this emissions unit shall not exceed 612.5 million cubic feet per year based upon a rolling, 12-month summation of the natural gas usage rates.
- (3) When burning oil,each steam generator meeting the following requirements shall not be required to be equipped with CEMS to measure SO₂ emissions or the associated CEMS for O₂ or CO₂:
 - a. the only fuel burned in the steam generator is very low sulfur oil or natural gas, as defined in 40 CFR 60.41b, and the records maintained for the fuel(s) burned meet the requirements of 40 CFR 60.49b(r)(1); or
 - b. weeklyfuel analyses are conducted for oil samples collected, in an as-fired condition at the inlet of the steam generating unit, and SO₂ emissions are calculated daily on a 30-day rolling basis.

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

- (1) For each day during which the permittee burns a fuel other than #2 diesel fuel or natural gas, the permittee shall maintain a record of the type, per cent sulfur content, and quantity of fuel burned in this emissions unit.
- (2) The permittee shall obtain and maintain fuel receipts (such as a current, valid purchase contract, tariff sheet, or transportation contract) from the fuel supplier that certify that the oil meets the definition of distillate oil and gaseous fuel meets the definition of natural gas as defined in §60.41b and the applicable sulfur limit.

The permittee shall maintain documents provided by the oil supplier for each shipment of #2 fuel oil to demonstrate compliance with the ULSD requirement. These documents must include the receipt or bill of lading that includes confirmation that the fuel meets the #2 diesel fuel ULSD standard.

- (3) The permittee shall maintain monthly records of the following information:
 - a. the total natural gas usage rate for each month;

- b. the total No. 2 fuel oil usage rate for each month; and
 - c. the rolling, 12-month summation of the natural gas usage (the summation of d)(2)a. for the current month's total and previous 11-months totals).
- (4) The permittee shall maintain on-site, the document of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous NOx monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2. The letter/document of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.
- (5) The permittee shall operate and maintain equipment to continuously monitor and record NOx emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

The permittee shall maintain records of all data obtained by the continuous NOx monitoring system including, but not limited to:

- a. emissions of NOx in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. emissions of NOx in units of the applicable standard(s) in the appropriate averaging period;
- c. results of quarterly cylinder gas audits;
- d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. hours of operation of the emissions unit, continuous NOx monitoring system, and control equipment;
- g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NOx monitoring system;
- h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NOx monitoring system; as well as,
- i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

- (6) The permittee shall maintain records of the following information for each operating day:
- a. calendar date;
 - b. the average hourly NO_x emission rates (expressed as NO₂) (ng/J or lb/MMBtu heat input) measured or predicted;
 - c. the 30-day average NO_x emission rates (ng/J or lb/MMBtu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days;
 - d. identification of the steam generating unit operating days when the calculated 30-day average NO_x emission rates are in excess of the NO_x emissions standards under §60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken;
 - e. identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken;
 - f. identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data;
 - g. identification of "F" factor used for calculations, method of determination, and type of fuel combusted;
 - h. identification of the times when the pollutant concentration exceeded full span of the CEMS;
 - i. description of any modifications to the CEMS that could affect the ability of the CEMS to comply with Performance Specification 2 or 3; and
 - j. results of daily CEMS drift tests and quarterly accuracy assessments as required under appendix F, Procedure 1 of this part.
- (7) The NO_x CEMS shall be certified through a performance evaluation conducted according to Performance Specification 2 and O₂ or CO₂ CEMS shall be certified through a performance evaluation conducted according to Performance Specification 3, both from Appendix B to Part 60. The CEMS shall be operated and data recorded during all periods of operation of the emissions unit including periods of startup, shutdown, malfunction, excluding CEMS breakdowns, repairs. Data shall be recorded during calibration checks, and zero and span adjustments. When relative accuracy testing for the CEMS is conducted, the NO_x concentration data and O₂ or CO₂ data shall be collected simultaneously.

Compliance with the NO_x emission standards is based on the arithmetic average of all hourly emission rates for 30 successive boiler operating days, as a 30-day rolling average. The hourly averages of the CEMS shall be calculated in accordance with 40 CFR 60.13(h)(2), with the exception that Ohio EPA requires CEMS readings to be taken

every minute, and the 1-minute readings are used for each 15 minute and/or 1 hour averages, used to calculate the daily average emissions; and emissions shall be expressed in ng/J or lb/MMBtu heat input. The 30-day average emission rate is calculated as the average of all hourly emissions data recorded by the CEMS.

If the permittee has installed and certified NO_x and O₂ or CO₂ CEMS according to the requirements of Part 75, and the CEMS continue to meet the ongoing quality assurance requirements of Part 75, the CEMS may be used to meet the requirements of Part 60 Subpart Db providing the following requirements are met:

- a. when relative accuracy testing is conducted, NO_x concentration data and O₂ (or CO₂) data are collected simultaneously;
- b. the CEMS meet the applicable NO_x and O₂ (or CO₂) relative accuracy specifications of Part 75;
- c. the relative accuracy standard of Performance Specification 2 in Appendix B to Part 60 is calculated on a lb/MMBtu basis;
- d. the NO_x and O₂ (or CO₂) data does not include substitute data values derived from the missing data procedures in Subpart D of Part 75; and
- e. the NO_x data has not been bias adjusted according to procedures identified in Part 75.
- f. the reporting requirements of 40 CFR 60.49b are met.

When NO_x emission data are not obtained because of breakdowns, repairs, calibration checks, and zero and span adjustments, emission data must be obtained by using standby monitoring systems, Method 7 or 7A of Appendix A to Part 60 or other approved reference methods to provide emissions data for a minimum of 75% of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive (rolling) steam generating unit operating days.

- (8) The permittee shall maintain a copy of the notification of the date of initial startup of the steam generating unit(s) required per 40 CFR 60.7. This notification would have included the following information, identified for each subject boiler, with any modification submitted (and a copy maintained) in a later report:
 - a. the design heat input capacity and identification of the fuels to be combusted in each steam generating unit subject to Part 60 Subpart Db;
 - b. if applicable, a copy of any federally enforceable requirement that limits the annual capacity factor of any steam generating unit for a fuel or mixture of fuels under 40 CFR 60.42b(d)(1); 60.43b(a)(2), 60.43b(a)(3)(iii), 60.43b(c)(2)(ii), 60.43b(d)(2)(iii); 60.44b(c), 60.44b(d), 60.44b(e), 60.44b(i), 60.44b(j), 60.44b(k); 60.45b(d), 60.45b(g), 60.46b(h), or 60.48b(i); and
 - c. the annual capacity factor at which each steam generating unit is anticipated to be operated, based on all the fuels fired and each individual fuel fired.

- (9) The permittee shall record and maintain records of the amounts of very low sulfur oil and natural gas combusted during each day and calculate the annual capacity factor individually for distillate oil and/or natural gas burned during the reporting period. The annual capacity factor shall be determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month.
- (10) The permittee shall obtain emission data for NO_x and either O₂ or CO₂ for at least 75% of the operating hours in at least 22 out of 30 successive boiler operating days. If the minimum data requirement cannot be met with a single monitoring system, the permittee shall supplement the emission data with other monitoring systems approved by the Administrator or the appropriate reference method from Appendix A to Part 60, i.e., Method 7, 7A, or 7E or Method 320 from Appendix A to Part 63.
- (13) If meeting the requirements of 40 CFR 60.48b(j), the permittee may conduct performance tests using Method 9 of Appendix A-4 to Part 60 and the procedures in 40 CFR 60.11. The following schedule shall be followed for visible emission observations, as determined by the most recent Method 9 performance test results:
- a. If no visible emissions are observed, a subsequent Method 9 performance test must be completed within 12 calendar months from the date that the most recent performance test was conducted or within 45 days of the next day that fuel with an opacity standard is combusted, whichever is later;
 - b. If visible emissions are observed but the maximum 6-minute average opacity is less than or equal to 5%, a subsequent Method 9 performance test must be completed within 6 calendar months from the date that the most recent performance test was conducted or within 45 days of the next day that fuel with an opacity standard is combusted, whichever is later;
 - c. If the maximum 6-minute average opacity is greater than 5% but less than or equal to 10%, a subsequent Method 9 performance test must be completed within 3 calendar months from the date that the most recent performance test was conducted or within 45 days of the next day that fuel with an opacity standard is combusted, whichever is later; or
 - d. If the maximum 6-minute average opacity is greater than 10%, a subsequent Method 9 performance test must be completed within 45 calendar days from the date that the most recent performance test was conducted.
- If during the initial 60 minutes of the observation all the 6-minute averages are less than 10% opacity and all the individual 15-second observations are less than or equal to 20%, then the observation period may be reduced from 3 hours to 60 minutes.
- (15) Where meeting the requirements (one of the options) of 40 CFR 60.48b(j), Method 9 of Appendix A of Part 60 may be used in accordance with the procedures in 40 CFR 60.11, to demonstrate compliance with the opacity standard using Method 9 of Appendix A-4 to Part 60. The following record shall be maintained for visible emissions readings:
- a. the dates and time intervals of all opacity observation periods;

- b. the name, affiliation, and copy of current visible emission reading certification for each visible emission observer participating in the performance test; and
 - c. copies of all visible emission observer opacity field data sheets.
- e) Reporting Requirements
- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. each day when a fuel other than natural gas or No. 2 fuel oil was burned in this emissions unit; and
 - b. all exceedances of the rolling, 12-month natural gas usage limitation of 612.5 million cubic feet.
- The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
- (3) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NOx monitoring system:
 - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of NOx emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapters 3745-14 and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
 - (4) These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - a. the facility name and address;
 - b. the manufacturer and model number of the continuous NOx and other associated monitors;
 - c. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;

- d. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
- e. the total NOx emissions for the calendar quarter (tons);
- f. the total operating time (hours) of the emissions unit;
- g. the total operating time of the continuous NOx monitoring system while the emissions unit was in operation;
- h. results and dates of quarterly cylinder gas audits;
- i. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- j. unless previously submitted, the results of any relative accuracy test audit showing the continuous NOx monitor out-of-control and the compliant results following any corrective actions;
- k. the date, time, and duration of any/each malfunction** of the continuous NOx monitoring system, emissions unit, and/or control equipment;
- l. the date, time, and duration of any downtime** of the continuous NOx monitoring system and/or control equipment while the emissions unit was in operation; and
- m. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

** each downtime and malfunction event shall be reported regardless of whether there is an exceedance of any applicable limit

- (5) The permittee shall submit excess emission reports for any exceedances that occurred during the reporting period.
 - a. each exceedance of the opacity standard in 40 CFR 60.43b(f); excess emissions are defined as all 6-minute periods during which the average opacity exceeds the opacity standards under 40 CFR 60.43b(f);
 - b. any omission of the monitoring requirements for operating parameter(s) required per 40 CFR 60.13(i)(1);

- c. any exceedance of the NO_x emission standards identified in 40 CFR 60.44b; excess emissions are defined as any calculated 30-day rolling average emission rate that exceeds the applicable emission limits;
 - d. the use of any fuel that exceeded 140 ng/J (0.32 lb/MMBtu) heat input and/or 0.30 weight percent sulfur; and
 - e. identification of each boiler operating day for which NO_x and/or diluent (O₂ or CO₂) data have not been obtained by an approved method for at least 75% of the operating hours in at least 22 out of the 30 successive (rolling) boiler operating days.
- (6) The permittee of a steam generating unit shall submit semiannual reports containing the following information for each steam generating unit:
- a. the beginning and ending dates of the 6-month compliance period;
 - b. the fuel(s) burned in each subject steam generating unit and the percent of the total operating hours each fuel was combusted in each unit during the 6-month reporting period;
 - c. each 30-day average NO_x emission rate (ng/J or lb/MMBtu heat input) measured during the reporting period, ending with the last 30-day period; the reasons for any noncompliance with the emission standards; and a description of any corrective actions taken;
 - d. identification of each steam generating unit operating day when the calculated 30-day average NO_x emission rates exceed the NO_x emissions standards under 40 CFR 60.44b; and the reasons for the excess emissions and a description of the corrective action(s) taken;
 - e. for an exceedance due to maintenance of the NO_x control system, the days on which the maintenance was performed and a description of the maintenance conducted;
 - f. identification of each steam generating unit operating day for which NO_x or diluent (O₂ or CO₂) data were not obtained by CEMS and/or an approved method for at least 75 percent of the operating hours in the steam generating unit operating day; the reason for not obtaining sufficient data; and description of the corrective action(s) taken;
 - g. identification of the times (date and duration) when emissions data have been excluded from the calculation of average emission rates; the reason for excluding data; and description of the corrective action(s) taken;
 - h. identification of the "F" factors used for calculations, the calculation(s) used or its source, and the fuels combusted;
 - i. identification of times (date and duration) when hourly averages have been obtained based on manual sampling methods and the Method(s) used;

- j. identification of the times when the pollutant concentration exceeded full span of the CEMS;
 - k. a description of any modifications to the CEMS that could affect the ability of the CEMS to comply with Performance Specification 2 or 3;
 - l. a summary of the results of daily CEMS drift tests and the results of the quarterly accuracy assessments, required under appendix F, Procedure 1 of this part; and
 - m. the annual capacity factor of each fuel fired, for each steam generating unit that is restricted by an annual capacity factor for a particular fuel.
- (7) Pursuant to the 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), including a description of each affected emissions unit, equipment manufacturer, and serial number of the equipment if available; and
 - c. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Southwest Ohio Air Quality Agency
250 William Howard Taft Road
Cincinnati, Ohio 45219

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 Limitations:

0.10 pound/mmBtu of nitrogen oxides (NOx) when firing natural gas
0.12 pound/mmBtu of NOx when firing No. 2 fuel oil
30.6 tons per year NOx

Applicable Compliance Method:

Ongoing compliance with the NOx emission limitations contained in this permit, 40 CFR Part 60 and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60.



If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

b. Emission Limitations:

0.084 pound/mmBtu of carbon monoxide (CO) when firing natural gas

0.091 pound/mmBtu of CO when firing No. 2 fuel oil.

25.7 tons per year CO

Applicable Compliance Method when burning natural gas:

Compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu.ft/hr.) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emission factor of 84 lbs of CO/mm cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (mm Btu/hr).

Applicable Compliance Method when burning No. 2 fuel oil:

Compliance may be determined by multiplying the maximum hourly No. 2 fuel oil burning capacity of the emissions unit (gallons/hr.) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 5/10) emission factor of 5 lbs. of CO/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (mm Btu/hr).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/MMBtu limitation specified in b)(1). Should the actual annual emission rate need to be calculated, the annual emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage information collected and recorded in d)(2).

c. Emission Limitation:

0.2 ton per year SO₂

Applicable Compliance Method when burning natural gas:

Compliance may be determined by multiplying the hourly gas burning capacity of the emissions unit (cubic feet per hour) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 0.6 lb. of SO₂/million cubic feet, multiplying by 8760 hours per year and then dividing by 2000).

Applicable Compliance Method when burning No. 2 fuel oil:

For No. 2 fuel oil, compliance shall be demonstrated using documents required in d)(2) above. Emissions of SO₂ from No. 2 fuel oil shall be calculated in accordance with OAC 3745-18-04(F)(2) using the maximum fuel sulfur content of 15 ppm. For all other liquid fuels, compliance shall be demonstrated using analytical results required in d)(2) above. Emissions of SO₂ from other liquid fuels shall be calculated in accordance with OAC 3745-18-04(F)(2). For natural gas, the emissions rate shall be 0.0 lb SO₂/MMBTU pursuant to 3745-18-04(F)(4).

If required, the permittee shall perform sulfur content analysis of a fuel sample in accordance with 40 CFR 580 using the appropriate ASTM method(s).

If required, the permittee shall demonstrate compliance with the emission limitations in accordance with USEPA reference Method 6, Method 6A, Method 6B, or Method 6C, whichever is appropriate, of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:

3.4 tons VOC per year

Applicable Compliance Method when burning natural gas:

Compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (cubic feet per hour) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 5.50 lbs. of VOC/million cubic feet of natural gas, multiplying by 8760 hours per year and then dividing by 2000).

Applicable Compliance Method when burning No. 2 fuel oil:

Compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr.) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-3 (revised 5/10) emission factor of 0.20 lb. of VOC/1000 gallons of fuel oil, multiplying by 8760 hours per year and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the emission limitations in accordance with Method 25, 40 CFR, Part 60, Appendix A.

e. Emission Limitations:

2.3 tons PE/PM₁₀/PM_{2.5} per year

Applicable Compliance Method when burning natural gas:

Compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (cubic feet per hour) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 7.6 lbs. of PE/PM₁₀/PM_{2.5} per million cubic feet, multiplying by 8760 hours per year and then dividing by 2000).

Applicable Compliance Method when burning No. 2 fuel oil:

Compliance may be determined by multiplying the maximum fuel oil burning capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 5/10) emission factor of 3.3 lbs. of PE/PM10/PM2.5 per 1000 gallons, multiplying by 8760 hours per year and then dividing by 2000).

If required, the permittee shall demonstrate compliance with the emission limitations in accordance with USEPA reference Method 1-5 of 40 CFR, Part 60, Appendix A.

f. Emission Limitation:

PE shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method when burning natural gas:

Compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu.ft/hr.) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emission factor of 7.6 lbs of PE/PM10/PM2.5/mm cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (mm Btu/hr).

Applicable Compliance Method when burning No. 2 fuel oil:

Compliance may be determined by multiplying the maximum fuel oil burning capacity of the emissions unit (gallons/hr.) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 5/10) emission factor of 3.3 lbs of PE/PM10/PM2.5/mm cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (mm Btu/hr).

If required, the permittee shall demonstrate compliance with the emission limitations in accordance with USEPA reference Method 1-5 of 40 CFR, Part 60, Appendix A.

g. Emission Limitation:

Emissions of SO₂ shall not exceed 1.6 lbs SO₂ per million Btu actual heat input.

Applicable Compliance Method when burning natural gas:

Compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu.ft/hr.) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 0.6 lbs of SO₂/mm cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (mm Btu/hr).

For #2 diesel, compliance shall be demonstrated using documents required in d)(2) above. Emissions of SO₂ from #2 diesel fuel shall be calculated in accordance with OAC 3745-18-04(F)(2) using the maximum fuel sulfur content of 15 ppm. For all other liquid fuels, compliance shall be demonstrated using

analytical results required in d)(2)] above. Emissions of SO₂ from other liquid fuels shall be calculated in accordance with OAC 3745-18-04(F)(2). For natural gas, the emissions rate shall be 0.0 lb SO₂/ MMBTU pursuant to 3745-18-04(F)(4).

If required, the permittee shall perform sulfur content analysis of a fuel sample in accordance with 40 CFR 580 using the appropriate ASTM method(s).

h. Emission Limitation:

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

Applicable Compliance Method:

The permittee shall demonstrate compliance with the opacity standard in accordance with 40 CFR 60.48b(a), as identified in the Monitoring and Recordkeeping section of this permit.

g) Miscellaneous Requirements

(1) None.