Ohio Environmental Protection Agency

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

10/21/2015

Certified Mail

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

Mr. Jan-Arthur Utrecht
University of Cincinnati
University of Cincinnati
P.O. Box 210218
Cincinnati, OH 45221-0218

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1431070849
Permit Number: P0119432
Permit Type: Administrative Modification
County: Hamilton

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Cincinnati Enquirer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted.Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now.If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

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

Cc: U.S. EPA Region 5 -*Via E-Mail Notification*
SWOAQA; Indiana; Kentucky

Permit Strategy Write-Up

1. Check all that apply:

   _X_ Synthetic Minor Determination

   Netting Determination

2. Source Description:
   The University of Cincinnati is a State of Ohio educational facility. The facility has boiler operations that supply steam and heat to the campus. This permit action is an administrative modification at the facilities request to implement federally enforceable operating restrictions for emissions unit B108, so that the boiler will qualify for "limited use" boiler under the Boiler MACT Subpart DDDDD. The facility has requested that the emissions be limited to 10% of the previous permit allowable.

3. Facility Emissions and Attainment Status:
   Actual facility wide emissions for UC for 2014 were 16.25 tons per year (TPY) of particulate emissions (PE), 8.34 TPY of particulate matter 10 microns or less in diameter (PM10), 402 TPY of SO2, 302 of NOx, 87.6 TPY of CO and 5.48 TPY of organic compounds (OC).

   This facility is located in Hamilton County which is designated as attainment for PE/PM10, SO2, NOx and CO, but non-attainment particulate matter 2.5 microns or less in diameter (PM2.5) and Ozone.

4. Source Emissions:
   Potential emissions are limited for the proposed modification of the boiler are 2.7 TPY of PE/PM-10, 37.8 TPY of NOx, 10.5 TPY of CO, and 86.4 TPY of SO2.

5. Conclusion:
   Approval of a permit to install for the proposed emission unit is recommended.

6. Please provide additional notes or comments as necessary:

   None.

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

Pollutant	Tons Per Year
PE	2.7
NOx	37.8
CO	10.5
SOx	86.4

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at:http://epa.ohio.gov/actions.aspx or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email:HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install Administrative Modification
University of Cincinnati
Clifton Campus,,Cincinnati, OH 45221
ID#:P0119432
Date of Action: 10/21/2015
Permit Desc:Administrative modification to limit the emissions and annual input capacity to 10 percent of the current limit to qualify for the "limited use" status under the Boiler MACT (40 CFR Part 63, Subpart DDDDD)..
The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the ID # or: Bonnie Pray, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777

DRAFT

Division of Air Pollution Control
Permit-to-Install
for
University of Cincinnati

Facility ID:	1431070849
Permit Number:	P0119432
Permit Type:	Administrative Modification
Issued:	10/21/2015
Effective:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
University of Cincinnati

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Authorization

Facility ID:	1431070849
Facility Description:	Central Utility and East Campus Utility Plants (CUP & ECUP)
Application Number(s):	A0054008
Permit Number:	P0119432
Permit Description:	Administrative modification to limit the emissions and annual input capacity to 10 percent of the current limit to qualify for the "limited use" status under the Boiler MACT (40 CFR Part 63, Subpart DDDDD).
Permit Type:	Administrative Modification
Permit Fee:	$500.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	10/21/2015
Effective Date:	To be entered upon final issuance

This document constitutes issuance to:

University of Cincinnati
Clifton Campus
Cincinnati, OH 45221

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

Authorization (continued)

Permit Number: P0119432
Permit Description: Administrative modification to limit the emissions and annual input capacity to 10 percent of the current limit to qualify for the "limited use" status under the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

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

Emissions Unit ID:	**B108**
Company Equipment ID:	ECUP Boiler #3
Superseded Permit Number:	P0116277
General Permit Category and Type:	Not Applicable

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 emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, 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 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, andreportingrequirements 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 theSouthwest Ohio Air Quality Agencyin 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 theSouthwest 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 <u>obtained before</u>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 enteredupon 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.

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 emissions unit contained in this permit is subject to 40 CFR Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Area Sources Industrial, Commercial, and Institutional Boilers.

3. 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, B019, B020, B105, B108, B109, P001 thru P008, any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units, or future constructed emissions units, 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.

4. The permittee shall collect and record the following information each month for the emissions units identified in above in B.3.:

   a) the name and identification number of each HAP containing material employed (if applicable);

   b) the identification of each individual HAP contained in each material employed (if applicable);

   c) the HAP emission factor for each individual HAP and each type of operation;

   d) the total individual HAP emissions for each HAP from all sources, in pounds or tons per month [b) times c)];

   e) the total combined HAP emissions from all sources, in pounds or tons per month [the summation of the individual HAP emissions from d) above];

   f) the updated rolling, 12-month summation of the individual HAP emissions for each HAP, in pounds or tons by summing the information in d). This shall include the information for the current month and the preceding eleven calendar months; and

   g) the updated rolling, 12-month summation of the combined HAP emissions, in pounds or tons by summing the information in e). 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 Southwest Ohio Air Quality Agency. This information does not have to be kept on an individual emissions unit basis.

5. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations outlined in B.3. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June, and July through September, respectively).

6. Emission Limitations:

HAP emissions shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling, 12-month summation for the emissions units listed in B.3.

Applicable Compliance Method:

Compliance with the HAP emission limitations in B.3.shall be demonstrated by the record keeping requirements specified in B.4.

7. The following abbreviations are used throughout this permit:

NOx = Nitrogen oxides

CO = Carbon monoxide

VOC = Volatile organic compounds

PE = Particulate matter measurable by the applicable test methods in 40 CFR Part 60, Appendix A, "Standards of Performance for New Stationary Sources"

PM10 = Particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers as measured either by a reference method that is based on 40 CFR Part 50, Appendix J and designated in accordance with 40 CFR Part 53 or by an equivalent method designated in accordance with 40 CFR Part 53

SO2 = Sulfur dioxide

TPY = Tons per year

mmBtu = million British thermal units

PTI = Permit to Install

CFR = Code of Federal Regulations

OAC = Ohio Administrative Code

ORC = Ohio Revised Code

C. Emissions Unit Terms and Conditions

1. B108, ECUP Boiler #3

Operations, Property and/or Equipment Description:

135.6 MMBTU Spreader Stoker Boiler w/ fabric filter, capable of coal, clean cellulosic biomass and/or pelletized fuel (capacity with CCB is 131 MMBtu/hr; capacity with pelletized fuel 90 MMBtu/hr) [This emissions unit was formerly identified as B008 under facility ID 1431070270 and has been incorporated into this facility ID as emissions unit B108 in accordance with Engineering Guide 58.]

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) d)(13) thru d)(14).

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(D) Synthetic minor to avoid Prevention of Significant Deterioration (PSD) and to obtain a Limited Use Boiler designation for 40 CFR 63, Subpart DDDDD Note that the emission limitation in this term was established originally under permit to install (PTI) number 14-0485 issued in 1984, and was carried forward in P0108825 which added the use of clean cellulosic biomass, as well as into this permitting action which is now adding the use of pelletized fuel. The addition of pelletized fuel does not increase the emission limitation as long as the permittee operates this emissions unit in accordance with the synthetic minor terms of this permitting action.	Carbon monoxide (CO) emissions shall not exceed 10.5 tons per year (TPY), based upon a rolling, 12-month summation. See b)(2)a., c)(1) – c)(7).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	ORC 3704.03(T) Best Available Technology (BAT) Note that the emission limitations in this term were established originally under permit to install (PTI) number P0108825 issued in 2011, and are being carried over into this administrative modification because of the addition of the use of pelletized fuel will not exceed these emission limitations.	When firing clean cellulosic biomass (CCB) and/or pelletized fuel only: Particulate matter 10 microns and less in diameter (PM10)* shall not exceed 0.034 grain per dry standard cubic foot (gr/dscf); Particulate matter 2.5 microns and less in diameter (PM2.5)* shall not exceed 0.032 gr/dscf; and CO emissions shall not exceed 0.20 lb/MMBtu; See b)(2)c. * includes condensables
c.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 Note that the emission limitation in this term were established originally under permit to install (PTI) number P0108825 issued in 2011, and are now being carried over into this administrative modification because the addition of the use of pelletized fuel will not exceed this emission limitation.	When firing clean cellulosic biomass (CCB) and/or pelletized fuel: Volatile organic compound (VOC) emissions shall not exceed 0.017 lb/MMBtu of actual heat input. See b)(2)d.
d.	OAC rule 3745-31-05 (A)(3)(a)(ii), as effective 12/01/06 Note that the emission limitation in this term were established originally under permit to install (PTI) number P0108825 issued in 2011, and are now being carried over into this administrative modification because the addition of the use of pelletized fuel will not exceed this emission limitation.	When firing clean cellulosic biomass (CCB) and/or pelletized fuel: See b)(2)e.
e.	OAC rule 3745-31-05(A)(3) Best Available Technology (BAT) Note that the emission limitation in this term was established originally under permit to install (PTI) number	Particulate emissions (PE) shall not exceed 0.05 lb/MMBtu of actual heat input and 2.7 TPY. Nitrogen Oxide (NOx) emissions shall not exceed 0.70 lb. of NOx/MMBtu of actual heat input and 37.8 TPY.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	14-0485 issued in 1984, and was carried forward in P0108825 which added the use of clean cellulosic biomass, as well as into this permitting action which is now adding the use of pelletized fuel. The addition of pelletized fuel does not increase the emission limitation as long as the permittee operates this emissions unit in accordance with the synthetic minor terms of this permitting action. See b)(2)b.	Sulfur Dioxide (SO2) emissions shall not exceed 1.60 lbs/MMBtu of actual heat input* 86.4 TPY. * the SO2 lbs/MMBtu limit established by this rule is less stringent than the limitation established by OAC 3745-18-37(H)(1). Note that OAC rule 3745-18-37(H)(1) was effective after 1984.
f.	OAC rule 3745-17-10(B)(1)	The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-17-07(A)(1)	Visible emissions shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
h.	OAC rule 3745-18-37(H)(1)	Sulfur dioxide (SO_2) emissions shall not exceed 1.45 pounds per MMBtu of actual heat input. See c)(3), c)(4), and c)(5).
i.	OAC rule 3745-103 Acid Rain Permits and Compliance	Exempt. See b)(2)f.
j.	40 CFR Part 60, Subpart Db Standards of Performance for New Stationary Sources (NSPS), Industrial, Commercial, and Institutional Steam Generating Units	Exempt. See b)(2)g.
k.	40 CFR Part 60, Subpart Eb Standards of Performance for New Stationary Sources (NSPS), Large Municipal Waste Combustors	Exempt. See b)(2)h. and c)(2).
l.	40 CFR Part 60, Subpart CCCC Standards of Performance for New Stationary Sources (NSPS), Commercial and Industrial Solid Waste Incineration Units	Exempt. See b)(2)i.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
m.	40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480 – 7575) National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters (In accordance with 63.7490 and 63.7499, this emissions unit is an existing boiler installed before June 4, 2010 designed to burn solid fuel. The emissions units meet the criteria in the definition of limited-use boiler or process heater based on an annual capacity factor of no more than 10 percent**.**	Limited–use boilers and process heaters must complete a tune-up every five years as specified in 40 CFR 63.7540. They are not subject to the emission limits in Tables 1 and 2 or 11 through 13 to this subpart, the annual tune-up or the energy assessment requirements in Table 3 to this subpart, or the operating limits in Table 4 to this subpart. 40 CFR 63.7500(c). See c)(1), c)(6), c)(7) and c)(9).
n.	40 CFR Part 63, Subpart A (40 CFR 63.7505)	Table 10 to 40 CFR Part 63, Subpart DDDDD – Applicability of General Provisions (Subpart A) to Subpart DDDDD shows which parts of the General Provisions in 40 CFR Part 63.1-15 apply.

(2) Additional Terms and Conditions

a. This permit establishes the federally enforceable emission limitation for purposes of limiting the annual potential to emit (PTE) of this emissions unit to avoid Prevention of Significant Deterioration (PSD) permitting requirements. This federally enforceable emission limitation is based on the operational restrictions contained in c)(2), except for coal, c)(4), and c)(5) which limit fuel usage and type in this emissions unit.

This federally enforceable emission limitation established above for the use of clean cellulosic biomass and/or pelletized fuel resulted in an annual restricted PTE of 10.5 tons of CO. This annual restricted PTE emission level was determined by multiplying the federally enforceable pound per million Btu emission limitation by the maximum heat input and the maximum allowable rolling 12-month clean cellulosic biomass and/or pelletized fuel usage and dividing by 2000. The annual restricted PTE emission level has been established via tons per year limitation in b)(1)a.

b. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitations and compliance with all applicable regulations, record keeping, and reporting required by this permit that are associated with the above OAC rule 3745-31-05(A)(3) limitations.

The above-specified emission limitations under OAC rule 3745-31-05(A)(3) represent existing best available technology (BAT) requirements established under the prior permitting actions for this emissions unit.

c. Compliance with ORC 3704.03(T) shall be demonstrated by the emission limitations and compliance with applicable fuel restriction requirements, record keeping, reporting, and emission testing required by this permit that are associated with the above ORC 3704.03(T) limitation and requirements when combusting clean cellulosic biomass material.

The above-specified limitations under ORC 3704.03(T) represent best available technology (BAT) requirements that were triggered as a result of the Chapter 31 modification in this permit action for the use of clean cellulosic biomass which increased potential emissions of CO, PM10, and PM2.5when combusting clean cellulosic biomass materials in this emissions unit.

d. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

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

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC emissions from this air contaminant source since the uncontrolled potential to emit for VOC emissions is less than ten tons per year.

f. This emissions unit is exempt from the acid rain program requirements in OAC Chapter 3745-103 pursuant to the exemption for non-utility units specified in OAC rule 3745-103-02(B)(8).

g. This emissions unit is exempt from the steam generating unit requirements in 40 CFR Part 60, Subpart Db for affected units that commence construction, modification, or reconstruction after 6/19/1984. The Alternative Fuels Project, as proposed in this permitting action, does not result in a modification or reconstruction of this emissions unit pursuant to the definitions of modification and reconstruction specified in 40 CFR Part 60.14 and 60.15. This emissions unit is undergoing a physical and/or operational change as a result of the Alternative Fuels Project; however, the change does not result in an increase in

the emission rate of any pollutant subject to regulation under Subpart Db (i.e., filterable particulate matter, sulfur dioxide, and nitrogen oxides).

h. This emissions unit is exempt from the municipal waste combustor requirements in 40 CFR Part 60, Subpart Eb pursuant to the definitions of municipal solid waste and municipal waste combustor specified in 40 CFR Part 60.51b. The clean cellulosic biomass material (clean wood) and pelletized fuel are materials specifically excluded from the definition of municipal solid waste.

In order to demonstrate that this emissions unit is exempt from being subject to 40 CFR Part 60, Subpart Eb, the permittee shall comply with the monitoring and record keeping requirements as specified in d)(6) and d)(7) to ensure that the clean cellulosic biomass material and pelletized fuel do not contain discarded waste constituents that would classify the fuel as municipal solid waste.

i. This emissions unit is exempt from the Standards of Performance for Commercial and Industrial Solid Waste Incinerations (CISWI) Units, 40 CFR Part 60, Subpart CCCC, by the exclusive use of traditional fuels as identified in 40 CFR 241.2 which specifically identifies clean cellulosic biomass as an alternative fuel developed from virgin materials that can now be used as fuel products. The pelletized fuel has been deemed non-waste fuel by USEPA (see g)(3)) and as such is excluded from applicability to this subpart.

j. The emissions from this emissions unit shall be vented to the baghouse at all times the emissions unit is in operation.

k. The permittee shall maintain a written quality assurance/quality control plan for the continuous opacity monitoring system, designed to ensure continuous valid and representative readings of opacity and compliance with 40 CFR Part 60, Appendix B, Performance Specification 1. The plan shall include, at a minimum, procedures for conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring accurate operation of the continuous opacity monitoring system on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

c) Operational Restrictions

(1) The maximum annual heat input rate for emissions unit B108 shall not exceed 118,785 MMBtu per year, based upon a rolling, 12 month summation of the heat input rates.

(2) The permittee shall burn only coal, clean cellulosic biomass material, or pelletized fuel material in this emissions unit.

(3) The coal received for burning in this emissions unit shall have a sulfur content and heat content that, when calculated in terms of pounds of sulfur dioxide per million Btu of heat

content, complies with the allowable sulfur dioxide emission limitation contained in this permit.

(4) The clean cellulosic biomass material burned in this emissions unit shall have a sulfur content that, when calculated in terms of pounds of sulfur dioxide per million Btu of heat content, complies with the allowable sulfur dioxide emission limitation contained in this permit.

(5) The pelletized fuel material burned in this emissions unit shall have a sulfur content that, when calculated in terms of pounds of sulfur dioxide per million Btu of heat content, complies with the allowable sulfur dioxide emission limitation contained in this permit

(6) The maximum annual clean cellulosic biomass material usage rate for this emissions unit shall not exceed 8,200 tons per rolling, 12-month period.

(7) The maximum annual pelletized fuel material usage rate for this emissions unit shall not exceed 3,500 tons per rolling, 12-month period.

(8) This facility shall operate and maintain an oxygen analyzer to automatically regulate excess air to the boiler.

(9) See 40 CFR Part 63, Subpart DDDDD.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than coal, clean cellulosic biomass material or pelletized fuel material, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) The permittee shall collect representative grab samples of the coal burned in this emissions unit on a weekly basis. Each sample shall be collected from the feed conveyor. The coal sampling shall be performed in accordance with ASTM method D2234, Standard Practice for Collection of a Gross Sample of Coal. At the end of each calendar month, all of the grab samples which were collected during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods to be used to determine the ash content, sulfur content, and heat content shall be the most recent version of: ASTM method D3174, Standard Test Method for Ash in the Analysis Sample of Coal and Coke from Coal; ASTM method D3177, Standard Test Methods for Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Standard Test Methods for Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865 Standard Test Method for Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

(3) The permittee shall collect, or require the clean cellulosic biomass material and pelletized fuel supplier to collect, a representative sample of the clean cellulosic biomass

and pelletized fuel from each shipment of fuel which is received for burning in this emissions unit. The sampling shall be performed in accordance with ASTM method D2234, Standard Practice for Collection of a Gross Sample of Coal. At the end of each month, the representative samples of each alternative fuel from all shipments of clean cellulosic biomass material and pelletized fuel which were received during that month shall be combined into composite samples. This combination may be a physical composite or a weighted average of the test data for the individual shipments.

Each monthly composite sample of clean cellulosic biomass and pelletized fuel shall be analyzed for sulfur content (percent) and heat content (Btu/pound of fuel). The analytical methods to be used to determine the sulfur content and heat content shall be the most recent version of: ASTM method D3177, Standard Test Methods for Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Standard Test Methods for Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace

Combustion Methods; and ASTM method D5865 Standard Test Method for Gross Calorific Value of Coal and Coke, respectively.Alternative, equivalent methods may be used upon written approval from the Hamilton County Department of Environmental Services.

(4) The permittee shall maintain monthly records of the following information:

a. the clean cellulosic biomass material usage for each month, and

b. the pelletized fuel usage for each month, and

c. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the clean cellulosic biomass material and pelletized fuel usage figures.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the clean cellulosic biomass material and pelletized fuel usages for each calendar month.

(5) The permittee shall maintain monthly records of the total quantity of coal received, the results of the analyses for ash content, sulfur content and heat content, and the calculated sulfur dioxide emission rate (in pounds per mmBtu), for all shipments of coal during each calendar month. The sulfur dioxide emission rate is based upon a volume-weighted average as calculated per the equation in OAC rule 3745-18-04(F)(1).

(6) The permittee shall develop, implement, and maintain an Alternative Fuel Procurement and Monitoring Plan (AFPMP) to ensure that only clean cellulosic biomass material and pelletized fuel, as described in c)(2), is being burned in this emissions unit and to prevent unacceptable waste from being burned. The plan shall, at a minimum, specify the following:

a. A description of the clean cellulosic biomass material fuel to be burned, including the raw materials used to produce the fuel;

b. A description of the pelletized material fuel to be burned, including the raw materials used to produce the fuel;

c. A description of prohibited waste constituents that would classify the alternative fuel as municipal solid waste;

d. Inspection and sorting procedures and protocol used to eliminate prohibited fuels and minimize unacceptable fuels;

e. Auditing procedures including records of fuel specification, quality control, and batch identification; and

f. Notification and approval procedures for changes to fuel constituents.

(7) The AFPMP and related records must be kept onsite and available for inspection during regular office hours. The permittee shall submit a copy of the AFPMP to Southwest Ohio Air Quality Agency 30 days prior to commencing operation of the Alternative Fuels Project.

(8) The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of particulate emissions from the common stack serving emissions units B105, and B108. The opacity of the visible particulate emissions from emissions units B105, and B108 shall be monitored in the combined stack for the three boilers and the visible particulate emission limitation specified in b)(1)g. applies to each individual boiler as monitored at the common stack. An exceedance of the visible emission limitation in b)(1)g. as measured at the common stack does not necessarily constitute an exceedance of the emission limitation for all boilers. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

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

a. percent opacity on an instantaneous (one-minute or less) and 6-minute block average basis;

b. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

c. hours of operation of the emissions unit, continuous opacity monitoring system, and control equipment;

d. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous opacity monitoring system;

e. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous opacity monitoring system; as well as, and

f. the reason (if known) and the corrective actions taken (if any) for each such event in d. and e. above.

(9) The permittee shall maintain on-site, the document of certification received from the U.S. EPA or the Ohio EPA's Central Office verifying that the continuous opacity monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter/document of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

(10) Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

(11) The acceptable range for the pressure drop across the baghouse shall be based upon the manufacturer's specifications, until such time as any required performance testing is conducted and an alternative pressure drop range and/or limit is established. The permittee shall record the pressure drop across the baghouse on continuous basis.

(12) The permittee shall properly install, operate, and maintain equipment to continuously monitor the pressure drop, in inches of water, across the baghouse when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown. The permittee shall record the pressure drop across the baghouse on a continuous basis. The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee. The acceptable pressure drop shall be based upon the manufacturer's specifications until such time as any required performance testing is conducted and the appropriate range is established to demonstrate compliance.

Whenever the monitored value for the pressure drop deviates from the limit or range established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

a. the date and time the deviation began;

b. the magnitude of the deviation at that time;

c. the date the investigation was conducted;

d. the name(s) of the personnel who conducted the investigation; and

e. the findings and recommendations.

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

f. a description of the corrective action;

g. the date corrective action was completed;

h. the date and time the deviation ended;

i. the total period of time (in minutes) during which there was a deviation;

j. the pressure drop readings immediately after the corrective action was implemented; and

k. the name(s) of the personnel who performed the work.

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

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

(13) The permit to install for this emissions unit B108 was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's “Review of New Sources of Air Toxic Emissions” policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the “worst case” pollutant(s):

Pollutant: Benzene

TLV (ug/m3): 1600

Maximum Hourly Emission Rate (lbs/hr): 0.36

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.178

MAGLC (ug/m3): 38

Pollutant: Formaldehyde

TLV: 0.3 ppm

Maximum Hourly Emission Rate (lbs/hr): 0.38

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.186

MAGLC (ug/m3): 5.26

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the “Air Toxic Policy” is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the “Air Toxic Policy” will still be satisfied. If, upon evaluation, the permittee determines that the “Air Toxic Policy” will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the “Air Toxic Policy” include the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

(14) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the “Air Toxic Policy:”

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the “Air Toxic Policy”; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the “Air Toxic Policy” for the change.

(15) The permittee also shall maintain the following records:

a. the calendar date for each day that this emissions unit is operated;

b. the number of hours of operation for this emissions unit for each day;

c. the actual monthly heat input rate for this emissions unit, in MMBtu/month;

d. the rolling, 12-month heat input summation in c)(1); and

e. the rolling, 12-month average annual capacity factor for this emissions unit, in percent.

(16) See 40 CFR Part 63, Subpart DDDDD.

e) Reporting Requirements

(1) The permittee shall submit quarterly reports on the quality and quantity of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:

a. the total quantity of coal received (tons);

b. the average sulfur content (percent) of the coal received;

c. the average heat content (Btu/pound) of the coal received;

d. the average sulfur dioxide emission rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received;

e. the rolling, 12-month heat input summation in c)(1); and

f. the rolling, 12-month average annual capacity factor for this emissions unit, in percent.

Compliance with the sulfur dioxide emission limit shall be determined each month by calculating the average monthly sulfur dioxide emission rate, using the results of the analyses of the monthly composite sample for sulfur content and heat content.

These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall cover the data obtained during the previous calendar quarters.

(2) The permittee shall submit quarterly reports on the quality and quantity of clean cellulosic biomass material and pelletized fuel burned in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:

a. the total quantity of clean cellulosic biomass material burned (tons or pounds);

b. the total quantity of pelletized fuel material burned (tons or pounds);

c. a description of any material other than coal and clean cellulosic biomass material and pelletized fuel burned;

d. the average sulfur content (percent) of the clean cellulosic biomass material and pelletized fuel burned;

e. the average heat content (Btu/pound) of the clean cellulosic biomass material and pelletized fuel burned; and

f. the average sulfur dioxide emission rate (pounds sulfur dioxide/mmBtu actual heat input) from the clean cellulosic biomass material and pelletized fuel burned.

Compliance with the sulfur dioxide emission limit shall be determined each month by calculating the average monthly sulfur dioxide emission rate, using the results of the analyses of the monthly composite sample for sulfur content and heat content.

These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall cover the data obtained during the previous calendar quarters.

(3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. all exceedances of the rolling, 12-month emission limitation for CO.

b. all exceedances of the rolling, 12 month of the clean cellulosic biomass material usage rate and for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative clean cellulosic biomass usage amounts in c)(6);

c. all exceedances of the rolling, 12 month of the pelletized fuel material usage rate and for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative pelletized fuel material usage amounts in c)(7);

d. each period of time (start time and date, and end time and date) when the pressure drop across the baghouse was outside of the range specified by the manufacturer and outside of the acceptable range following any required compliance demonstration;

e. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the baghouse;

f. each incident of deviation described in “d.-e.” (above) where a prompt investigation was not conducted;

g. each incident of deviation described in “d.-e.” where prompt corrective action, that would bring the pressure drop into compliance with the acceptable range, was determined to be necessary and was not taken; and

h. each incident of deviation described in "d.-e." where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(4) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous opacity monitoring system:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 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 opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, OAC rule 3745-17-07, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance.

b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

i. the facility name and address;

ii. the manufacturer and model number of the continuous opacity monitor;

iii. a description of any change in the equipment that comprises the continuous opacity monitoring system (COMS), including any change to the hardware, changes to the software that may affect COMS readings, and/or changes in the location of the COMS sample probe;

iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;

v. the total operating time (hours) of the emissions unit;

vi. the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;

vii. the date, time, and duration of any/each malfunction** of the continuous opacity monitoring system, emissions unit, and/or control equipment;

viii. the date, time, and duration of any downtime** of the continuous opacity monitoring system and/or control equipment while the emissions unit was in operation; and

ix. the reason (if known) and the corrective actions taken (if any) for each event in vii. and viii. above.

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

* where no exceedance of the opacity limit has 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 quarterly EER report.

** each downtime and malfunction event shall be reported regardless if there is an exceedance of the opacity limit.

The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

(5) 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.

(6) See 40 CFR Part 63, Subpart DDDDD.

f) Testing Requirements

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

a. Emission Limitation:

CO emissions shall not exceed 10.5 TPY as a rolling, 12-month summation.

Applicable Compliance Method(s):

Compliance with the annual emission rate, when combusting coal or clean cellulosic biomass and/or pelletized fuel materials, is based upon the summation of the monthly actual heat input in MMBtu per year for the emissions unit multiplied by the actual CO emissions rate determined by the most recent stack emissions test.

b. Emission Limitations:

When firing only clean cellulosic biomass and/or pelletized fuel material:

PM10 emissions shall not exceed 0.034 gr/dscf; and

PM2.5 emissions shall not exceed 0.032 gr/dscf.

Applicable Compliance Method:

The emission limitations specified above are based upon compliance with the a particulate emissions (PE) rate of 0.039 pound per mmBtu and the calculated PM10and PM2.5 filterable percentage of the total allowable PE rate, including the condensable portion, based on AP-42 emission factors found in Section 1.6 and

using an F-factor of 9420 dscf/MMBtu, the average of the F-factors for wood and wood bark in reference method 19, table 19-2. Compliance with these emission limitations shall be demonstrated through the PE testing required in f)(2)below, applying the appropriate AP-42 cumulative particulate size distribution and size-specific emission factors found in Section 1.6 for wood combustion. It should be noted that supplied emissions associated with the burning of pelletized fuel material was below the level mentioned for wood combustion.

c. Emission Limitation:

CO emissions shall not exceed 0.20 lb/MMBtu.

Applicable Compliance Method:

The emission limitation specified above is based on company submitted data estimating a maximum CO emission rate of 231 ppm CO at 3% oxygen at the entrance of the economizer when firing 100% clean cellulosic biomass material.It should be noted that supplied emissions associated with the burning of pelletized fuel material was below the level mentioned for burning 100% clean cellulosic biomass material.

Compliance with these emission limitations shall be demonstrated through the CO testing required in f)(2)below.

Compliance when firing coal may be determined by the appropriate emission factor found in US EPA AP-42 Section 1.1 (dated 9/98) or the permittee's most recent emissions test data. If required, the permittee shall demonstrate compliance with the CO emission limitation when combusting coal through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

d. Emission Limitation:

When firing only clean cellulosic biomass material and/or pelletized fuel:

VOC emissions shall not exceed 0.017 pound per mmBtu of actual heat input.

Applicable Compliance Method:

The emission limitations specified above are based upon the appropriate AP-42 emission factor found in Section 1.6.3. If required, the permittee shall demonstrate compliance with the VOC emission limitation by emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25. It should be noted that supplied emissions associated with the burning of pelletized fuel material was below the level mentioned for burning 100% clean cellulosic biomass material.

Compliance with the annual emission rate is based upon the summation of the monthly actual heat input in MMBtu per year for the emissions unit multiplied by the AP-42 VOC emissions factor.

e. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

Ongoing compliance with the opacity limitation 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.

f. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.05 pound per mmBtu of actual heat input and 2.7 TPY.

Applicable Compliance Methods:

Compliance with the mass allowable emission limitation in pound per mmBtu shall be demonstrated through the particulate emission testing required in f)(2) below. Compliance with the annual emission rate, when combusting coal, clean cellulosic biomass and/or pelletized fuel, is based upon the summation of the monthly actual heat input in MMBtu per year for the emissions unit multiplied by the actual PE emissions rate determined by the most recent stack emissions test.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5.

g. Emission Limitation:

SO2 emissions shall not exceed 1.45 pounds per mmBtu of actual heat input and 86.4 TPY.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined by using the fuel analysis records required pursuant to d)(2), d)(3), and d)(6) and the applicable equation in OAC rule 3745-18-04(F) below.

Sulfur dioxide emissions from solid fuel samples shall be calculated as follows:

$ER = (1 \times 10^{6}) / H \times S \times 1.9$

Where,

ER = the emission rate in pounds of sulfur dioxide per mmBtu;

H = the heat content of the solid fuel in Btu per pound; and

S = the decimal fraction of sulfur in the solid fuel.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

Compliance with the annual emission rate, when combusting coal, clean cellulosic biomass or pelletized fuel, is based upon the summation of the monthly actual heat input in MMBtu per year for the emissions unit multiplied by the actual SO2 emissions rate determined by the most recent stack emissions test or an emission rate based on the above fuel sampling analysis method.

h. Emission Limitation:

Nitrogen Oxide (NOx) emissions shall not exceed 0.70 lb. of NOx/MMBtu of actual heat input and 37.8 TPY.

Applicable Compliance Methods:

Compliance with the mass allowable emissions limitation in pound per MMBtu shall be demonstrated through the NOx emission testing required in f)(2) below. Compliance with the annual emission rate, when combusting coal, clean cellulosic biomass and/or pelletized fuel, is based upon the summation of the monthly actual heat input in MMBtu per year for the emissions unit multiplied by the actual NOx emissions rate determined by the most recent stack emissions test.

(2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. the emission testing shall be conducted within 6 months after commencing operation of this emissions unit firing clean cellulosic biomass material and/or pelletized fuel identified in this permit to install; unless otherwise approved by Southwest Ohio Air Quality Agency to coincide with the required periodic testing pursuant to the terms and conditions for this emissions unit contained in the permittee's Title V Operating Permit;

b. the emission testing shall be conducted to demonstrate compliance with the allowable mass emission rates for particulates (PE), nitrogen oxides (NOx) and carbon monoxide (CO) when firing clean cellulosic biomass and/or pelletized fuel material;

c. the following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. 40 CFR Part 60, Appendix A, Methods 1 through 4; and

ii. 40 CFR Part 60, Appendix A, Method 5 and the procedures specified in OAC rule 3745-17-03(B)(9) for PE;

iii. 40 CFR Part 60, Appendix A, Method 7 for NOx;

iv. 40 CFR Part 60, Appendix A, Method 10 for CO.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, firing clean cellulosic biomass material and/or pelletized fuel, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency;

e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Southwest Ohio Air Quality Agency refusal to accept the results of the emission test(s).

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

g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Southwest Ohio Air Quality Agency within 30 days following completion of the test(s). The permittee may request additional time for submittal of the written report. The request may be granted, where warranted, if submitted prior to testing and with prior approval from the Hamilton County Department of Environmental Services.

g) Miscellaneous Requirements

(1) The terms and conditions in this permit to install shall supersede the terms and conditions for emissions unit B108 contained in PTI number 14-485, issued on April 18, 1984, permit P0108825, issued December 22, 2011 and permit P0116277, issued June 30, 2014.

(2) The table below demonstrates that this permit action does not trigger New Source Review (NSR) based on the NSR reform rule of 2002. It should be noted that supplied emissions associated with the burning of pelletized fuel material was below the level listed in the below Table.

Source/Scenario	PM (TSP)	Condensable PM	PM10 (filterable + condensable)	PM2.5 (filterable + condensable)	SO_2	NO_X	CO	VOC	lead
BAE 3 Boiler (B108)	4.3	12.5	15.1	13.6	362.3	122.0	6.3	0.6	0.0049
Projected actual (B108)	15.0	6.5	17.6	16.2	8.9	130.4	76.7	6.5	0.0184
Emission Change (B108)	**10.7**	**-6.0**	**2.5**	**2.6**	**-353.4**	**8.5**	**70.5**	**5.9**	**0.014**
BAE Wood chip receiving and transfer (new)	0	-	0	0	-	-	-	-	-
BAE Coal receiving and transfer (F001)	0.32	-	0.31	0.31	-	-	-	-	-
Projected actual (new wood receiving and handling)	0.06	-	0.02	0.004	-	-	-	-	-
Emission Change (F001)	**-0.26**	**0**	**-0.29**	**-0.31**	**0**	**0**	**0**	**0**	**0**
TOTAL EMISSIONS CHANGE	**10.4**	**-6.0**	**2.2**	**2.3**	**-353.4**	**8.5**	**70.5**	**5.9**	**0.014**
Ohio modeling significant emission rates	*-*	*-*	*10*	*10*	*25*	*25*	*100*		*0.6*
PSD significant emission rates	*-*	*-*	*15*	*10*	*40*	*40*	*100*	*40*	*0.6*

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(3) Pelletized fuel, where used in this permit, is defined as a non-waste material conforming to the description as submitted in application number A0049581 as submitted March 25, 2014.