



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
WARREN COUNTY**

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:

Lazarus Gov.  
Center

**Application No: 14-02713**

**DATE: 5/1/2003**

Proctor and Gamble Company  
Christine Newman  
8700 Mason Montgomery Road  
Mason, OH 45040-9462

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

Very truly yours,

Michael W. Ahern, Supervisor  
Field Operations and Permit Section  
Division of Air Pollution Control

CC: USEPA

HCDES



**Permit To Install  
Terms and Conditions**

**Issue Date: 5/1/2003  
Effective Date: 5/1/2003**

**FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 14-02713**

Application Number: 14-02713  
APS Premise Number: 1483090334  
Permit Fee: \$0  
Name of Facility: Proctor and Gamble Company  
Person to Contact: Christine Newman  
Address: 8700 Mason Montgomery Road  
Mason, OH 45040-9462

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**8700 Mason Montgomery Road  
Mason Ohio, Ohio**

Description of proposed emissions unit(s):  
**2 - 100 and 1 - 50 MMBtu number 2 fuel oil/gas fired boilers, 3 diesel fired backup generators and one diesel fired fire pump modification.**

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## Part I - GENERAL TERMS AND CONDITIONS

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

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable 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 appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous

calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

## **2. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports 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).

## **3. Risk Management Plans**

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

## **4. Title IV Provisions**

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

## **5. Severability Clause**

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

declared invalid.

## 6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

## 7. Fees

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

## 8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are

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

## 9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## 10. Permit To Operate Application

- a. If 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 the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

## 11. Best Available Technology

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

## 12. 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.

## **B. State Only Enforceable Permit To Install General Terms and Conditions**

### **1. Compliance Requirements**

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

### **2. Reporting Requirements**

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 appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from 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 appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **3. Permit Transfers**

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

### **4. Termination of Permit To Install**

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete

within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

#### **5. Construction of New Sources(s)**

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

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

#### **6. 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.

#### **7. Applicability**

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

**8. Construction Compliance Certification**

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

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

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

**C. Permit To Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE/PM10	13.73
SO2	25.88
NOx	211.65
CO	231.6
VOC	17.76

Proctor and Gamble Company  
PTI Application: **14-02713**  
**Modification Issued: 5/1/2003**

Facility ID: **1483090334**

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

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

None

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

None

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

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
B001 - 100 mmBtu/hour number 2 oil/gas fired boiler modification	OAC rule 3745-31-05(A)(3)	OAC rule 3745-23-06(B) 40 CFR Part 60 Subpart Dc
	OAC rule 3745-31-05(D)	
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-10(B)(1)	
	OAC rule 3745-18-06(D)	

Applicable Emissions  
Limitations/Control  
Measures

The sulfur dioxide emissions from this emissions unit shall not exceed 0.50 lb per million Btu of actual heat input.

0.15 lb NO<sub>x</sub>/mmBtu of actual heat input  
0.20 lb CO/mmBtu of actual heat input  
0.015 lb VOC/mmBtu of actual heat input

The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D), 3745-17-10(B)(1), 3745-21-08(B), 3745-23-06(B) and 40 CFR Part 60 Subpart Dc.

See A.II

The visible emission limitations specified in OAC 3745-17-07(A) are less stringent than the visible emission limitations specified in 40 CFR Part 60 Subpart Dc.

The particulate emissions from this emissions unit shall not exceed 0.020 lb per million Btu of actual heat

input.

The sulfur dioxide emission limitation specified in OAC 3745-18-06(D) is less stringent than the sulfur dioxide emission limitation established in accordance with OAC rule 3745-31-05(A)(3).

See A.I.2.b

Excluding periods of startup or malfunction, visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except for one six-minute period per hour of not more than 27% opacity.

**Modification Issued: 5/1/2003****2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas and limited fuel oil usage.
- 2.b** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the synthetic minor limitations established pursuant to OAC rule 3745-31-05(D) and 3745-31-05(A)(3) in Permit to Install 14-2713.
- 2.c** The total combined emissions from emissions units B001-B003 shall not exceed the following based on a rolling, 12-month summation:

8.55 TPY PE\*  
16.43 TPY VOC  
219.0 TPY CO  
164.25 TPY NO<sub>x</sub>  
18.38 TPY SO<sub>2</sub>

\*For purposes of Prevention of Significant Deterioration applicability, all PM<sub>10</sub> emissions are assume to be PE.

**II. Operational Restrictions**

1. The total amount of distillate fuel oil burned in emissions units B001-B003, combined, shall not exceed 500,000 gallons per year based upon a rolling, 12-month summation.
2. When burning fuel oil in this emissions unit, the permittee shall only use distillate oil (fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78, "Standard Specification for Fuel Oils") in this emissions unit. The sulfur content of the distillate oil shall not exceed 0.5 percent sulfur by weight.
3. The permittee shall burn only natural gas and/or distillate fuel oil in this emissions unit.
4. The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in Section A.I. above.

**III. Monitoring and/or Recordkeeping Requirements**

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain

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records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

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

The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

b. Alternative 2:

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

2. The permittee shall collect and record the following information on a monthly basis:

**Modification Issued: 5/1/2003**

- a. The total amount of natural gas and fuel oil burned in emissions units B001- B003, combined.
  - b. The rolling 12-month summation of the fuel oil usage totals recorded pursuant to A.III.2.a (i.e., the current month's total added to the previous 11-month total).
3. For each day during which the permittee burns a fuel other than natural gas and/or a distillate oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

**IV. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record that shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from Section A.III above. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or distillate oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month fuel oil usage limitation of 500,000 gallons.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the General Term and Condition of this permit.

**V. Testing Requirements**

1. Compliance with the emission limitations specified in this permit shall be determined in accordance with the following methods:

Emission Limitations-

0.020 lb of PE/mmBtu of actual heat input

8.55 TPY of PE, combined B001, B002 and B003

Applicable compliance method when burning only natural gas-

For the use of natural gas, compliance may be determined by multiplying the maximum gas usage rate 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 1.9 lbs filterable PE/MM cu. ft, and then dividing by the

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maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

Applicable compliance method when burning fuel oil-

For the use of fuel oil, compliance may be determined by multiplying the maximum fuel oil usage rate of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/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 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/mmBtu limitation specified in A.I.2 and the fuel oil usage restriction specified in A.II.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 A.III.2.)

2. Emission Limitations -  
0.50 lb of SO<sub>2</sub>/mmBtu

The sulfur content of the distillate oil shall not exceed 0.5 percent sulfur by weight.  
18.38 TPY of SO<sub>2</sub> combined for emissions units B001, B002 and B003.

Applicable compliance method when burning fuel oil-

Compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content as described in Section A.III above meets the limitation.

Applicable compliance method when burning only natural gas-

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning usage rate 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 lb SO<sub>2</sub>/MM cu. ft and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/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 6.

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/mmBtu limitation specified in A.I.2 and the fuel oil usage restriction specified in A.II.1. (Should the actual annual emission rate need to be calculated, the annual

Emissions Unit ID: B001

emission rate shall be calculated by using the emission factors and methodologies specified above and the fuel usage information collected and recorded in A.III.2.)

3. Emission Limitations-

0.15 lb of NO<sub>x</sub>/mmBtu of actual heat input

164.25 TPY of NO<sub>x</sub>, combined for emissions units B001, B002 and B003.

Applicable compliance method when burning natural gas-

The emission factor of 0.15 lb of NO<sub>x</sub>/mmBtu of actual heat input/hr is based upon a performance guarantee by the burner manufacturer, COEN Company, Inc. dated July 13, 1992.

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.

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/mmBtu limitation specified in A.I.2 and the fuel oil usage restriction specified in A.II.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 A.III.2.)

4. Emission Limitations-

0.20 lb of CO/mmBtu of actual heat input

219.0 TPY of CO, combined B001, B002 and B003

Applicable compliance method when burning natural gas or fuel oil-

The emission factor of 0.20 lb of CO/mmBtu of actual heat input/hr is based upon a performance guarantee by the burner manufacturer, COEN Company, Inc. dated July 13, 1992.

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 A.I.2 and the fuel oil usage restriction specified in A.II.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 A.III.2.)

5. Emission Limitations-

0.015 lb of VOC/mmBtu of actual heat input

16.43 TPY of VOC, combined B001, B002 and B003

Applicable compliance method when burning natural gas or fuel oil-

The emission factor of 0.015 lb of VOC/mmBtu of actual heat input/hr is based upon a

Emissions Unit ID: B001

performance guarantee by the burner manufacturer, COEN Company, Inc. dated July 13, 1992.

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 25.

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/mmBtu limitation specified in A.I.2 and the fuel oil usage restriction specified in A.II.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 A.III.2.)

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6. Emission Limitation-  
Visible particulate emissions shall not exceed 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

7. Compliance with the total combined fuel oil usage limitation in A.II.1 shall be determined by the record keeping in A.III.2.

**VI. Miscellaneous Requirements**

1. The terms and conditions of this permit to install shall supersede the terms and conditions of permit to install number 14-02713 issued December 23, 1992 and modified on May 1, 1996.

**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B001 - 100 mmBtu/hour number 2 oil/gas fired boiler modification		None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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Emissions Unit ID: B001

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

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-18-06(D)
B002 - 100 mmBtu/hour number 2 oil/gas fired boiler modification	OAC rule 3745-31-05(A)(3)	OAC rule 3745-23-06(B)
	OAC rule 3745-31-05(D)	40 CFR Part 60 Subpart Dc
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-10(B)(1)	

Applicable Emissions  
Limitations/Control  
Measures

The sulfur dioxide emissions from this emissions unit shall not exceed 0.50 lb per million Btu of actual heat input.

- 0.15 lb NO<sub>x</sub>/mmBtu of actual heat input
- 0.20 lb CO/mmBtu of actual heat input
- 0.015 lb VOC/mmBtu of actual heat input

The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D), 3745-17-10(B)(1), 3745-21-08(B), 3745-23-06(B) and 40 CFR Part 60 Subpart Dc.

See A.II

The visible emission limitations specified in OAC 3745-17-07(A) are less stringent than the visible emission limitations specified in 40 CFR Part 60 Subpart Dc.

The particulate emissions from this emissions unit shall not exceed 0.020 lb per million Btu of actual heat

input.

The sulfur dioxide emission limitation specified in OAC 3745-18-06(D) is less stringent than the sulfur dioxide emission limitation established in accordance with OAC rule 3745-31-05(A)(3).

See A.I.2.b

Excluding periods of startup or malfunction, visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except for one six-minute period per hour of not more than 27% opacity.

**2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas and limited fuel oil usage.
- 2.b** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the synthetic minor limitations established pursuant to OAC rule 3745-31-05(D) and 3745-31-05(A)(3) in Permit to Install 14-2713.
- 2.c** The total combined emissions from emissions units B001-B003 shall not exceed the following based on a rolling, 12-month summation:

8.55 TPY PE\*  
 16.43 TPY VOC  
 219.0 TPY CO  
 164.25 TPY NO<sub>x</sub>  
 18.14 TPY SO<sub>2</sub>

\*For purposes of Prevention of Significant Deterioration applicability, all PM<sub>10</sub> emissions are assume to be PE.

**II. Operational Restrictions**

1. The total amount of distillate fuel oil burned in emissions units B001-B003, combined, shall not exceed 500,000 gallons per year based upon a rolling, 12-month summation.
2. When burning fuel oil in this emissions unit, the permittee shall only use distillate oil (fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78, "Standard Specification for Fuel Oils") in this emissions unit. The sulfur content of the distillate oil shall not exceed 0.5 percent sulfur by weight.
3. The permittee shall burn only natural gas and/or distillate fuel oil in this emissions unit.
4. The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in Section A.I. above.

**III. Monitoring and/or Recordkeeping Requirements**

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented

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by a single batch analysis from the supplier.

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

The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

b. Alternative 2:

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

2. The permittee shall collect and record the following information on a monthly basis:

- a. The total amount of natural gas and fuel oil burned in emissions units B001- B003, combined.
- b. The rolling 12-month summation of the fuel oil usage totals recorded pursuant to A.III.2.a

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(i.e., the current month's total added to the previous 11-month total).

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

#### IV. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record that shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from Section A.III above. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or distillate oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month fuel oil usage limitation of 500,000 gallons.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the General Term and Condition of this permit.

#### V. Testing Requirements

1. Compliance with the emission limitations specified in this permit shall be determined in accordance with the following methods:

Emission Limitations-

0.020 lb of PE/mmBtu of actual heat input

8.55 TPY of PE, combined B001, B002 and B003

Applicable compliance method when burning only natural gas-

For the use of natural gas, compliance may be determined by multiplying the maximum gas usage rate 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 1.9 lbs filterable PE/MM cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

Applicable compliance method when burning fuel oil-

For the use of fuel oil, compliance may be determined by multiplying the maximum fuel oil usage rate of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/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

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through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/mmBtu limitation specified in A.I.2 and the fuel oil usage restriction specified in A.II.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 A.III.2.)

2. Emission Limitations -  
0.50 lb of SO<sub>2</sub>/mmBtu

The sulfur content of the distillate oil shall not exceed 0.5 percent sulfur by weight.  
18.38 TPY of SO<sub>2</sub> combined for emissions units B001, B002 and B003.

Applicable compliance method when burning fuel oil-

Compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content as described in Section A.III above meets the limitation.

Applicable compliance method when burning only natural gas-

For the use of natural gas, compliance may be determined by multiplying the hourly gas burning usage rate 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 lb SO<sub>2</sub>/MM cu. ft and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/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 6.

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/mmBtu limitation specified in A.I.2 and the fuel oil usage restriction specified in A.II.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 A.III.2.)

3. Emission Limitations-

0.15 lb of NO<sub>x</sub>/mmBtu of actual heat input

164.25 TPY of NO<sub>x</sub>, combined for emissions units B001, B002 and B003.

Applicable compliance method when burning natural gas-

The emission factor of 0.15 lb of NO<sub>x</sub>/mmBtu of actual heat input/hr is based upon a performance guarantee by the burner manufacturer, COEN Company, Inc. dated July 13, 1992.

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.

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/mmBtu limitation specified in A.I.2 and the fuel oil usage restriction specified in A.II.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 A.III.2.)

4. Emission Limitations-  
0.20 lb of CO/mmBtu of actual heat input  
219.0 TPY of CO, combined B001, B002 and B003

Applicable compliance method when burning natural gas or fuel oil-

The emission factor of 0.20 lb of CO/mmBtu of actual heat input/hr is based upon a performance guarantee by the burner manufacturer, COEN Company, Inc. dated July 13, 1992.

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 A.I.2 and the fuel oil usage restriction specified in A.II.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 A.III.2.)

5. Emission Limitations-  
0.015 lb of VOC/mmBtu of actual heat input  
16.43 TPY of VOC, combined B001, B002 and B003

Applicable compliance method when burning natural gas or fuel oil-

The emission factor of 0.015 lb of VOC/mmBtu of actual heat input/hr is based upon a performance guarantee by the burner manufacturer, COEN Company, Inc. dated July 13, 1992.

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 25.

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/mmBtu limitation specified in A.I.2 and the fuel oil usage restriction specified in A.II.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 A.III.2.)

6. Emission Limitation-  
Visible particulate emissions shall not exceed 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity.

**Applicable Compliance Method-**

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

7. Compliance with the total combined fuel oil usage limitation in A.II.1 shall be determined by the record keeping in A.III.2.

**VI. Miscellaneous Requirements**

1. The terms and conditions of this permit to install shall supersede the terms and conditions of permit to install number 14-02713 issued December 23, 1992 and modified on May 1, 1996.

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B002 - 100 mmBtu/hour number 2 oil/gas fired boiler modification		None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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Emissions Unit ID: B002

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

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-18-06(D)
B003 - 50 mmBtu/hour number 2 oil/gas fired boiler administrative modification	OAC rule 3745-31-05(A)(3)	OAC rule 3745-23-06(B)
	OAC rule 3745-31-05(D)	40 CFR Part 60 Subpart Dc
	OAC rule 3745-17-07(A)	
	OAC rule 3745-17-10(B)(1)	

Applicable Emissions  
Limitations/Control  
Measures

The sulfur dioxide emissions from this emissions unit shall not exceed 0.50 lb per million Btu of actual heat input.

0.15 lb NO<sub>x</sub>/mmBtu of actual heat input  
0.20 lb CO/mmBtu of actual heat input  
0.015 lb VOC/mmBtu of actual heat input

The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D), 3745-17-10(B)(1), 3745-21-08(B), 3745-23-06(B) and 40 CFR Part 60 Subpart Dc.

See A.II

The visible emission limitations specified in OAC 3745-17-07(A) are less stringent than the visible emission limitations specified in 40 CFR Part 60 Subpart Dc.

The particulate emissions from this emissions unit shall not exceed 0.020 lb per million Btu of actual heat

input.

The sulfur dioxide emission limitation specified in OAC 3745-18-06(D) is less stringent than the sulfur dioxide emission limitation established in accordance with OAC rule 3745-31-05(A)(3).

See A.I.2.b

Excluding periods of startup or malfunction, visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except for one six-minute period per hour of not more than 27% opacity.

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## **2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas and limited fuel oil usage.
- 2.b** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the synthetic minor limitations established pursuant to OAC rule 3745-31-05(D) and 3745-31-05(A)(3) in Permit to Install 14-2713.
- 2.c** The total combined emissions from emissions units B001-B003 shall not exceed the following based on a rolling, 12-month summation:

8.55 TPY PE\*  
16.43 TPY VOC  
219.0 TPY CO  
164.25 TPY NO<sub>x</sub>  
18.38 TPY SO<sub>2</sub>

\*For purposes of Prevention of Significant Deterioration applicability, all PM<sub>10</sub> emissions are assume to be PE.

## **II. Operational Restrictions**

1. The total amount of distillate fuel oil burned in emissions units B001-B003, combined, shall not exceed 500,000 gallons per year based upon a rolling, 12-month summation.
2. When burning fuel oil in this emissions unit, the permittee shall only use distillate oil (fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78, "Standard Specification for Fuel Oils") in this emissions unit. The sulfur content of the distillate oil shall not exceed 0.5 percent sulfur by weight.
3. The permittee shall burn only natural gas and/or distillate fuel oil in this emissions unit.
4. The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in Section A.I. above.

## **III. Monitoring and/or Recordkeeping Requirements**

Emissions Unit ID: B003

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

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

The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

b. Alternative 2:

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

2. The permittee shall collect and record the following information on a monthly basis:

- a. The total amount of natural gas and fuel oil burned in emissions units B001- B003, combined.

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Emissions Unit ID: B003

- b. The rolling 12-month summation of the fuel oil usage totals recorded pursuant to A.III.2.a (i.e., the current month's total added to the previous 11-month total).
3. For each day during which the permittee burns a fuel other than natural gas and/or a distillate oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

**IV. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record that shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from Section A.III above. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or distillate oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month fuel oil usage limitation of 500,000 gallons.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the General Term and Condition of this permit.

**V. Testing Requirements**

1. Compliance with the emission limitations specified in this permit shall be determined in accordance with the following methods:

## Emission Limitations-

0.020 lb of PE/mmBtu of actual heat input

8.55 TPY of PE, combined B001, B002 and B003

## Applicable compliance method when burning only natural gas-

For the use of natural gas, compliance may be determined by multiplying the maximum gas usage rate 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 1.9 lbs filterable PE/MM cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

## Applicable compliance method when burning fuel oil-

For the use of fuel oil, compliance may be determined by multiplying the maximum fuel oil usage rate of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation

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through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/mmBtu limitation specified in A.I.2 and the fuel oil usage restriction specified in A.II.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 A.III.2.)

2. Emission Limitations -  
0.50 lb of SO<sub>2</sub>/mmBtu  
The sulfur content of the distillate oil shall not exceed 0.5 percent sulfur by weight.  
18.38 TPY of SO<sub>2</sub> combined for emissions units B001, B002 and B003.

Applicable compliance method when burning fuel oil-  
Compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content as described in Section A.III above meets the limitation.

Applicable compliance method when burning only natural gas-  
For the use of natural gas, compliance may be determined by multiplying the hourly gas usage rate 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 lb SO<sub>2</sub>/MM cu. ft and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/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 6.

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/mmBtu limitation specified in A.I.2 and the fuel oil usage restriction specified in A.II.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 A.III.2.)

3. Emission Limitations-  
0.15 lb of NO<sub>x</sub>/mmBtu of actual heat input  
164.25 TPY of NO<sub>x</sub>, combined for emissions units B001, B002 and B003.

Applicable compliance method when burning natural gas-  
The emission factor of 0.15 lb of NO<sub>x</sub>/mmBtu of actual heat input/hr is based upon a performance

guarantee by the burner manufacturer, COEN Company, Inc. dated July 13, 1992.

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.

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/mmBtu limitation specified in A.I.2 and the fuel oil usage restriction specified in A.II.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 A.III.2.)

4. Emission Limitations-  
0.20 lb of CO/mmBtu of actual heat input  
219.0 TPY of CO, combined B001, B002 and B003

Applicable compliance method when burning natural gas or fuel oil-

The emission factor of 0.20 lb of CO/mmBtu of actual heat input/hr is based upon a performance guarantee by the burner manufacturer, COEN Company, Inc. dated July 13, 1992.

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 A.I.2 and the fuel oil usage restriction specified in A.II.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 A.III.2.)

5. Emission Limitations-  
0.015 lb of VOC/mmBtu of actual heat input  
16.43 TPY of VOC, combined B001, B002 and B003

Applicable compliance method when burning natural gas or fuel oil-

The emission factor of 0.015 lb of VOC/mmBtu of actual heat input/hr is based upon a performance guarantee by the burner manufacturer, COEN Company, Inc. dated July 13, 1992.

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 25.

Compliance with the annual emission limitation shall be assumed as long as compliance is maintained with the lb/mmBtu limitation specified in A.I.2 and the fuel oil usage restriction specified in A.II.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 A.III.2.)

6. Emission Limitation-  
Visible particulate emissions shall not exceed 20% opacity (6-minute average), except for one 6-minute period per hour of not more than 27% opacity.

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Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

7. Compliance with the total combined fuel oil usage limitation in A.II.1 shall be determined by the record keeping in A.III.2.

**VI. Miscellaneous Requirements**

1. The terms and conditions of this permit to install shall supersede the terms and conditions of permit to install number 14-02713 issued December 23, 1992 and modified on May 1, 1996.

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B003 - 50 mmBtu/hour number 2 oil/gas fired boiler modification		None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P001 - Diesel generator 1	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)(5)
		OAC rule 3745-18-06(G)
		OAC rule 3745-23-06(B)
	OAC rule 3745-31-05(D)	
	OAC rule 3745-17-07(A)	

Applicable Emissions  
Limitations/Control  
Measures

This nitrogen oxide emissions from this emissions unit shall not exceed 45.1 lbs per hour.\*

7.12 lbs SO<sub>2</sub>/hr\*

11.98 lbs CO/hr\*

1.27 lbs VOC/hr\*

\*This emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limit.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B)(5).

See A.II

Visible emissions shall not exceed twenty percent opacity, as a six-minute average, except as specified by rule.

The PE(PM) from this emissions unit shall not exceed 0.35 lb per million

Btu of actual heat input.

The sulfur dioxide emission limitation specified in OAC 3745-18-06(G) is equivalent to the sulfur dioxide emission limitation established in accordance with OAC rule 3745-31-05(A)(3).

See A.I.2.c

**Modification Issued: 5/1/2003****2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by limited operating hours.

**2.b** The total combined emissions from emissions units P001-P003 shall not exceed the following based on a rolling, 12-month summation:

5.18 TPY PE/PM10 \*  
1.33 TPY VOC  
12.6 TPY CO  
47.4 TPY NO<sub>x</sub>  
7.5 TPY SO<sub>2</sub>

\*For purposes of Prevention of Significant Deterioration applicability, all PM10 emissions are assumed to be PE.

**2.c** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the synthetic minor limitations established pursuant to OAC rule 3745-31-05(D) and 3745-31-05(A)(3) in Permit to Install 14-2713.

**II. Operational Restrictions**

1. The total hours of operation for emissions units P001-P003, combined, shall not exceed 2,100 hours per year based upon a rolling, 12-month summation.
2. The quality of diesel fuel burned in this emissions unit shall have a combination of heat and sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.50 lb SO<sub>2</sub>/mmBtu of actual heat input.

Compliance with the above-mentioned specification shall be determined by using analytical results provided by the permittee or oil supplier for each shipment of diesel fuel.

3. The permittee shall burn only diesel fuel in this emissions unit.

### III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information on a monthly basis:
  - a. The total hours of operation for emissions units P001-P003, combined.
  - b. The rolling 12-month summation\* of the hours of operation recorded pursuant to A.III.1.a (i.e., the current month's total added to the previous 11-month total).
2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

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

The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be

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collected on days when this emissions unit is only operated for the purpose of "test-firing". The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).)

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

**IV. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record that shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from Section A.III above. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than diesel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedences of the rolling, twelve-month operating hours limitation listed in A.II.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the General Term and Condition of this permit.

**V. Testing Requirements**

1. Compliance with the emission limitations specified in this permit shall be determined in accordance with the following methods:

Emission Limitation-  
7.12 lbs SO<sub>2</sub>/hour

**Applicable Compliance Method**

Compliance with the lbs SO<sub>2</sub>/hr emission limitation may be demonstrated by multiplying the emission factor of 1.01(S) lbs SO<sub>2</sub>/mmBtu, where S is the sulfur content of the diesel fuel oil (AP-42, Fifth Edition, Section 3.4 Large Stationary Diesel Engines, Table 3.4-1, updated 10/96) by the

maximum heat input of 14.1 mmBtu/hr.

The sulfur content of the diesel fuel oil shall be determined by the record keeping in A.III.2.

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

2. Emission Limitation-  
45.1 lbs NO<sub>x</sub>/hour

Applicable Compliance Method-

Compliance with the lbs NO<sub>x</sub>/hr emission limitation may be demonstrated by multiplying the emission factor of 3.2 lbs NO<sub>x</sub>/mmBtu (AP-42, Fifth Edition, Section 3.4 Large Stationary Diesel Engines, Table 3.4-1, updated 10/96) by the maximum heat input of 14.1 mmBtu/hr.

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

3. Emission Limitation-  
11.98 lbs CO/hour

Applicable Compliance Method-

Compliance with the lbs CO/hr emission limitation may be demonstrated by multiplying the emission factor of 0.85 lb CO/mmBtu (AP-42, Fifth Edition, Section 3.4 Large Stationary Diesel Engines, Table 3.4-1, updated 10/96) by the maximum heat input of 14.1 mmBtu/hr.

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

4. Emission Limitation-  
1.27 lbs VOC/hour

Applicable Compliance Method-

Compliance with the lbs VOC/hr emission limitation may be demonstrated by multiplying the emission factor of 0.09 lb VOC/mmBtu (AP-42, Fifth Edition, Section 3.4 Large Stationary Diesel Engines, Table 3.4-1, updated 10/96) by the maximum heat input of 14.1 mmBtu/hr.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

5. Emission Limitation-

Visible emissions shall not exceed twenty percent opacity, as a six-minute average, except as

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specified by rule.

**Applicable Compliance Method-**

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

6. Emission Limitation -  
Particulate emissions shall not exceed 0.35 lb/mmBtu actual heat input.

**Applicable Compliance Method -**

Compliance may be based upon an emission factor of 0.062 lb/mmBtu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.4, Table 3.4-2 (10/96).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

7. Emission Limitation -  
Sulfur dioxide emissions shall not exceed 0.50 lb/mmBtu actual heat input.

**Applicable Compliance Method -**

Compliance with the allowable sulfur dioxide emission limitation may be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

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

8. Compliance with the hours of operation limitation specified in A.II.1. shall be demonstrated by the hours of operation information collected and recorded in A.III.1.

**VI. Miscellaneous Requirements**

1. The terms and conditions of this permit to install shall supersede the terms and conditions of permit to install number 14-02713 issued December 23, 1992 and modified on May 1, 1996.

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - Diesel generator 1	OAC rule 3745-17-11(B)(5)(b)	The particulate emissions (PE) from this emissions unit shall not exceed 0.062 lb per million Btu of actual heat input.

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

1. Emission Limitation -  
 Particulate emissions shall not exceed 0.062 lb/mmBtu actual heat input.

Applicable Compliance Method -

Compliance may be based upon an emission factor of 0.062 lb/mmBtu specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.4, Table 3.4-2 (10/96).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

**VI. Miscellaneous Requirements**

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Emissions Unit ID: P001

None

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

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P002 - Diesel generator 2	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)(5)
		OAC rule 3745-18-06(G)
		OAC rule 3745-23-06(B)
	OAC rule 3745-31-05(D)	
	OAC rule 3745-17-07(A)	

Applicable Emissions  
Limitations/Control  
Measures

This nitrogen oxide emissions from this emissions unit shall not exceed 45.1 lbs per hour.\*

7.12 lbs SO<sub>2</sub>/hr\*

11.98 lbs CO/hr\*

1.27 lbs VOC/hr\*

\*This emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limit.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B)(5).

See A.II

Visible emissions shall not exceed twenty percent opacity, as a six-minute average, except as specified by rule.

The PE(PM) from this emissions unit shall not exceed 0.35 lb per million

Btu of actual heat input.

The sulfur dioxide emission limitation specified in OAC 3745-18-06(G) is equivalent to the sulfur dioxide emission limitation established in accordance with OAC rule 3745-31-05(A)(3).

See A.I.2.c

**Modification Issued: 5/1/2003****2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by limited operating hours.

**2.b** The total combined emissions from emissions units P001-P003 shall not exceed the following based on a rolling, 12-month summation:

5.18 TPY PE/PM10 \*  
1.33 TPY VOC  
12.6 TPY CO  
47.4 TPY NO<sub>x</sub>  
7.5 TPY SO<sub>2</sub>

\*For purposes of Prevention of Significant Deterioration applicability, all PM10 emissions are assumed to be PE.

**2.c** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the synthetic minor limitations established pursuant to OAC rule 3745-31-05(D) and 3745-31-05(A)(3) in Permit to Install 14-2713.

**II. Operational Restrictions**

1. The total hours of operation for emissions units P001-P003, combined, shall not exceed 2,100 hours per year based upon a rolling, 12-month summation.
2. The quality of diesel fuel burned in this emissions unit shall have a combination of heat and sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.50 lb SO<sub>2</sub>/mmBtu of actual heat input.

Compliance with the above-mentioned specification shall be determined by using analytical results provided by the permittee or oil supplier for each shipment of diesel fuel.

3. The permittee shall burn only diesel fuel in this emissions unit.

**III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information on a monthly basis:
  - a. The total hours of operation for emissions units P001-P003, combined.
  - b. The rolling 12-month summation\* of the hours of operation recorded pursuant to A.III.1.a (i.e., the current month's total added to the previous 11-month total).

\*The rolling, twelve-month summation shall be calculated by adding the hours of operation for the current month to the total hours of operation during the previous eleven-months.

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

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

The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

- a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

- b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the

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

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

**IV. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record that shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from Section A.III above. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than diesel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedences of the rolling, twelve-month operating hours limitation listed in A.II.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements of the General Term and Condition of this permit.

**V. Testing Requirements**

1. Compliance with the emission limitations specified in this permit shall be determined in accordance with the following methods:

Emission Limitation-  
7.12 lbs SO<sub>2</sub>/hour

**Applicable Compliance Method**

Compliance with the lbs SO<sub>2</sub>/hr emission limitation may be demonstrated by multiplying the emission factor of 1.01(S) lbs SO<sub>2</sub>/mmBtu, where S is the sulfur content of the diesel fuel oil (AP-42, Fifth Edition, Section 3.4 Large Stationary Diesel Engines, Table 3.4-1, updated 10/96) by the

maximum heat input of 14.1 mmBtu/hr.

The sulfur content of the diesel fuel oil shall be determined by the record keeping in A.III.2.

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

2. Emission Limitation-  
45.1 lbs NO<sub>x</sub>/hour

Applicable Compliance Method-

Compliance with the lbs NO<sub>x</sub>/hr emission limitation may be demonstrated by multiplying the emission factor of 3.2 lbs NO<sub>x</sub>/mmBtu (AP-42, Fifth Edition, Section 3.4 Large Stationary Diesel Engines, Table 3.4-1, updated 10/96) by the maximum heat input of 14.1 mmBtu/hr.

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

3. Emission Limitation-  
11.98 lbs CO/hour

Applicable Compliance Method-

Compliance with the lbs CO/hr emission limitation may be demonstrated by multiplying the emission factor of 0.85 lb CO/mmBtu (AP-42, Fifth Edition, Section 3.4 Large Stationary Diesel Engines, Table 3.4-1, updated 10/96) by the maximum heat input of 14.1 mmBtu/hr.

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

4. Emission Limitation-  
1.27 lbs VOC/hour

Applicable Compliance Method-

Compliance with the lbs VOC/hr emission limitation may be demonstrated by multiplying the emission factor of 0.09 lb VOC/mmBtu (AP-42, Fifth Edition, Section 3.4 Large Stationary Diesel Engines, Table 3.4-1, updated 10/96) by the maximum heat input of 14.1 mmBtu/hr.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

5. Emission Limitation-  
Visible emissions shall not exceed twenty percent opacity, as a six-minute average, except as

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specified by rule.

**Applicable Compliance Method-**

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

6. Emission Limitation -  
Particulate emissions shall not exceed 0.35 lb/mmBtu actual heat input.

**Applicable Compliance Method -**

Compliance may be based upon an emission factor of 0.062 lb/mmBtu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.4, Table 3.4-2 (10/96).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

7. Emission Limitation -  
Sulfur dioxide emissions shall not exceed 0.50 lb/mmBtu actual heat input.

**Applicable Compliance Method -**

Compliance with the allowable sulfur dioxide emission limitation may be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

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

8. Compliance with the hours of operation limitation specified in A.II.1. shall be demonstrated by the hours of operation information collected and recorded in A.III.1.

**VI. Miscellaneous Requirements**

1. The terms and conditions of this permit to install shall supersede the terms and conditions of permit to install number 14-02713 issued December 23, 1992 and modified on May 1, 1996.

## B. State Only Enforceable Section

### I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - Diesel generator 2	OAC rule 3745-17-11(B)(5)(b)	The particulate emissions (PE) from this emissions unit shall not exceed 0.062 lb per million Btu of actual heat input.

### 2. Additional Terms and Conditions

2.a None

## II. Operational Restrictions

None

## III. Monitoring and/or Recordkeeping Requirements

None

## IV. Reporting Requirements

None

## V. Testing Requirements

- Emission Limitation -  
 Particulate emissions shall not exceed 0.062 lb/mmBtu actual heat input.

Applicable Compliance Method -

Compliance may be based upon an emission factor of 0.062 lb/mmBtu specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.4, Table 3.4-2 (10/96).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

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Emissions Unit ID: P002

**VI. Miscellaneous Requirements**

None

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

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	
P003 - Diesel generator 3	OAC rule 3745-31-05(A)(3)	OAC rule 3745-17-11(B)(5)
		OAC rule 3745-18-06(G)
		OAC rule 3745-23-06(B)
	OAC rule 3745-31-05(D)	
	OAC rule 3745-17-07(A)	

Applicable Emissions  
Limitations/Control  
Measures

This nitrogen oxide emissions from this emissions unit shall not exceed 45.1 lbs per hour.\*

7.12 lbs SO<sub>2</sub>/hr\*

11.98 lbs CO/hr\*

1.27 lbs VOC/hr\*

\*This emission limitation is based on the emissions unit's potential to emit. Therefore, no record keeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limit.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), OAC rule 3745-17-07(A) and OAC rule 3745-17-11(B)(5).

See A.II

Visible emissions shall not exceed twenty percent opacity, as a six-minute average, except as specified by rule.

The PE(PM) from this emissions unit shall not exceed 0.35 lb per million

Btu of actual heat input.

The sulfur dioxide emission limitation specified in OAC 3745-18-06(G) is equivalent to the sulfur dioxide emission limitation established in accordance with OAC rule 3745-31-05(A)(3).

See A.I.2.c

**2. Additional Terms and Conditions**

**2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by limited operating hours.

**2.b** The total combined emissions from emissions units P001-P003 shall not exceed the following based on a rolling, 12-month summation:

5.18 TPY PE/PM10 \*

1.33 TPY VOC

12.6 TPY CO

47.4 TPY NO<sub>x</sub>

7.5 TPY SO<sub>2</sub>

\*For purposes of Prevention of Significant Deterioration applicability, all PM10 emissions are assumed to be PE.

**2.c** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 by committing to comply with the synthetic minor limitations established pursuant to OAC rule 3745-31-05(D) and 3745-31-05(A)(3) in Permit to Install 14-2713.

**II. Operational Restrictions**

1. The total hours of operation for emissions units P001-P003, combined, shall not exceed 2,100 hours per year based upon a rolling, 12-month summation.
2. The quality of diesel fuel burned in this emissions unit shall have a combination of heat and sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.50 lb SO<sub>2</sub>/mmBtu of actual heat input.

Compliance with the above-mentioned specification shall be determined by using analytical results provided by the permittee or oil supplier for each shipment of diesel fuel.

3. The permittee shall burn only diesel fuel in this emissions unit.

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### **III. Monitoring and/or Recordkeeping Requirements**

1. The permittee shall collect and record the following information on a monthly basis:
  - a. The total hours of operation for emissions units P001-P003, combined.
  - b. The rolling 12-month summation\* of the hours of operation recorded pursuant to A.III.1.a (i.e., the current month's total added to the previous 11-month total).

\*The rolling, twelve-month summation shall be calculated by adding the hours of operation for the current month to the total hours of operation during the previous eleven-months.

2. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

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

The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

- a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

## b. Alternative 2:

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

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

**IV. Reporting Requirements**

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record that shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from Section A.III above. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than diesel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedences of the rolling, twelve-month operating hours limitation listed in A.II.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

**V. Testing Requirements**

1. Compliance with the emission limitations specified in this permit shall be determined in accordance with the following methods:

Emission Limitation-  
7.12 lbs SO<sub>2</sub>/hour

## Applicable Compliance Method

Compliance with the lbs SO<sub>2</sub>/hr emission limitation may be demonstrated by multiplying the emission factor of 1.01(S) lbs SO<sub>2</sub>/mmBtu, where S is the sulfur content of the diesel fuel oil (AP-42, Fifth Edition, Section 3.4 Large Stationary Diesel Engines, Table 3.4-1, updated 10/96) by the

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maximum heat input of 14.1 MMBtu/hr.

The sulfur content of the diesel fuel oil shall be determined by the record keeping in A.III.2.

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

2. Emission Limitation-  
45.1 lbs NO<sub>x</sub>/hour

Applicable Compliance Method-

Compliance with the lbs NO<sub>x</sub>/hr emission limitation may be demonstrated by multiplying the emission factor of 3.2 lbs NO<sub>x</sub>/mmBtu (AP-42, Fifth Edition, Section 3.4 Large Stationary Diesel Engines, Table 3.4-1, updated 10/96) by the maximum heat input of 14.1 MMBtu/hr.

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

3. Emission Limitation-  
11.98 lbs CO/hour

Applicable Compliance Method-

Compliance with the lbs CO/hr emission limitation may be demonstrated by multiplying the emission factor of 0.85 lb CO/mmBtu (AP-42, Fifth Edition, Section 3.4 Large Stationary Diesel Engines, Table 3.4-1, updated 10/96) by the maximum heat input of 14.1 MMBtu/hr.

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

4. Emission Limitation-  
1.27 lbs VOC/hour

Applicable Compliance Method-

Compliance with the lbs VOC/hr emission limitation may be demonstrated by multiplying the emission factor of 0.09 lb VOC/mmBtu (AP-42, Fifth Edition, Section 3.4 Large Stationary Diesel Engines, Table 3.4-1, updated 10/96) by the maximum heat input of 14.1 MMBtu/hr.

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If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

5. Emission Limitation-

Visible emissions shall not exceed twenty percent opacity, as a six-minute average, except as specified by rule.

Applicable Compliance Method-

If required, compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

6. Emission Limitation -

Particulate emissions shall not exceed 0.35 lb/mmBtu actual heat input.

Applicable Compliance Method -

Compliance may be based upon an emission factor of 0.062 lb/mmBtu. This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.4, Table 3.4-2 (10/96).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

7. Emission Limitation -

Sulfur dioxide emissions shall not exceed 0.50 lb/mmBtu actual heat input.

Applicable Compliance Method -

Compliance with the allowable sulfur dioxide emission limitation may be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

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

8. Compliance with the hours of operation limitation specified in A.II.1. shall be demonstrated by the hours of operation information collected and recorded in A.III.1.

## VI. Miscellaneous Requirements

1. The terms and conditions of this permit to install shall supersede the terms and conditions of permit to install number 14-02713 issued December 23, 1992 and modified on May 1, 1996.

**B. State Only Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - Diesel generator 3	OAC rule 3745-17-11(B)(5)(b)	The particulate emissions (PE) from this emissions unit shall not exceed 0.062 lb per million Btu of actual heat input.

**2. Additional Terms and Conditions**

- 2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

1. Emission Limitation -  
Particulate emissions shall not exceed 0.062 lb/mmBtu actual heat input.

Applicable Compliance Method -

Compliance may be based upon an emission factor of 0.062 lb/mmBtu specified in USEPA

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reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.4, Table 3.4-2 (10/96).

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

**VI. Miscellaneous Requirements**

None