



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

1/5/2016

Certified Mail

Dean Headley
 Cummins Bridgeway, LLC.
 4000 Lyman Dr
 Hilliard, OH 43026

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

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0125124017
 Permit Number: P0119847
 Permit Type: Initial Installation
 County: Franklin

Dear Permit Holder:

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

Andrew Hall and Ohio EPA DAPC, Central District Office
 Permit Review/Development Section 50 West Town Street, 6th Floor
 Ohio EPA, DAPC P.O. Box 1049
 50 West Town Street Suite 700 Columbus, OH 43216-1049
 PO Box 1049
 Columbus, Ohio 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
 Ohio EPA-CDO

Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

2000 hp engine dynamometer (P001) located at Cummins Bridgeway (4000 Lyman Dr Hilliard, OH 43026). This is the first source at this facility to obtain a permit. This source was installed in 1981 and the application is for an initial installation.

3. Facility Emissions and Attainment Status:

This facility is located in Franklin County which is in marginal non-attainment status for the 2008 ozone standard. The facility is also located in an area not listed in Appendix A of OAC rule 3745-17-08. At the time of installation of P001 (1981), the county was in full attainment. The facility is taking federally enforceable restrictions to avoid Title V and PSD.

Facility-wide emissions include PM, PM_{2.5}, PM₁₀, NO_x, CO, SO₂, and VOC from the permitted source (P001) and from exempt sources. The facility has requested a limit of 52,000 gallons diesel fuel per year to use in all sources to avoid Title V. That limit was established with corresponding monthly and 12-month rolling period limits for individual pollutants based upon AP-42 either section 3.3 table 3.3-1 or section 3.4 table 3.4-1, depending on which emission factor was higher. The higher emission factor was used to account for the worst-case scenario.

P001	PM	PM _{2.5}	PM ₁₀	NO _x	CO	SO ₂	VOC
FE Limits (tpy)	1.1	1.1	1.1	15.7	3.4	1.0	1.2
Uncontrolled (tpy)	11.9	11.9	11.9	291.9	65.8	23.4	12.7

4. Source Emissions:

The following ton per year limits and pound per hour limits were established based upon the maximum horsepower of 2000 for this unit and emission factors from AP-41 section 3.4 table 3.4-1.

P001	PM	PM _{2.5}	PM ₁₀	NO _x	CO	SO ₂	VOC
Uncontrolled (tpy)	6.1	6.1	6.1	210.2	48.2	18.0	6.2
BAT Limits (lb/hr)	1.4	1.4	1.4	48	11	4.1	1.4

5. Conclusion:

The issuance of P0119847 is recommended.



6. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Rolling 12-Month Period</u>
PM	1.1
PM _{2.5}	1.1
PM ₁₀	1.1
NO _x	15.7
CO	3.4
SO ₂	1.0
VOC	1.24

PUBLIC NOTICE

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

Draft Air Pollution Permit-to-Install and Operate Initial Installation
Cummins Bridgeway, LLC.

4000 Lyman Dr., Hilliard, OH 43026

ID#:P0119847

Date of Action: 1/5/2016

Permit Desc:Initial installation FEPTIO for an already-installed 2000 hp engine dynamometer..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Stephanie Habinak, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Cummins Bridgeway, LLC.**

Facility ID:	0125124017
Permit Number:	P0119847
Permit Type:	Initial Installation
Issued:	1/5/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Cummins Bridgeway, LLC.

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Draft Permit-to-Install and Operate

Cummins Bridgeway, LLC.

Permit Number: P0119847

Facility ID: 0125124017

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0125124017
Application Number(s): A0054730
Permit Number: P0119847
Permit Description: Initial installation FEPTIO for an already-installed 2000 hp engine dynamometer.
Permit Type: Initial Installation
Permit Fee: \$800.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 1/5/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Cummins Bridgeway, LLC.
4000 Lyman Dr
Hilliard, OH 43026

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

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

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director



Draft Permit-to-Install and Operate

Cummins Bridgeway, LLC.

Permit Number: P0119847

Facility ID: 0125124017

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0119847

Permit Description: Initial installation FEPTIO for an already-installed 2000 hp engine dynamometer.

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

Emissions Unit ID:	P001
Company Equipment ID:	P001
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
Cummins Bridgeway, LLC.
Permit Number: P0119847
Facility ID: 0125124017
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Central District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Draft Permit-to-Install and Operate
Cummins Bridgeway, LLC.
Permit Number: P0119847
Facility ID: 0125124017
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) Emissions Limitations and/or Control Requirements
 - a. The combined emissions from the burning of diesel fuel in emissions unit P001 and all other emissions units, including all de minimis emissions units as defined in OAC rule 3745-15-05, all registration status and all permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03 shall not exceed the following:
 - i. Emissions of particulate matter (PM) shall not exceed 1.1 tons per rolling, 12-month-period.
 - ii. Emissions of particulate matter less than 2.5 microns in diameter (PM_{2.5}) shall not exceed 1.1 tons per rolling, 12-month-period.
 - iii. Emissions of particulate matter less than 10 microns in diameter (PM₁₀) shall not exceed 1.1 tons per rolling, 12-month-period.
 - iv. Emissions of nitrogen oxides (NO_x) shall not exceed 15.7 tons per rolling, 12-month-period.
 - v. Emissions of carbon monoxide (CO) shall not exceed 3.4 tons per rolling, 12-month-period.
 - vi. Emissions of sulfur dioxide (SO₂) shall not exceed 1.0 tons per rolling, 12-month-period.
 - vii. Emissions of volatile organic compounds (VOC) shall not exceed 1.2 tons per rolling, 12-month-period.
 - (2) Operational Restrictions
 - a. The facility-wide usage of diesel fuel in all emissions units, including all de minimis emissions units as defined in OAC rule 3745-15-05, all registration status and all permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03 shall not exceed 52,000 gallons per rolling, 12-month period.

(3) Monitoring and Recordkeeping Requirements

- a. The permittee shall maintain monthly records of the following information:
 - i. the facility-wide usage of diesel fuel, in gallons per month;
 - ii. the facility-wide PM emissions, in tons per month;
 - iii. the facility-wide PM_{2.5} emissions, in tons per month;
 - iv. the facility-wide PM₁₀ emissions, in tons per month;
 - v. the facility-wide NO_x emissions, in tons per month;
 - vi. the facility-wide CO emissions, in tons per month;
 - vii. the facility-wide SO₂ emissions, in tons per month;
 - viii. the facility-wide VOC emissions, in tons per month;
 - ix. the rolling, 12-month summation of facility-wide usage of diesel fuel, in gallons;
 - x. the rolling, 12-month summation of facility-wide PM emissions, in tons;
 - xi. the rolling, 12-month summation of facility-wide PM_{2.5} emissions, in tons;
 - xii. the rolling, 12-month summation of facility-wide PM₁₀ emissions, in tons;
 - xiii. the rolling, 12-month summation of facility-wide NO_x emissions, in tons;
 - xiv. the rolling, 12-month summation of facility-wide CO emissions, in tons;
 - xv. the rolling, 12-month summation of facility-wide SO₂ emissions, in tons;
and
 - xvi. the rolling, 12-month-summation of facility-wide VOC emissions, in tons.

(4) Reporting Requirements

- a. The permittee shall submit quarterly deviation (excursion) reports that identify:
 - i. All deviations (excursions) of the following emission limitation, operation restrictions, and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:
 - (a) all exceedances of the rolling, 12-month facility-wide diesel fuel limitation;

- (b) all exceedances of the rolling, 12-month facility-wide PM emissions limitation;
 - (c) all exceedances of the rolling, 12-month facility-wide PM_{2.5} emissions limitation;
 - (d) all exceedances of the rolling, 12-month facility-wide PM₁₀ emissions limitation;
 - (e) all exceedances of the rolling, 12-month facility-wide NO_x emissions limitation;
 - (f) all exceedances of the rolling, 12-month facility-wide CO emissions limitation;
 - (g) all exceedances of the rolling, 12-month facility-wide SO₂ emissions limitation; and
 - (h) all exceedances of the rolling, 12-month facility-wide VOC emissions limitation.
- ii. the probable cause of each deviation (excursion).
 - iii. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions).
 - iv. The magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June) and October 31 (covering July to September), unless an alternative schedule has been established and approved by the director (the Ohio EPA, Central District Office).

(5) Testing Requirements

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

PM emissions shall not exceed 1.1 tons per rolling, 12-month period.
PM_{2.5} emissions shall not exceed 1.1 tons per rolling, 12-month period.
PM₁₀ emissions shall not exceed 1.1 tons per rolling, 12-month period.
NO_x emissions shall not exceed 15.7 tons per rolling, 12-month period.
CO emissions shall not exceed 3.4 tons per rolling, 12-month period.



Draft Permit-to-Install and Operate

Cummins Bridgeway, LLC.

Permit Number: P0119847

Facility ID: 0125124017

Effective Date: To be entered upon final issuance

SO₂ emissions shall not exceed 1.0 tons per rolling, 12-month period.
VOC emissions shall not exceed 1.2 tons per rolling, 12-month period.

Applicable Compliance Method:

The rolling, 12-month emissions limitations were established using the 52,000 gallon operational restriction established in B.1.b)(2) and the worst case emissions factors available in AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 3.3, Tables 3.3-1 and 3.4-1 (9/98). Compliance with these limitations is determined using the recordkeeping required by B.1.b)(3) and the following emissions factors for each pollutant:

<u>Pollutant</u>	<u>Emissions factor (lb/1000 gal)</u>
PM	42.48
PM _{2.5}	42.48
PM ₁₀	42.48
NO _x	604.3
CO	130.18
SO ₂	39.74
VOC	47.96



Draft Permit-to-Install and Operate
Cummins Bridgeway, LLC.
Permit Number: P0119847
Facility ID: 0125124017
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions

1. P001, P001

Operations, Property and/or Equipment Description:

Engine dynamometer capable of testing up to 2000 hp

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	See b)(2)a. below.
b.	OAC rule 3745-17-11(B)(5)	See b)(2)b. below
c.	OAC rule 3745-31-05(A)(3)	<p>Emissions of particulate matter (PM) from the burning of diesel fuel in emissions unit P001 shall not exceed 1.4 pounds per hour.</p> <p>Emissions of nitrogen oxides (NO_x) from the burning of diesel fuel in emissions unit P001 shall not exceed 48 pounds per hour.</p> <p>Emissions of carbon monoxide (CO) from the burning of diesel fuel in emissions unit P001 shall not exceed 11 pounds per hour.</p> <p>Emissions of sulfur dioxide (SO₂) from the burning of diesel fuel in emissions unit</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		P001 shall not exceed 4.1 pounds per hour. Emissions of volatile organic compounds (VOC) from the burning of diesel fuel in emissions unit P001 shall not exceed 1.4 pounds per hour. See b)(2)c. below.
d.	OAC rule 3745-31-05(D) (Federally enforceable limitations to avoid Title V and PSD)	See Facility-Wide Terms and Conditions B.1.b) above.

(2) Additional Terms and Conditions

- a. Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except:
 - i. visible particulate emissions may exceed 20 percent opacity, as a six-minute average, for not more than six consecutive minutes in any 60 minutes; but
 - ii. shall not exceed 60 percent opacity, as a six-minute average, at any time; and
 - iii. the presence of uncombined water shall not be deemed a violation for failure of stack emissions meeting this requirement.
- b. Particulate matter emissions shall not exceed:
 - i. 0.310 pound per million Btu of actual heat input for a stationary small internal combustion engine less than or equal to 600 hp; and
 - ii. 0.062 pound per million Btu of actual heat input for a stationary large internal combustion engine greater than 600 hp.
- c. The hourly emissions limitations were established to reflect the potential-to-emit for each pollutant for this emissions unit. It is not necessary to develop monitoring, recordkeeping, or reporting requirements to ensure compliance with these limitations.

(3) Operational Restrictions

- a. The permittee shall burn only No. 2 fuel oil in this emissions unit.

(4) Monitoring and/or Recordkeeping Requirements

- a. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- i. the color of the emissions;
 - ii. whether the emissions are representative of normal operations;
 - iii. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - iv. the total duration of any visible emissions incident; and
 - v. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (5) For each day during which the permittee burns a fuel other than No. 2 diesel fuel, the permittee shall maintain a record of the type, percent of sulfur content, and quantity of fuel burned in this emissions unit.

c) Reporting Requirements

- (1) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid

electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

In addition to the reporting the information as required by the PER instructions, the permittee shall provide the following additional information in the PER:

- a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit;
- b. any corrective actions taken to minimize or eliminate the visible particulate emissions; and
- c. any deviation from the requirement to burn only No. 2 diesel fuel in this emissions unit.

d) **Testing Requirements**

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

a. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except visible particulate emissions may exceed 20 percent opacity, as a six-minute average, for not more than six consecutive minutes in any 60 minutes; but shall not exceed 60 percent opacity, as a six-minute average, at any time.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

b. Emission Limitation:

Particulate matter emissions shall not exceed:

- i. 0.310 pound per million Btu of actual heat input for a stationary small internal combustion engine less than or equal to 600 hp; and
- ii. 0.062 pound per million Btu of actual heat input for a stationary large internal combustion engine greater than 600 hp.



Applicable Compliance Method:

If required, compliance with the emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

c. Emission Limitation:

PM emissions from the burning of diesel fuel shall not exceed 1.4 pounds per hour.

Applicable Compliance Method:

Compliance is inherent based upon AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96) emission factor of 0.000721 lb/hp-hr.

If required, compliance with the emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

d. Emission Limitation:

NO_x emissions from the burning of diesel fuel shall not exceed 48 pounds per hour.

Applicable Compliance Method:

Compliance is inherent based upon AP-42, Fifth Edition, Section 3.4, Table 3.4-1 (revised 10/96) emissions factor of 0.024 lb/hp-hr.

If required, compliance with the emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7E.

e. Emission Limitation:

CO emissions from the burning of diesel fuel shall not exceed 11 pounds per hour.

Applicable Compliance Method:

Compliance is inherent based upon AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96) emissions factor of 0.00696 lb/hp-hr.

If required, compliance with the emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

f. Emission Limitation:

SO₂ emissions from the burning of diesel fuel shall not exceed 4.1 pounds per hour.



Draft Permit-to-Install and Operate

Cummins Bridgeway, LLC.

Permit Number: P0119847

Facility ID: 0125124017

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

Compliance is inherent based upon AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96) emissions factor of 0.00205 lb/hp-hr.

If required, compliance with the emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6C.

g. Emission Limitation:

VOC emissions from the burning of diesel fuel shall not exceed 1.4 pounds per hour.

Applicable Compliance Method:

Compliance is inherent based upon AP-42, Fifth Edition, Section 3.3, Table 3.3-1 (revised 10/96) emissions factor of 0.0025141 lb/hp-hr.

If required, compliance with the emissions limitation shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25/25A.

e) Miscellaneous Requirements

- (1) None.