Ohio Environmental Protection Agency

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

3/23/2016

Certified Mail

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

Marc Divis
Cleveland Thermal LLC
1921 Hamilton Avenue
Cleveland, OH 44114-3515

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1318000246
Permit Number: P0120383
Permit Type: Administrative Modification
County: Cuyahoga

Dear Permit Holder:

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

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

and

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted.Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now.If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

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

Cc: U.S. EPA Region 5 -*Via E-Mail Notification*
CDAQ; Pennsylvania; Canada

Permit Strategy Write-Up

1. Check all that apply:

   _X_Synthetic Minor Determination (to avoid PSD and NNSR)

   Netting Determination

2. Source Description:

   The Cleveland Thermal LLC is a primary producer of commercial/institutional steam heat and hot water for the downtown area in Cleveland, Ohio. Cleveland Thermal has submitted an application for an administrative modification Permit to Install that will contain federally enforceable restrictions on the potential to emit. The operation covered by this permit modification application is a 182.0 mmBtu/hr natural gas fired boiler (B008) equipped with low NO_x burners and flue gas recirculation for steam heating and cooling.

   In addition, emission contributions from proposed new boilers, B009 and B010, which are identical to B008, are included in this Permit Strategy Write-Up. All three boilers combined have been considered as a single "project" for purposes of evaluating Prevention of Significant Deterioration (PSD) and Nonattainment New Source Review (NNSR) applicability.

3. Facility Emissions and Attainment Status:

   This facility has the potential to emit (PTE) sulfur dioxde (SO_2), particulate emissions (PE), carbon monoxide (CO), and nitrogen oxide (NO_x) emissions in excess of 100 tons/year which makes this a major facility for PSD and NNSR.

   Cuyahoga County is currently designated as non-attainment for ozone, $PM_{2.5}$, and partial non-attainment for lead.

4. Source Emissions:

   Emission units B008, B009, and B010 have the combined maximum potential to emit as follows:

CO (tons/year)	NOx (tons/year)	PM_{10} (tons/year)	$PM_{2.5}$ (tons/year)	VOC (tons/year)	SO_2 (tons/year)	Lead (tons/year)
95.7	86.1	18.2	18.2	9.6	1.4	0.001

   In accordance with the PSD and NNSR regulations, the "significant" thresholds are the following:

CO (tons/year)	NOx (tons/year)	PM_{10} (tons/year)	$PM_{2.5}$ (tons/year)	VOC (tons/year)	SO_2 (tons/year)	Lead (tons/year)
100	40	15	10	40	40	0.6

Per the above tables, the NOx, PM_{10}, and $PM_{2.5}$ potential to emit exceeds the "significant" thresholds which would result in PSD and NNSR applicability. However, the facility has requested a Synthetic Minor Permit to Install that will contain federally enforceable restrictions in order to avoid PSD and NNSR permitting. The facility has requested an annual natural gas usage restriction of 2,630.0 mmcf per rolling, 12-month period for emissions units B008, B009, and B010 combined. The allowable requested will be 39.9 tons/year of NO_x and 9.99 tons/year of $PM_{10}/PM_{2.5}$ emissions based on the rolling, 12-month summation of the natural gas usage rates for B008, B009, and B010 combined, and the use of the data obtained from the CEMS for determining the NO_x emissions.

5. Conclusion:

By limiting the annual natural gas usage rate for emissions units B008, B009, and B010 combined to 2,630.0 mmcf per rolling, 12-month period, and monitoring the NO_x emissions based on the CEMS data per rolling, 12-month period, Cleveland Thermal LLC will not be subject to the PSD or NNSR permitting requirements.

6. Please provide additional notes or comments as necessary:

The pending PTI (P0119959) for new emissions units B009 and B010 will include the same federally enforceable restrictions on fuel usage and emission limits as are being included in this permit modification for B008.

Since PSD is not triggered for any of the criteria pollutants, it was not necessary to evaluate PSD applicability for greenhouse gas emissions in accordance with the June 23, 2014 U.S. Supreme Court ruling.

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

Pollutant	Tons Per Year
NO_x	39.9
$PM_{10}/PM_{2.5}$	9.99
VOC	3.19

PUBLIC NOTICE

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

Draft Air Pollution Permit-to-Install Administrative Modification
Cleveland Thermal LLC
1921 Hamilton Avenue,, Cleveland, OH 44114-3515
ID#:P0120383
Date of Action: 3/23/2016
Permit Desc:PTI administrative modification for emissions unit B008 which is a 182.0 mmBtu/hr natural gas-fired boiler equipped with low NOx burners and flue gas recirculation for steam heating and cooling to include synthetic minor limitations for NOx and particulate emissions..
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: David Hearne, Cleveland Division of Air Quality, 2nd Floor 75 Erieview Plaza, Cleveland, OH 44114. Ph: (216)664-2297

DRAFT

Division of Air Pollution Control
Permit-to-Install
for
Cleveland Thermal LLC

Facility ID:	1318000246
Permit Number:	P0120383
Permit Type:	Administrative Modification
Issued:	3/23/2016
Effective:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
Cleveland Thermal LLC

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Authorization

Facility ID:	1318000246
Facility Description:	
Application Number(s):	M0003830
Permit Number:	P0120383
Permit Description:	PTI administrative modification for emissions unit B008 which is a 182.0 mmBtu/hr natural gas-fired boiler equipped with low NOx burners and flue gas recirculation for steam heating and cooling to include synthetic minor limitations for NOx and particulate emissions.
Permit Type:	Administrative Modification
Permit Fee:	$500.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	3/23/2016
Effective Date:	To be entered upon final issuance

This document constitutes issuance to:

Cleveland Thermal LLC
1921 Hamilton Avenue
Cleveland, OH 44114-3515

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

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

Cleveland Division of Air Quality
2nd Floor
75 ErieviewPlaza
Cleveland, OH 44114
(216)664-2297

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0120383
Permit Description: PTI administrative modification for emissions unit B008 which is a 182.0 mmBtu/hr natural gas-fired boiler equipped with low NOx burners and flue gas recirculation for steam heating and cooling to include synthetic minor limitations for NOx and particulate emissions.

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

Emissions Unit ID:	**B008**
Company Equipment ID:	Hamilton Boiler #7
Superseded Permit Number:	P0117210
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

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

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

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

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

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

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

4. Monitoring and Related Record Keeping and Reporting Requirements

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

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

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

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

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

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Cleveland Division of Air Quality.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Cleveland Division of Air Quality. The written reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted to the Cleveland Division of Air Quality every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

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

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

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

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

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

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

c) The permittee shall submit progress reports to the Cleveland Division of Air Quality concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

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

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

7. Best Available Technology

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

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

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 theCleveland Division of Air Quality. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s)not exempt from the requirement to obtain a Permit-to-Install.

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

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

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d)must be <u>obtained before</u>operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

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

a) Completion of initial installation date shall be enteredupon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

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

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

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

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart DDDDD. The final rules found in 40 CFR Part 63, Subpart DDDDD establish national emission standards for hazardous air pollutants (NESHAP), operational limits, work practice standards, and compliance requirements for industrial, commercial, and institutional boilers located at a major source of hazardous air pollutants (HAP). The permittee shall comply with the requirements and limits of this NESHAP for the facility's new (commenced construction after 6/4/10) boilers by the compliance date listed in 40 CFR Part 63, Subpart DDDDD, or upon startup, whichever is later.

3. The permittee shall comply with the applicable provisions of the New Source Performance Standards (NSPS) for Industrial-Commercial-Institutional Steam Generating Units, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 60, Subpart Db.

C. Emissions Unit Terms and Conditions

1. B008, Hamilton Boiler #7

Operations, Property and/or Equipment Description:

Natural gas fired boiler rated at 150,000 lbs steam per hour and 182 MMBtu/hr heat input equipped with Low NO_x Burners (LNB) and Flue Gas Recirculation (FGR)

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

(1) b)(1)c. and b)(2)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 3745-31-05(A)(3) June 30, 2008 ORC 3704.03(T) PTI P0117210 issued 2/3/2015	See b)(2)a. and b)(2)b. below.
b.	OAC rule 3745-31-05(A)(3) June 30, 2008 ORC 3704.03(T) PTI P0117210 issued 2/3/2015	Volatile organic compound (VOC) emissions shall not exceed 0.27 ton per month averaged over a 12-month rolling period. Particulate emissions (PM_{10}/$PM_{2.5}$) shall not exceed 0.51 ton per month averaged over a 12-month rolling period. See b)(2)c. below.
c.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the total particulate and VOC emissions from this air contaminant source since the potential to emit is less than 10 tons per year. See b)(2)d. below.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05 (D) Synthetic Minor to avoid PSD and NNSR	Nitrogen oxide (NO_x) emissions shall not exceed 39.9 tons per rolling, 12-month period for B008, B009, and B010 combined based on the data obtained from the NO_x CEMS. See c)(2) below. Particulate emissions (PM_{10}/$PM_{2.5}$) shall not exceed 9.99 tons per rolling, 12-month period for B008, B009, and B010 combined. See c)(3) below.
e.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
f.	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.020 lb/mmBtu.
g.	OAC rule 3745-110-03(C)	Nitrogen oxide (NO_x) emissions shall not exceed 0.10 lb/mmBtu.
h.	40 CFR Part 60 Subpart Db	Nitrogen oxide (NO_x) emissions shall not exceed 0.20 lb/mmBtuas a rolling, 30-day average.
i.	40 CFR Part 63 Subpart DDDDD, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters.	See b)(2)e. below.
j.	40 CFR Part 63 Subpart A	Table 10 to Subpart DDDDD of 40 CFR Part 63 – Applicability of General Provisions to Subpart DDDDD.

(2) Additional Terms and Conditions

a. The natural gas-fired boiler shall be equipped with Low NO_x Burners (LNB) and Flue Gas Recirculation (FGR) equipment that is designed to meet a NO_x emission rate of 30 ppmv dry basis, corrected to 3% oxygen and 0.036 lb/mmBtu which satisfies the BAT source design characteristic requirement. This is based

on the boiler manufacturer's information submitted as part of the permittee's application for a permit to install.

b. The permittee shall employ good combustion practices and the boiler shall be equipped with proper burner design in order to meet the CO emission rate of 100 ppmv dry basis, corrected to 3% oxygen and 0.040 lb/mmBtu which satisfies the BAT source design characteristic requirement. This is based on the boiler manufacturer's information submitted as part of the permittee's application for a permit to install.

c. These Best Available Technology (BAT) emission limits apply until U.S. EPA approves Ohio Adminstrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

d. These requirements apply once U.S. EPA approves paragraph 3745-31-05(A)(3)(a)(ii) (less than 10 tons per year BAT exemption) as part of the Ohio SIP.

e. This boiler is designed to only burn gas 1 fuels (subcategory) and therefore is not subject to the emission limits in Table 1 and 2 or 11 through 13 of Subpart DDDDD or the operating limits in Table 4 to the Subpart. However, the boiler is subject to annual tune-up requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the Subpart.

f. Each continuous NO_x monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6. At least 45 days before commencing certification testing of the continuous NO_x monitoring system(s), the permittee shall develop and maintain a written quality assurance/quality control plan designed to ensure continuous valid and representative readings of NO_x emissions from the continuous monitor(s), in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous NO_x monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

g. The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

h. OAC rule 3745-18-06 does not establish a sulfur dioxide emission limitation for this "fuel burning equipment" because it only employs natural gas as fuel.

c) Operational Restrictions

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

(2) The permittee shall operate and maintain equipment to continuously monitor and record NO_x emissions from this emissions unit pursuant to 40 CFR Part 60 Subpart Db.

(3) The maximum annual natural gas usage rate for emissions units B008, B009, and B010 combined, shall not exceed 2,630.0 mmcf, based upon a rolling, 12-month summation of the natural gas usage rates.

To ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the usage levels specified in the following table:

Month	Maximum Allowable Cumulative Natural Gas Usage in mmcf
1	135.4
1-2	270.8
1-3	406.2
1-4	657.5
1-5	1,315.0
1-6	1,972.5
1-7	2,630.0
1-8	2,630.0
1-9	2,630.0
1-10	2,630.0
1-11	2,630.0
1-12	2,630.0

After the first 12 calendar months of operation, compliance with the annual natural gas usage rate limitation shall be based upon a rolling, 12-month summation of the natural gas usage rates of B008, B009, and B010 combined.

(4) The permittee shall maintain the boiler in accordance with the manufacturer's recommendations in order to ensure that the boiler continues to operate as designed.

d) Monitoring and/or Recordkeeping Requirements

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

(2) Prior to the installation of the continuous NO_x monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2. The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous NO_x monitoring system meets the requirements of Performance Specification 2. Once received, the letter(s)/document(s) of certification shall be maintained on-site and shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

(3) The permittee shall install, operate, and maintain equipment to continuously monitor and record NO_x emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

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

a. emissions of NO_x in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;

b. emissions of NO_x in units of the applicable standard(s) in the appropriate averaging period;

c. results of quarterly cylinder gas audits or linearity checks;

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

e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);

f. hours of operation of the emissions unit, continuous NO_x monitoring system, and control equipment;

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

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

i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

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

(4) The permittee shall maintain monthly records of the following information for emissions units B008, B009, and B010 combined:

a. the natural gas usage rate for each month, in mmcf;

b. the NO_x emission rate, in tons/month, calculated by multiplying the lb of NO_x/mmBtu value determined from the NO_x CEMS (30 day average) by the actual natural gas usage rate (mmcf/month) and the heat content of the natural gas (1,000 Btu/cf) and divide by 2,000 lbs/ton;

c. the particulate emissions rate, in tons/month, calculated by multiplying the U.S. EPA AP-42 particulate emission factor (7.6 lbs/mmcf) by the actual natural gas usage rate (mmcf/month) and divide by 2,000 lbs/ton;

d. the rolling, 12-month summation of the natural gas usage rates in, mmcf;

e. the rolling, 12-month summation of the NO_x emissions; and

f. the rolling, 12-month summation of the particulate emissions.

Also, during the first 12 calendar months of operation, the permittee shall record the cumulative natural gas usage rate for each calendar month for emissions units B008, B009, and B010 combined.

(5) The permittee shall comply with the applicable work practice standards required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

Applicable Rule	Requirement
63.7515(d)	Time periods for performing tune ups
63.7540(a)(10) and Table 3	Annual tune up requirements

e) Reporting Requirements

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

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of NO_x emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapters 3745-14 and 3745-110, and any other applicable rules or regulations.

The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).

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

i. the facility name and address;

ii. the manufacturer and model number of the continuous NO_x and other associated monitors;

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

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

v. the total NO_x emissions for the calendar quarter (tons);

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

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

viii. results and date of quarterly cylinder gas audits;

ix. unless previously submitted, results and date of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));

x. unless previously submitted, the results of any relative accuracy test audit showing the continuous NO_x monitor out-of-control and the compliant results following any corrective actions;

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

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

xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

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

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

** Each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit.

(2) Pursuant to the NSPS, the permittee is required to report the following information at the appropriate times (if the information has not already been reported):

a. construction date (no later than 30 days after such date);

b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

c. actual start-up date (within 15 days after such date); and,

d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to the Cleveland Division of Air Quality (Cleveland DAQ) and to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
Lazarus Government Center
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

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

a. all exceedances of the rolling, 12-month summation of the natural gas usage rates, the rolling, 12-month summation of the NO_x emissions, and the rolling, 12-month summation of the PE emissions for emissions units B008, B009, and B010 combined; and

b. for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative natural gas usage rates for emissions units B008, B009, and B010 combined.

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

(4) The permittee shall comply with the applicable reporting requirements under 40 CFR Part 63, Subpart DDDDD, including the following sections:

Applicable Rule	Requirement
63.7530(d)	Submit notification of tune up

63.7545(e)(1) and (8)	Submit notification of compliance status
63.7550(a),(b), and (c)	Submit reports

(5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emission Limitation:
Volatile organic compound (VOC) emissions shall not exceed 0.27 ton/month averaged over a 12-month rolling period.

Applicable Compliance Method:
The monthly average emissions limitation was established by multiplying the maximum annual natural gas usage rate (1,594.32 mmcf/rolling, 12-month summation) by the boiler manufacturer emission factor for VOC emissions (0.004 lb of VOC/mmBtu) and the heat content of natural gas (1,000 Btu/cf) and dividing by 2,000 lbs/ton and divide by 12 months.

b. Emission Limitation:
Particulate emissions (PM_{10}/$PM_{2.5}$) shall not exceed 0.51 ton/month averaged over a rolling, 12-month period.

Applicable Compliance Method:
The monthly average emissions limitation was established by multiplying the maximum annual natural gas usage rate (1,594.32 mmcf/rolling, 12-month summation) by the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.4 Table 1.4-2 (7/98) emission factor for particulates (7.6 lbs/mmcf) and dividing by 2,000 lbs/ton and divide by 12 months.

c. Emission Limitation:
Nitrogen oxide (NO_x) emissions shall not exceed 39.9 tons per rolling, 12-month period for B008, B009, and B010 combined.

Applicable Compliance Method:
Compliance with this annual limitation shall be based upon the recordkeeping requirements specified in d)(4) of this permit and shall be the sum of the monthly NO_x emission rates for each rolling, 12-month period.

d. Emission Limitation:
Particulate emissions (PM_{10}/$PM_{2.5}$) shall not exceed 9.99 tons per rolling, 12-month period for B008, B009, and B010 combined.

Applicable Compliance Method:
Compliance with this annual limitation shall be based upon the recordkeeping requirements specified in d)(4) of this permit and shall be the sum of the monthly particulate emission rates for each rolling, 12-month period.

e. Emission Limitation:
Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:
Compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

f. Emission Limitation:
Particulate emissions (PE) shall not exceed 0.020 lb/mmBtu.

Applicable Compliance Method:
Compliance with the lb/mmBtu emission limitation shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (0.182 mmcf/hr) by the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.4 Table 1.4-2 (7/98) emission factor for particulates (1.9 lbs/mmcf) and dividing by the maximum hourly heat input capacity of the emissions unit (182.0 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 5.

g. Emission Limitation:
Nitrogen oxide (NO_x) emissions shall not exceed 0.10 lb/mmBtu.

Applicable Compliance Method:

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

If required, the permittee shall demonstrate compliance with the emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7, 7A, 7C, 7D, or 7E, and any additional approved USEPA methods as applicable.

h. Emission Limitation:
Nitrogen oxide (NO_x) emissions shall not exceed 0.20 lb/mmBtu. as a rolling, 30-day average.

Applicable Compliance Method:

For the initial compliance test, nitrogen oxides from the steam generating unit are monitored for 30 successive steam generating unit operating days and the 30-day average emission rate is used to determine compliance with the nitrogen oxides emission limit. The 30-day average emission rate is calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period in units of lb/mmBtu. Following the date on which the initial performance test is completed or required to be completed under 40 CFR 60.8, whichever date comes first, the owner or operator of an affected facility that has a heat input capacity of 73 MW (250 MMBtu/hr) or less and that combusts natural gas, distillate oil, gasified coal, or residual oil having a nitrogen content of 0.30 weight percent or less shall upon request determine compliance with the NO_X standards in 40 CFR 60.44b through the use of a 30-day performance test. During periods when performance tests are not requested, NO_X emissions data collected pursuant to 40 CFR 60.48b(g)(1) or 40 CFR 60.48b(g)(2) are used to calculate a 30-day rolling average emission rate on a daily basis and used to prepare excess emission reports, but will not be used to determine compliance with the NO_X emission standards. A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all of the hourly NO_X emission data for the preceding 30 steam generating unit operating days.

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

If required, the permittee shall demonstrate compliance with the emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7, 7A, 7C, 7D, or 7E, and any additional approved USEPA methods as applicable.

(2) Within 60 days of achieving the maximum production rate at which the emissions unit(s) will be operated, but not later than 180 days after initial startup, the permittee shall conduct certification tests of the continuous NO_x monitoring system in units of the applicable standard(s), to demonstrate compliance with 40 CFR Part 60, Appendix B, Performance Specification 2; and ORC section 3704.03(I).

Personnel from the Ohio EPA Central Office and the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the appropriate Ohio EPA District Office or local air agency and one copy to Ohio EPA Central Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification of the continuous NO_x monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2; and ORC section 3704.03(I).

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

g) Miscellaneous Requirements

(1) None.