Ohio Environmental Protection Agency

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

Certified Mail

3/29/2016

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

Tara Grove
Otterbein University Heating Plant
1 South Grove Street
Westerville, OH 43081

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0125234029
Permit Number: P0120462
Permit Type: Administrative Modification
County: Franklin

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding your permit, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: Ohio EPA-CDO

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Otterbein University Heating Plant

Facility ID:	0125234029
Permit Number:	P0120462
Permit Type:	Administrative Modification
Issued:	3/29/2016
Effective:	3/29/2016
Expiration:	10/27/2025

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Otterbein University Heating Plant

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

1. What does this permit-to-install and operate ("PTIO") allow me to do? 4
2. Who is responsible for complying with this permit? 4
3. What records must I keep under this permit? 4
4. What are my permit fees and when do I pay them? 4
5. When does my PTIO expire, and when do I need to submit my renewal application? 4
6. What happens to this permit if my project is delayed or I do not install or modify my source? 5
7. What reports must I submit under this permit? 5
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? 5
9. What are my obligations when I perform scheduled maintenance on air pollution control equipment? 5
10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6
11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6
12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6
13. Can I transfer this permit to a new owner or operator? 7
14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7
15. What happens if a portion of this permit is determined to be invalid? 7

B. Facility-Wide Terms and Conditions 8

C. Emissions Unit Terms and Conditions 10

1. B001, Boiler No. 1 11
2. B002, Boiler No. 2 19
3. B003, Boiler No. 3 27

Authorization

Facility ID:	0125234029
Application Number(s):	M0003867
Permit Number:	P0120462
Permit Description:	Administrative modification to correct VE check language.
Permit Type:	Administrative Modification
Permit Fee:	$1,200.00
Issue Date:	3/29/2016
Effective Date:	3/29/2016
Expiration Date:	10/27/2025

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Otterbein University Heating Plant
197 West Park Street
Westerville, OH 43081

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

Authorization (continued)

Permit Number: P0120462
Permit Description: Administrative modification to correct VE check language.

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

Emissions Unit ID:	**B001**
Company Equipment ID:	Boiler No. 1
Superseded Permit Number:	P0119355
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B002**
Company Equipment ID:	Boiler No. 2
Superseded Permit Number:	P0119355
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**B003**
Company Equipment ID:	Boiler No. 3
Superseded Permit Number:	P0119355
General Permit Category and Type:	Not Applicable

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 [DO/LAA] 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 beingpermanently shut down without first applying for and obtaining a permit pursuantto 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.

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) None.

2. The permittee is advised that this facility may be subject to the "Generally Available Control Technology" (GACT) requirements under Title 40 of the Code of Regulations, Part 63, Subpart JJJJJJ, the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources. At this time the Ohio EPA is not accepting the delegating authority to enforce the standards promulgated under the Urban Air Toxics Strategy. The requirements of this rule, that are applicable to the area source(s) (for hazardous air pollutants) identified in this permit, shall be enforceable by U.S. EPA. Region 5. The complete requirements of this Subpart (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website http://www.ecfr.gov/ or by contacting the appropriate Ohio EPA District Office or Local Air Agency.

C. Emissions Unit Terms and Conditions

1. B001, Boiler No. 1

Operations, Property and/or Equipment Description:

International-LaMont Hot Fluid Boiler model #TJW-C-25; E-Tech Heat Recovery Systems Economizer model #BV-180709-04.02 Rated Input Capacity 30.29 mmBtu/hr Natural Gas; 28.88 mmBtu/hrNo. Fuel Oil

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. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Carbon monoxide (CO) emissions shall not exceed 1.69 tons per month averaged over a twelve-month rolling period. Nitrogen oxide (NOx) emissions shall not exceed 1.37 tons per month averaged over a twelve-month rolling period. Volatile organic compound (VOC) emissions shall not exceed 0.04 tons per month averaged over a twelve-month rolling period. The Best Available Technology (BAT) requirements for PM and SO2 are equivalent to the restrictions established under OAC Rule 3745-17-10(B)(1), OAC

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Rule 3745-31-05(E), and 40 CFR Part 60 Subpart Dc. See b)(2)a. below
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to CO and SO2from this air contaminant source since the calculated annual emission rate is less than 10 tons/yr taking into account the voluntary restriction from OAC rule 3745-31-05(E). BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM, NOx, and VOC emissions from this air contaminant source since the potential to emit is less than 10 tons/year. See b)(2)b. below
c.	AC Rule 3745-17-07(A)(1)	sible emissions from steam generating units with a heat input capacity ≥ 10 MMBtu/hour and < 30 MMBtu/hour shall not exceed 20% opacity as a 6-minute average, except for one consecutive 6-minute period in any 60 minutes, but shall not exceed 60% opacity as a 6-minute average at any time.
d.	AC Rule 3745-17-10(B)(1)	M emissions shall not exceed 0.20 pound per million Btu of actual heat input while using natural gas and 0.040 pound per million Btu of actual heat input while using No. 2 fuel oil.
e.	AC rule 3745-18-06(D)	e SO_2 emissions limit specified by this rule shall is less stringent then the emissions limitation established pursuant to OAC 3745-31-05(E).
f.	AC rule 3745-31-05(E) (to avoid state modeling)	01, B002, and B003 combined shall not use more than 1,000,000 gallons of No. 2 fuel oil per rolling, 12-month period. 01, B002, and B003 combined shall not use more than 300,000 mmft^3 of natural

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		gas per rolling, 12-month period. e fuel utilized in B001, B002, and B003 shall have a sulfur content of less 0.052 lb/mmBtu of actual heat input.
g.	CFR Part 60 Subpart Dc) CFR 60.40c to 60.48c) accordance with 40 CFR 60.40c and 60.41c, this emissions unit is a steam generating unit subject to the Standards of Performance for Small Industrial, Commercial, Institutional Steam Generating Units, constructed after 6/9/89.	e steam generating unit shall be operated and maintained in continuous compliance with the emission standards and applicable requirements of 40 CFR Part 60, Subpart Dc.
h.	CFR 60.42c(d)	e permittee has committed to only burn natural gas or fuel oil that contains no more than 0.50 weight percent sulfur.

(2) Additional Terms and Conditions

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

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

c. The tons per month averaged over a twelve-month rolling period emission limitations are based on the emissions unit's potentials to emit. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with these emission limitations.

d. The SO_2 emission standards apply at all times, including periods of startup, shutdown, and malfunction. The permittee shall demonstrate compliance with the SO_2 standards by burning natural gas or fuel oils with less than or equal to 0.50% weight percent sulfur.

e. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States

Environmental Protection Agency (U.S. EPA), 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency (Ohio EPA).

c) Operational Restrictions

(1) The permittee shall burn only natural gas and/or No. 2 fuel oil in this emissions unit.

(2) The quality of No. 2 fuel oil received for burning in this emissions unit shall have a combination of sulfur content and heat content sufficient to comply with the allowable sulfur limitation of 0.052 lb/mmBtu of actual heat input and the sulfur content limitation for No. 2 fuel oil of less than or equal to 0.5 weight per cent sulfur.

(3) The maximum annual No. 2 fuel oil usage rate for B001, B002, and B003 combined shall not exceed 1,000,000 gallons per rolling, 12-month period.

(4) The maximum annual natural gas usage rate for B001, B002, and B003 combined shall not exceed 300,000 $mmft^3$ per rolling, 12-month period.

d) Monitoring and/or Recordkeeping Requirements

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

a. Alternative 1:

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

b. Alternative 2:

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

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

(2) The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.

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

a. The total volume of natural gas (mmft^3) burned in this emissions unit.

b. The total number of gallons of No. 2 fuel oil used in this boiler for each month.

c. The rolling, 12-month summation of the gallons of No. 2 fuel oil used.

d. The rolling, 12-month summation of the volume of natural gas used.

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

e) Reporting Requirements

(1) 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 appropriate local air agency or District Office and to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, Ohio 43216-3669

(2) Semiannual report(s) shall be submitted no later than 30 days after the end of the 6-month reporting period and shall be accompanied by a certification statement from the permittee, indicating whether compliance with the applicable emission standards and the minimum data requirements of NSPS Subpart Dc were achieved during the reporting period. Semiannual reports may be submitted hard copy to the appropriate DAPC district or local air agency or electronic reports can be submitted to the agency through DAPC's "eBusiness Center, Air Services" website.

(3) The semiannual reports shall containing the following information for each steam generating unit:

a. the beginning and ending dates of the 6-month compliance period;

b. the fuel(s) burned in each subject steam generating unit and the percent of the total operating hours each fuel was combusted in each unit during the 6-month reporting period;

c. a copy of the fuel supplier certification meeting the requirements of 40 CFR 60.48c(f) and a certified statement, signed by the owner or operator of the affected facility, that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period;

d. for steam generating units with a heat input capacity of ≥ 30 MMBtu, identification of each exceedance of the opacity standard in 40 CFR 60.43c(c); excess emissions are defined as all 6-minute periods during which the average opacity exceeds the opacity standards under 40 CFR 60.43c(c);

e. identification of any fuel burned in the steam generating unit(s) where the sulfur content exceeded 0.50% by weight, including the date(s) and amount of any such fuel burned, and justification for burning the fuel;

f. identification of any fuel burned in the steam generating unit(s) where the records did not meet the requirements of 40 CFR 60.48c(f); and/or

(4) The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month No. 2 fuel oil usage limitation and then rolling 12-month natural gas usage limitation. These reports shall be submitted with the annual Permit Evaluation Reports by the due date identified in the Authorization section of this permit.

(5) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(6) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.

f) Testing Requirements

(1) Where compliance with the SO_2 standards of 40 CFR 60.42c are demonstrated based on fuel supplier certification, the performance test shall consist of the certification from the fuel supplier, which shall include the information required by 40 CFR 60.48c(f). Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation(s):

20% opacity, as a six-minute average, except for one 6-minute period per hour of not more than 60% opacity.

Applicable Compliance Method(s):

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A, Method 9.

b. Emission Limitation(s):

Emissions of NOx shall not exceed 1.37 tons per month averaged over a twelve-month rolling period

Applicable Compliance Method(s):

The emission limitation was based upon the emission factor supplied the manufacturer in the application for PTIO P0119355. Compliance with the emissions limitation may be determined by multiplying the 0.13 lb NOx/mmBtu value for fuel oil by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr, dividing by 2000 lbs/ton, and then dividing by 12 months/yr.

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

c. Emission Limitation(s):

Emissions of CO shall not exceed 1.69 tons per month averaged over a twelve-month rolling period.

Applicable Compliance Method(s):

The emission limitation was based upon the emission factor supplied the manufacturer in the application for PTIO P0119355. Compliance with the emission limitation may be determined by multiplying the 0.16 lb CO/mmBtu value for fuel oil by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr, dividing by 2000 lbs/ton, and then dividing by 12 months/yr.

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

d. Emission Limitation(s):

Emissions of VOC shall not exceed 0.04 tons per month averaged over a twelve-month rolling period.

Applicable Compliance Method(s):

The emission limitation was based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-3 (7/98). Compliance with the emission limitation may be demonstrated by multiplying the 0.004 lb TOC/mmBtu value for fuel oil by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr, dividing by 2000 lbs/ton, and dividing by 12 months/yr.

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

e. Emission Limitation(s):

PM emissions shall not exceed 0.20 pound per million Btu of actual heat input while using natural gas and 0.040 pound per million Btu of actual heat input while using No. 2 fuel oil.

Applicable Compliance Method(s):

Compliance with the 0.040 lb/mmBtu No. 2 fuel oil emission limitation may be determined by converting the 2 lbs PE/10^3 gal emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-1 (9/98) into lbs PE/mmBtu by dividing by 138.5 mmBtu/10^3 gal. Compliance with the 0.20 lb/mmBtu natural gas emission limitation may be determined by converting the 7.6 lbs PE/10^6scf emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (9/98) into lbs PE/mmBtu by dividing by 967 Btu/scf.

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

f. Sulfur Content Limitation(s):

$\leq$ 0.052 lb/MMBtu and $\leq$ 0.5 weight percent sulfur for No. 2 fuel oil.

Applicable Compliance Method(s):

Compliance shall be demonstrated by the record keeping requirement described in paragraph d)(1).

g) Miscellaneous Requirements

(1) None.

2. B002, Boiler No. 2

Operations, Property and/or Equipment Description:

International-LaMont Hot Fluid Boiler model #TJW-C-25; E-Tech Heat Recovery Systems Economizer model #BV-180709-04.02 Rated Input Capacity 30.29 mmBtu/hr Natural Gas; 28.88 mmBtu/hrNo. Fuel Oil

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. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Carbon monoxide (CO) emissions shall not exceed 1.69 tons per month averaged over a twelve-month rolling period. Nitrogen oxide (NOx) emissions shall not exceed 1.37 tons per month averaged over a twelve-month rolling period. Volatile organic compound (VOC) emissions shall not exceed 0.04 tons per month averaged over a twelve-month rolling period. The Best Available Technology (BAT) requirements for PM and SO2 are equivalent to the restrictions established under OAC Rule 3745-17-10(B)(1), OAC

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Rule 3745-31-05(E), and 40 CFR Part 60 Subpart Dc. See b)(2)a. below
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to CO and SO2 from this air contaminant source since the calculated annual emission rate is less than 10 tons/yr taking into account the voluntary restriction from OAC rule 3745-31-05(E). BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM, NOx, and VOC emissions from this air contaminant source since the potential to emit is less than 10 tons/year. See b)(2)b. below
c.	AC Rule 3745-17-07(A)(1)	sible emissions from steam generating units with a heat input capacity ≥ 10 MMBtu/hour and < 30 MMBtu/hour shall not exceed 20% opacity as a 6-minute average, except for one consecutive 6-minute period in any 60 minutes, but shall not exceed 60% opacity as a 6-minute average at any time.
d.	AC Rule 3745-17-10(B)(1)	M emissions shall not exceed 0.20 pound per million Btu of actual heat input while using natural gas and 0.040 pound per million Btu of actual heat input while using No. 2 fuel oil.
e.	AC rule 3745-18-06(D)	e SO_2 emissions limit specified by this rule shall is less stringent then the emissions limitation established pursuant to OAC 3745-31-05(E).
f.	AC rule 3745-31-05(E) (to avoid state modeling)	01, B002, and B003 combined shall not use more than 1,000,000 gallons of No. 2 fuel oil per rolling, 12-month period. 01, B002, and B003 combined shall not use more than 300,000 mmft^3 of natural

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		gas per rolling, 12-month period. e fuel utilized in B001, B002, and B003 shall have a sulfur content of less 0.052 lb/mmBtu of actual heat input.
g.	CFR Part 60 Subpart Dc) CFR 60.40c to 60.48c) accordance with 40 CFR 60.40c and 60.41c, this emissions unit is a steam generating unit subject to the Standards of Performance for Small Industrial, Commercial, Institutional Steam Generating Units, constructed after 6/9/89.	e steam generating unit shall be operated and maintained in continuous compliance with the emission standards and applicable requirements of 40 CFR Part 60, Subpart Dc.
h.	CFR 60.42c(d)	e permittee has committed to only burn natural gas or fuel oil that contains no more than 0.50 weight percent sulfur.

(2) Additional Terms and Conditions

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

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

c. The tons per month averaged over a twelve-month rolling period emission limitations are based on the emissions unit's potentials to emit. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with these emission limitations.

d. The SO_2 emission standards apply at all times, including periods of startup, shutdown, and malfunction. The permittee shall demonstrate compliance with the SO_2 standards by burning natural gas or fuel oils with less than or equal to 0.50% weight percent sulfur.

e. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States

Environmental Protection Agency (U.S. EPA), 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency (Ohio EPA).

c) Operational Restrictions

(1) The permittee shall burn only natural gas and/or No. 2 fuel oil in this emissions unit.

(2) The quality of No. 2 fuel oil received for burning in this emissions unit shall have a combination of sulfur content and heat content sufficient to comply with the allowable sulfur limitation of 0.052 lb/mmBtu of actual heat input and the sulfur content limitation for No. 2 fuel oil of less than or equal to 0.5 weight per cent sulfur.

(3) The maximum annual No. 2 fuel oil usage rate for B001, B002, and B003 combined shall not exceed 1,000,000 gallons per rolling, 12-month period.

(4) The maximum annual natural gas usage rate for B001, B002, and B003 combined shall not exceed 300,000 $mmft^3$ per rolling, 12-month period.

d) Monitoring and/or Recordkeeping Requirements

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

a. Alternative 1:

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

b. Alternative 2:

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

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

(2) The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.

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

a. The total volume of natural gas (mmft^3) burned in this emissions unit.

b. The total number of gallons of No. 2 fuel oil used in this boiler for each month.

c. The rolling, 12-month summation of the gallons of No. 2 fuel oil used.

d. The rolling, 12-month summation of the volume of natural gas used.

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

e) Reporting Requirements

(1) 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 appropriate local air agency or District Office and to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, Ohio 43216-3669

(2) Semiannual report(s) shall be submitted no later than 30 days after the end of the 6-month reporting period and shall be accompanied by a certification statement from the permittee, indicating whether compliance with the applicable emission standards and the minimum data requirements of NSPS Subpart Dc were achieved during the reporting period. Semiannual reports may be submitted hard copy to the appropriate DAPC district or local air agency or electronic reports can be submitted to the agency through DAPC's "eBusiness Center, Air Services" website.

(3) The semiannual reports shall containing the following information for each steam generating unit:

a. the beginning and ending dates of the 6-month compliance period;

b. the fuel(s) burned in each subject steam generating unit and the percent of the total operating hours each fuel was combusted in each unit during the 6-month reporting period;

c. a copy of the fuel supplier certification meeting the requirements of 40 CFR 60.48c(f) and a certified statement, signed by the owner or operator of the affected facility, that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period;

d. for steam generating units with a heat input capacity of ≥ 30 MMBtu, identification of each exceedance of the opacity standard in 40 CFR 60.43c(c); excess emissions are defined as all 6-minute periods during which the average opacity exceeds the opacity standards under 40 CFR 60.43c(c);

e. identification of any fuel burned in the steam generating unit(s) where the sulfur content exceeded 0.50% by weight, including the date(s) and amount of any such fuel burned, and justification for burning the fuel;

f. identification of any fuel burned in the steam generating unit(s) where the records did not meet the requirements of 40 CFR 60.48c(f); and/or

(4) The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month No. 2 fuel oil usage limitation and then rolling 12-month natural gas usage limitation. These reports shall be submitted with the annual Permit Evaluation Reports by the due date identified in the Authorization section of this permit.

(5) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(6) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.

f) Testing Requirements

(1) Where compliance with the SO_2 standards of 40 CFR 60.42c are demonstrated based on fuel supplier certification, the performance test shall consist of the certification from the fuel supplier, which shall include the information required by 40 CFR 60.48c(f). Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation(s):

20% opacity, as a six-minute average, except for one 6-minute period per hour of not more than 60% opacity.

Applicable Compliance Method(s):

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A, Method 9.

b. Emission Limitation(s):

Emissions of NOx shall not exceed 1.37 tons per month averaged over a twelve-month rolling period

Applicable Compliance Method(s):

The emission limitation was based upon the emission factor supplied the manufacturer in the application for PTIO P0119355. Compliance with the emissions limitation may be determined by multiplying the 0.13 lb NOx/mmBtu value for fuel oil by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr, dividing by 2000 lbs/ton, and then dividing by 12 months/yr.

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

c. Emission Limitation(s):

Emissions of CO shall not exceed 1.69 tons per month averaged over a twelve-month rolling period.

Applicable Compliance Method(s):

The emission limitation was based upon the emission factor supplied the manufacturer in the application for PTIO P0119355. Compliance with the emission limitation may be determined by multiplying the 0.16 lb CO/mmBtu value for fuel oil by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr, dividing by 2000 lbs/ton, and then dividing by 12 months/yr.

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

d. Emission Limitation(s):

Emissions of VOC shall not exceed 0.04 tons per month averaged over a twelve-month rolling period.

Applicable Compliance Method(s):

The emission limitation was based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-3 (7/98). Compliance with the emission limitation may be demonstrated by multiplying the 0.004 lb TOC/mmBtu value for fuel oil by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr, dividing by 2000 lbs/ton, and dividing by 12 months/yr.

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

e. Emission Limitation(s):

PM emissions shall not exceed 0.20 pound per million Btu of actual heat input while using natural gas and 0.040 pound per million Btu of actual heat input while using No. 2 fuel oil.

Applicable Compliance Method(s):

Compliance with the 0.040 lb/mmBtu No. 2 fuel oil emission limitation may be determined by converting the 2 lbs PE/10^3 gal emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-1 (9/98) into lbs PE/mmBtu by dividing by 138.5 mmBtu/10^3 gal. Compliance with the 0.20 lb/mmBtu natural gas emission limitation may be determined by converting the 7.6 lbs PE/10^6scf emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (9/98) into lbs PE/mmBtu by dividing by 967 Btu/scf.

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

f. Sulfur Content Limitation(s):

$\leq$ 0.052 lb/MMBtu and $\leq$ 0.5 weight percent sulfur for No. 2 fuel oil.

Applicable Compliance Method(s):

Compliance shall be demonstrated by the record keeping requirement described in paragraph d)(1).

g) Miscellaneous Requirements

(1) None.

3. B003, Boiler No. 3

Operations, Property and/or Equipment Description:

International-LaMont Hot Fluid Boiler model #TJW-C-10; E-Tech Heat Recovery Systems Economizer model #BV-100705-03.01 Rated Input Capacity 12.19 mmBtu/hr Natural Gas; 11.62 mmBtu/hrNo. Fuel Oil

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. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Carbon monoxide (CO) emissions shall not exceed 0.68 tons per month averaged over a twelve-month rolling period. Nitrogen oxide (NOx) emissions shall not exceed 0.55 tons per month averaged over a twelve-month rolling period. Volatile organic compound (VOC) emissions shall not exceed 0.02 tons per month averaged over a twelve-month rolling period. The Best Available Technology (BAT) requirements for PM and SO2 are equivalent to the restrictions established under OAC Rule 3745-17-10(B)(1), OAC

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Rule 3745-31-05(E), and 40 CFR Part 60 Subpart Dc. See b)(2)a. below
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to CO and SO2 from this air contaminant source since the calculated annual emission rate is less than 10 tons/yr taking into account the voluntary restriction from OAC rule 3745-31-05(E). BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM, NOx, and VOC emissions from this air contaminant source since the potential to emit is less than 10 tons/year. See b)(2)b. below
c.	OAC Rule 3745-17-07(A)(1)	Visible emissions from steam generating units with a heat input capacity ≥ 10 MMBtu/hour and < 30 MMBtu/hour shall not exceed 20% opacity as a 6-minute average, except for one consecutive 6-minute period in any 60 minutes, but shall not exceed 60% opacity as a 6-minute average at any time.
d.	OAC Rule 3745-17-10(B)(1)	PM emissions shall not exceed 0.20 pound per million Btu of actual heat input while using natural gas and 0.040 pound per million Btu of actual heat input while using No. 2 fuel oil.
e.	OAC rule 3745-18-06(D)	The SO_2 emissions limit specified by this rule shall is less stringent then the emissions limitation established pursuant to OAC 3745-31-05(E).
f.	OAC rule 3745-31-05(E) (to avoid state modeling)	B001, B002, and B003 combined shall not use more than 1,000,000 gallons of No. 2 fuel oil per rolling, 12-month period. B001, B002, and B003 combined shall not use more than 300,000 mmft^3 of natural gas per rolling, 12-month period. The fuel utilized in B001, B002, and B003

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		shall have a sulfur content of less 0.052 lb/mmBtu of actual heat input.
g.	40 CFR Part 60 Subpart Dc (40 CFR 60.40c to 60.48c) In accordance with 40 CFR 60.40c and 60.41c, this emissions unit is a steam generating unit subject to the Standards of Performance for Small Industrial, Commercial, Institutional Steam Generating Units, constructed after 6/9/89.	The steam generating unit shall be operated and maintained in continuous compliance with the emission standards and applicable requirements of 40 CFR Part 60, Subpart Dc.
h.	40 CFR 60.42c(d)	The permittee has committed to only burn natural gas or fuel oil that contains no more than 0.50 weight percent sulfur.

(2) Additional Terms and Conditions

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

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

c. The tons per month averaged over a twelve-month rolling period emission limitations are based on the emissions unit's potentials to emit. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with these emission limitations.

d. The SO_2 emission standards apply at all times, including periods of startup, shutdown, and malfunction. The permittee shall demonstrate compliance with the SO_2 standards by burning natural gas or fuel oils with less than or equal to 0.50% weight percent sulfur.

e. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency (U.S. EPA), 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency (Ohio EPA).

c) Operational Restrictions

(1) The permittee shall burn only natural gas and/or No. 2 fuel oil in this emissions unit.

(2) The quality of No. 2 fuel oil received for burning in this emissions unit shall have a combination of sulfur content and heat content sufficient to comply with the allowable sulfur limitation of 0.052 lb/mmBtu of actual heat input and the sulfur content limitation for No. 2 fuel oil of less than or equal to 0.5 weight per cent sulfur.

(3) The maximum annual No. 2 fuel oil usage rate for B001, B002, and B003 combined shall not exceed 1,000,000 gallons per rolling, 12-month period.

(4) The maximum annual natural gas usage rate for B001, B002, and B003 combined shall not exceed 300,000 $mmft^3$ per rolling, 12-month period.

d) Monitoring and/or Recordkeeping Requirements

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

a. Alternative 1:

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

b. Alternative 2:

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

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

(2) The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.

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

a. The total volume of natural gas (mmft^3) burned in this emissions unit.

b. The total number of gallons of No. 2 fuel oil used in this boiler for each month.

c. The rolling, 12-month summation of the gallons of No. 2 fuel oil used.

d. The rolling, 12-month summation of the volume of natural gas used.

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

e) Reporting Requirements

(1) 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 appropriate local air agency or District Office and to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, Ohio 43216-3669

(2) Semiannual report(s) shall be submitted no later than 30 days after the end of the 6-month reporting period and shall be accompanied by a certification statement from the permittee, indicating whether compliance with the applicable emission standards and the minimum data requirements of NSPS Subpart Dc were achieved during the reporting period. Semiannual reports may be submitted hard copy to the appropriate DAPC district or local air agency or electronic reports can be submitted to the agency through DAPC's "eBusiness Center, Air Services" website.

(3) The semiannual reports shall containing the following information for each steam generating unit:

a. the beginning and ending dates of the 6-month compliance period;

b. the fuel(s) burned in each subject steam generating unit and the percent of the total operating hours each fuel was combusted in each unit during the 6-month reporting period;

c. a copy of the fuel supplier certification meeting the requirements of 40 CFR 60.48c(f) and a certified statement, signed by the owner or operator of the affected facility, that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period;

d. for steam generating units with a heat input capacity of ≥ 30 MMBtu, identification of each exceedance of the opacity standard in 40 CFR 60.43c(c); excess emissions are defined as all 6-minute periods during which the average opacity exceeds the opacity standards under 40 CFR 60.43c(c);

e. identification of any fuel burned in the steam generating unit(s) where the sulfur content exceeded 0.50% by weight, including the date(s) and amount of any such fuel burned, and justification for burning the fuel;

f. identification of any fuel burned in the steam generating unit(s) where the records did not meet the requirements of 40 CFR 60.48c(f); and/or

(4) The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month No. 2 fuel oil usage limitation and then rolling 12-month natural gas usage limitation. These reports shall be submitted with the annual Permit Evaluation Reports by the due date identified in the Authorization section of this permit.

(5) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(6) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency 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.

f) Testing Requirements

(1) Where compliance with the SO_2 standards of 40 CFR 60.42c are demonstrated based on fuel supplier certification, the performance test shall consist of the certification from the fuel supplier, which shall include the information required by 40 CFR 60.48c(f). Compliance with the emission limitations in b)(1) shall be determined in accordance with the following methods:

a. Emission Limitation(s):

20% opacity, as a six-minute average, except for one 6-minute period per hour of not more than 60% opacity.

Applicable Compliance Method(s):

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A, Method 9.

b. Emission Limitation(s):

Emissions of NOx shall not exceed 0.55 tons per month averaged over a twelve-month rolling period

Applicable Compliance Method(s):

The emission limitation was based upon the emission factor supplied the manufacturer in the application for PTIO P0119355. Compliance with the emissions limitation may be determined by multiplying the 0.13 lb NOx/mmBtu value for fuel oil by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr, dividing by 2000 lbs/ton, and then dividing by 12 months/yr.

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

c. Emission Limitation(s):

Emissions of CO shall not exceed 0.68 tons per month averaged over a twelve-month rolling period.

Applicable Compliance Method(s):

The emission limitation was based upon the emission factor supplied the manufacturer in the application for PTIO P0119355. Compliance with the emission limitation may be determined by multiplying the 0.16 lb CO/mmBtu value for fuel oil by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr, dividing by 2000 lbs/ton, and then dividing by 12 months/yr.

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

d. Emission Limitation(s):

Emissions of VOC shall not exceed 0.02 tons per month averaged over a twelve-month rolling period.

Applicable Compliance Method(s):

The emission limitation was based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-3 (7/98). Compliance with the emission limitation may be demonstrated by multiplying the 0.004 lb TOC/mmBtu value for fuel oil by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr, dividing by 2000 lbs/ton, and dividing by 12 months/yr.

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

e. Emission Limitation(s):

PM emissions shall not exceed 0.20 pound per million Btu of actual heat input while using natural gas and 0.040 pound per million Btu of actual heat input while using No. 2 fuel oil.

Applicable Compliance Method(s):

Compliance with the 0.040 lb/mmBtu No. 2 fuel oil emission limitation may be determined by converting the 2 lbs PE/10^3 gal emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-1 (9/98) into lbs PE/mmBtu by dividing by 138.5 mmBtu/10^3 gal. Compliance with the 0.20 lb/mmBtu natural gas emission limitation may be determined by converting the 7.6 lbs PE/10^6scf emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (9/98) into lbs PE/mmBtu by dividing by 967 Btu/scf.

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

f. Sulfur Content Limitation(s):

$\leq$ 0.052 lb/MMBtu and $\leq$ 0.5 weight percent sulfur for No. 2 fuel oil.

Applicable Compliance Method(s):

Compliance shall be demonstrated by the record keeping requirement described in paragraph d)(1).

g) Miscellaneous Requirements

(1) None.