



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

5/4/2016

Certified Mail

Mr. Ray Braun  
University Hospital Health System dba Ahuja Medical Cen  
3999 Richmond Rd.  
Beachwood, OH 44122

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

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1318028709  
Permit Number: P0119344  
Permit Type: Renewal  
County: Cuyahoga

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](http://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](http://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](http://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 Cleveland Division of Air Quality at (216)664-2297 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: CDAQ



## Response to Comments

Facility ID:	1318028709
Facility Name:	University Hospital Health System dba Ahuja Medical Cen
Facility Description:	
Facility Address:	3999 Richmond Rd. Beachwood, OH 44122 Cuyahoga County
Permit:	P0119344, Permit-To-Install and Operate - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Plain Dealer on 03/03/2016. The comment period ended on 04/02/2016.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

**1. Topic: Fuel oil limitation**

**a. Comment:**

Ahuja would like to remove the fuel oil limitation of 500 hours per rolling 12-months and replace it with the 48 hours per year for periodic testing limitation, and adjust the annual emission rates for fuel oil burning accordingly.

**b. Response:**

Ohio EPA/CDAQ has adjusted the fuel oil usage limit to 48 hours per year, based on a rolling 12-month summation. This limitation is needed in order to avoid the area source boiler MACT requirements of 40 CFR Part 63 Subpart JJJJJJ.

In section b)(1) of the emissions unit terms, the following changes were made:

- NOx emissions were revised not to exceed 0.006 ton per month averaged over a twelve-month rolling period when burning fuel oil. NOx emissions were revised not to exceed 0.08 TPY when burning fuel oil.



- SO<sub>2</sub> emissions not to exceed 0.01 ton per month averaged over a twelve-month period when burning fuel oil. SO<sub>2</sub> emissions shall not exceed 0.15 ton per rolling 12-month period when burning fuel oil.
- The NSPS Subpart Dc SO<sub>2</sub> emission limitation was added back into the permit as it was in the original FEPTIO permit P0106451 issued in 2010. The Subpart Dc limit is 0.5 lb SO<sub>2</sub> per mmBtu when burning No. 2 fuel oil or the sulfur content of the oil shall not exceed 0.5 weight percent sulfur.

In term c)(3), the restriction has been changed from 500 hours per year to 48 hours per year.

Term e)(2) has been deleted since the facility has already submitted the initial notification for the NSPS Subpart Dc.

Term e)(3) has been changed to identify submittal of the requested information with the annual Permit Evaluation Report instead of within 45 days since this is not a rule-based reporting requirement.

In f)(1), the emission limits have been adjusted as noted above. Also, we have deleted each reference to stack testing since the permit no longer contains hourly emission limits.

Term f)(1)m. has been deleted since the restriction on hours of operation is not an emissions limit or control requirement specified in section b) of the emissions unit terms.



**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for**

**University Hospital Health System dba Ahuja Medical Cen**

Facility ID:	1318028709
Permit Number:	P0119344
Permit Type:	Renewal
Issued:	5/4/2016
Effective:	5/4/2016
Expiration:	5/4/2021





**Division of Air Pollution Control**  
**Permit-to-Install and Operate**  
for  
University Hospital Health System dba Ahuja Medical Cen

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## Authorization

Facility ID: 1318028709  
Application Number(s): A0053840  
Permit Number: P0119344  
Permit Description: FEPTIO renewal permit for emissions units B003, B004, B005, and B006 which are 12.55 mmBtu/hr natural gas-fired boilers each with No. 2 fuel oil as a backup fuel for no more than 48 hours per rolling 12-month period for each boiler.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 5/4/2016  
Effective Date: 5/4/2016  
Expiration Date: 5/4/2021  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

University Hospital Health System dba Ahuja Medical Cen  
3999 Richmond Rd.  
Beachwood, OH 44122

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:

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

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: P0119344

Permit Description: FEPTIO renewal permit for emissions units B003, B004, B005, and B006 which are 12.55 mmBtu/hr natural gas-fired boilers each with No. 2 fuel oil as a backup fuel for no more than 48 hours per rolling 12-month period for each boiler.

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

**Group Name: Boilers**

<b>Emissions Unit ID:</b>	<b>B003</b>
Company Equipment ID:	Boiler 1
Superseded Permit Number:	P0106451
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B004</b>
Company Equipment ID:	Boiler 2
Superseded Permit Number:	P0106451
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B005</b>
Company Equipment ID:	Boiler 3
Superseded Permit Number:	P0106451
General Permit Category andType:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B006</b>
Company Equipment ID:	Boiler 4
Superseded Permit Number:	P0106451
General Permit Category andType:	Not Applicable



**Final Permit-to-Install and Operate**  
University Hospital Health System dba Ahuja Medical Cen  
**Permit Number:** P0119344  
**Facility ID:** 1318028709  
**Effective Date:** 5/4/2016

## **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 being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

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

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



change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

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

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

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

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



**Final Permit-to-Install and Operate**  
University Hospital Health System dba Ahuja Medical Cen  
**Permit Number:** P0119344  
**Facility ID:** 1318028709  
**Effective Date:** 5/4/2016

## **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



**Final Permit-to-Install and Operate**  
University Hospital Health System dba Ahuja Medical Cen  
**Permit Number:** P0119344  
**Facility ID:** 1318028709  
**Effective Date:** 5/4/2016

## **C. Emissions Unit Terms and Conditions**



**1. Emissions Unit Group -Boilers: B003, B004, B005, and B006.**

EU ID	Operations, Property and/or Equipment Description
B003	Cleaver-Brooks 12.6 mmBtu/hr natural gas-fired boiler using No. 2 fuel oil as a back-up fuel.
B004	Cleaver-Brooks 12.6 mmBtu/hr natural gas-fired boiler using No. 2 fuel oil as a back-up fuel.
B005	Cleaver-Brooks 12.6 mmBtu/hr natural gas-fired boiler using No. 2 fuel oil as a back-up fuel.
B006	Cleaver-Brooks 12.6 mmBtu/hr natural gas-fired boiler using No. 2 fuel oil as a back-up fuel.

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. b)(1)a., b)(1)b., b)(2)a., b)(2)b., f)(1)a. – f)(1)g.

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

a. b)(1)c.

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.	<p><b><i>For each emissions unit, when burning natural gas:</i></b></p> <p>Particulate emissions (PE) shall not exceed 0.048 ton per month averaged over a twelve-month rolling period.</p> <p>Volatile organic compound (VOC) emissions shall not exceed 0.073 ton per month averaged over a twelve-month rolling period.</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed 0.55 ton per month averaged over a twelve-month rolling period.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.69 ton per month averaged over a twelve-month rolling period.</p> <p><b>For each emissions unit, when burning No. 2 fuel oil:</b></p> <p>NO<sub>x</sub> emissions shall not exceed 0.006 ton per month averaged over a twelve-month rolling period.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed 0.01 ton per month averaged over a twelve-month rolling period.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).</p> <p>See b)(2)b. below.</p>
b.	<p>OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008.</p>	<p>The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, VOC, NO<sub>x</sub>, CO, or SO<sub>2</sub> emissions from each air contaminant source since the uncontrolled potential to emit for PE, VOC, and CO emissions, and the calculated annual emission rate for NO<sub>x</sub> and SO<sub>2</sub> is less than 10 TPY, taking into account the federally enforceable restriction in c)(3). below.</p> <p>See b)(2)c. below.</p>
c.	<p>OAC rule 3745-31-05(D) Synthetic minor to avoid Title V</p>	<p><b>For each emissions unit, when burning No. 2 fuel oil:</b></p> <p>SO<sub>2</sub> emissions shall not exceed 0.15 ton per rolling 12-month period.</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(F)	<p><b>For each emissions unit, when burning natural gas:</b></p> <p>PE shall not exceed 0.57 TPY.</p> <p>VOC emissions shall not exceed 0.88 TPY.</p> <p>NO<sub>x</sub> emissions shall not exceed 6.61 TPY.</p> <p>CO emissions shall not exceed 8.28 TPY.</p> <p><b>For each emissions unit, when burning No. 2 fuel oil:</b></p> <p>NO<sub>x</sub> emissions shall not exceed 0.08 TPY.</p>
e.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
f.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 lb per mmBtu for each emission unit.
g.	OAC rule 3745-18-06(D)	When burning No. 2 fuel oil, the emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to 40 CFR Part 60, Subpart Dc.
h.	40 CFR Part 60, Subpart Dc	<p>0.5 lb of SO<sub>2</sub> emissions per mmBtu when burning No. 2 fuel oil; or the sulfur content of the oil shall not exceed 0.5 weight percent sulfur.</p> <p>See b)(2)d. below.</p>

(2) Additional Terms and Conditions

- a. 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).



- b. These BAT emission limits apply until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 TPY BAT exemption) into the Ohio State Implementation Plan (SIP).
  - c. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 TPY BAT exemption) as part of the Ohio SIP.
  - d. The PE limits from 40 CFR Part 60, Subpart Dc are not applicable to these emissions units because the heat input capacity of each is not greater than 30 mmBtu/hour.
  - e. Provided that this emissions unit meets the definition of a “gas fired boiler”, as defined in 40 CFR Part 63.11237, this emissions unit is not subject to the requirements of 40 CFR Part 63 Subpart JJJJJJ if fuel oil is only burned during periods of gas curtailment, gas supply emergencies, or periodic testing. Periodic testing of the fuel oil shall not exceed 48 hours during any calendar year.
- c) Operational Restrictions
- (1) The permittee shall burn only natural gas and/or No. 2 fuel oil in each emissions unit.
  - (2) The quality of No. 2 fuel oil received for burning in each emissions unit shall have a combination of sulfur content and heat content sufficient to comply with the allowable SO<sub>2</sub> emission limitation of 0.50 lb/mmBtu of actual heat input, or a sulfur content for No. 2 fuel oil of less than or equal to 0.5 weight per cent sulfur.
  - (3) The maximum annual operating hours for each emissions unit while burning No. 2 fuel oil shall not exceed 48 hours per year, based on a rolling, 12-month summation of the operating hours.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain records of the oil burned in each 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 each emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil consistent with the requirements in 40 CFR §60.48c(f) and maintain records of the total quantity of oil received, the permittee’s or oil supplier’s analysis for sulfur content and heat content, and the calculated SO<sub>2</sub> emission rate (in lb/mmBtu) [The SO<sub>2</sub> 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 each emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving each 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 each emissions unit. A representative grab sample of oil does not need to be collected on days when each 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 SO<sub>2</sub> emission rate (in lb/mmBtu) [The SO<sub>2</sub> 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 American Society for Testing and Materials (ASTM) methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the director.

(2) The permittee shall maintain monthly records for the following information:

- a. the total hours of operation of each emissions unit while burning No. 2 fuel oil for each month; and
- b. the rolling 12-month summation of the operating hours of each emissions unit while burning No. 2 fuel oil.

e) Reporting Requirements

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

- (2) The permittee shall include in the annual PER the following:
- a. the date and duration during which any fuel other than natural gas or No. 2 fuel oil was burned in each emissions unit; and
  - b. any record which shows a deviation of the allowable SO<sub>2</sub> emission limitation (lb SO<sub>2</sub>/mmBtu) and/or sulfur content limitation based upon the record keeping requirements from d)(1) above.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify, for each emissions unit:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements of this permit:
    - i. the rolling 12-month limitation on the hours of operation while burning No. 2 fuel oil;
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

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

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

- (4) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.
- 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:  
0.048 ton PE per month averaged over a twelve-month rolling period **whenburning natural gas** in each emissions unit.



Applicable Compliance Method:

Compliance may be determined through the following equation:

$$0.01 \text{ lb PE/mmBtu (emission factor taken from manufacturer Clever-Brooks)} \times 12.6 \text{ mmBtu/hr (boiler rating)} \times 8760 \text{ hours/year (maximum hours of operation)} \times 1 \text{ ton/2000 lbs} \times 1 \text{ year/12 months.}$$

b. Emission Limitation:

0.073 ton VOC per month averaged over a twelve-month rolling period **whenburning natural gas** in each emissions unit.

Applicable Compliance Method:

Compliance may be determined through the following equation:

$$0.016 \text{ lb VOC/mmBtu (emission factor taken from manufacturer Clever-Brooks)} \times 12.6 \text{ mmBtu/hr (boiler rating)} \times 8760 \text{ hours/year (maximum hours of operation)} \times 1 \text{ ton/2000 lbs} \times 1 \text{ year/12 months.}$$

c. Emission Limitation:

0.55 ton NO<sub>x</sub> per month averaged over a twelve-month rolling period **whenburning natural gas** in each emissions unit.

Applicable Compliance Method:

Compliance may be determined through the following equation:

$$0.12 \text{ lb NO}_x\text{/mmBtu (emission factor taken from manufacturer Clever-Brooks)} \times 12.6 \text{ mmBtu/hr (boiler rating)} \times 8760 \text{ hours/year (maximum hours of operation)} \times 1 \text{ ton/2000 lbs} \times 1 \text{ year/12 months.}$$

d. Emission Limitation:

0.69 ton CO per month averaged over a twelve-month rolling period **whenburning natural gas** in each emissions unit.

Applicable Compliance Method:

Compliance may be determined through the following equation:

$$0.15 \text{ lb CO/mmBtu (emission factor taken from manufacturer Clever-Brooks)} \times 12.6 \text{ mmBtu/hr (boiler rating)} \times 8760 \text{ hours/year (maximum hours of operation)} \times 1 \text{ ton/2000 lbs} \times 1 \text{ year/12 months.}$$

e. Emission Limitation:

0.006 ton NO<sub>x</sub> per month averaged over a twelve-month rolling period **whenburning No. 2 fuel oil** in each emissions unit.



Applicable Compliance Method:

Compliance may be determined through the following equation:

$0.25 \text{ lb NO}_x/\text{mmBtu}$  (emission factor taken from manufacturer Clever-Brooks)  $\times$   
 $12.6 \text{ mmBtu/hr}$  (boiler rating)  $\times$  48 hours/year (maximum hours of operation)  $\times$  1  
ton/2000 lbs  $\times$  1 year/12 months.

f. Emission Limitation:

0.01 ton SO<sub>2</sub> per month averaged over a twelve-month rolling period **when burning No. 2 fuel oil** in each emissions unit.

Applicable Compliance Method:

Compliance may be determined through the following equation:

$0.50 \text{ lb SO}_2/\text{mmBtu}$  (emission factor taken from manufacturer Clever-Brooks)  $\times$   
 $12.6 \text{ mmBtu/hr}$  (boiler rating)  $\times$  48 hours/year (maximum hours of operation)  $\times$  1  
ton/2000 lbs  $\times$  1 year/12 months.

g. Emission Limitation:

0.15 ton SO<sub>2</sub> per rolling 12-month period **when burning No. 2 fuel oil** in each emissions unit.

Applicable Compliance Method:

Compliance may be determined through the following equation:

h.  $0.50 \text{ lb SO}_2/\text{mmBtu}$  (emission factor taken from manufacturer Clever-Brooks)  $\times$   
 $12.6 \text{ mmBtu/hr}$  (boiler rating)  $\times$  48 hours/year (maximum allowable hours of  
operation)  $\times$  1 ton/2000 lbs Emission Limitation:

0.57 TPY of PE **when burning natural gas** in each emissions unit.

Applicable Compliance Method:

Compliance may be determined through the following equation:

$0.01 \text{ lb PE/mmBtu}$  (emission factor taken from manufacturer Clever-Brooks)  $\times$   
 $12.6 \text{ mmBtu/hr}$  (boiler rating)  $\times$  8760 hours/year (maximum hours of operation)  $\times$   
1 ton/2000 lbs

i. Emission Limitation:

0.88 TPY of VOC **when burning natural gas** in each emissions unit.

Applicable Compliance Method:

Compliance may be determined through the following equation:



$0.016 \text{ lb VOC/mmBtu (emission factor taken from manufacturer Clever-Brooks)} \times 12.6 \text{ mmBtu/hr (boiler rating)} \times 8760 \text{ hours/year (maximum hours of operation)} \times 1 \text{ ton/2000 lbs}$

j. Emission Limitation:

6.61 TPY of NO<sub>x</sub> **when burning natural gas** in each emissions unit.

Applicable Compliance Method:

Compliance may be determined through the following equation:

$0.12 \text{ lb NO}_x/\text{mmBtu (emission factor taken from manufacturer Clever-Brooks)} \times 12.6 \text{ mmBtu/hr (boiler rating)} \times 8760 \text{ hours/year (maximum hours of operation)} \times 1 \text{ ton/2000 lbs}$

k. Emission Limitation:

8.28 TPY of CO **when burning natural gas** in each emissions unit.

Applicable Compliance Method:

Compliance may be determined through the following equation:

$0.15 \text{ lb CO/mmBtu (emission factor taken from manufacturer Clever-Brooks)} \times 12.6 \text{ mmBtu/hr (boiler rating)} \times 8760 \text{ hours/year (maximum hours of operation)} \times 1 \text{ ton/2000 lbs}$

l. Emission Limitation:

0.08 TPY of NO<sub>x</sub> for each emissions unit **when burning No. 2 fuel oil.**

Applicable Compliance Method:

Compliance may be determined through the following equation:

$0.25 \text{ lb NO}_x/\text{mmBtu (emission factor taken from manufacturer Clever-Brooks)} \times 12.6 \text{ mmBtu/hr (boiler rating)} \times 48 \text{ hours/year (maximum hours of operation)} \times 1 \text{ ton/2000 lbs}$

m. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

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.



n. Emission Limitation:

PE shall not exceed 0.020 lb per mmBtu for each emissions unit.

Applicable Compliance Method:

Compliance may be demonstrated through the use of manufacturer's specification sheets.

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.

o. Emission Limitation:

0.5 lb of SO<sub>2</sub> emissions per mmBtu when burning No. 2 fuel oil; or the sulfur content of the oil shall not exceed 0.5 weight percent sulfur.

Applicable Compliance Method:

Compliance shall be determined in accordance with the record keeping in d)(1).

g) Miscellaneous Requirements

- (1) The emissions units were installed on 9/18/2010. Initial FEPTIO permit P0106451 was issued on 9/15/2010.