



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

5/5/2016

Certified Mail

Bill Haas
Youngstown State University
One University Plaza
Youngstown, OH 44555

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	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: 0250110125
Permit Number: P0120276
Permit Type: Initial Installation
County: Mahoning

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, Northeast District Office at (330)963-1200 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-NEDO



Response to Comments

Facility ID:	0250110125
Facility Name:	Youngstown State University
Facility Description:	University Campus
Facility Address:	603 WICK AVE Youngstown, OH 44503 Mahoning County
Permit:	P0120276, Permit-To-Install and Operate - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Youngstown-Vindicator on 04/01/2016. The comment period ended on 05/01/2016.	
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: None

- a. Comment: None
- b. Response: None



FINAL

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

Facility ID:	0250110125
Permit Number:	P0120276
Permit Type:	Initial Installation
Issued:	5/5/2016
Effective:	5/5/2016
Expiration:	5/5/2021



Division of Air Pollution Control
Permit-to-Install and Operate
for
Youngstown State University

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Final Permit-to-Install and Operate
Youngstown State University
Permit Number: P0120276
Facility ID: 0250110125
Effective Date: 5/5/2016

Authorization

Facility ID: 0250110125
Application Number(s): A0055286
Permit Number: P0120276
Permit Description: Initial installation permit for three identical boilers (B006, B007, and B008) rated at 47.9 mmBtu/hr capable of firing both natural gas and No. 2 fuel oil with synthetic minor limitations to avoid State modeling and Title V permitting.
Permit Type: Initial Installation
Permit Fee: \$600.00
Issue Date: 5/5/2016
Effective Date: 5/5/2016
Expiration Date: 5/5/2021
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Youngstown State University
603 WICK AVE
Youngstown, OH 44503

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

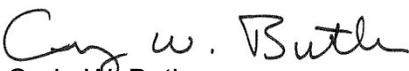
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)963-1200

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: P0120276

Permit Description: Initial installation permit for three identical boilers (B006, B007, and B008) rated at 47.9 mmBtu/hr capable of firing both natural gas and No. 2 fuel oil with synthetic minor limitations to avoid State modeling and Title V permitting.

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

Group Name: Boilers

Emissions Unit ID:	B006
Company Equipment ID:	Boiler #1
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	B007
Company Equipment ID:	Boiler #2
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	B008
Company Equipment ID:	Boiler #3
Superseded Permit Number:	
General Permit Category andType:	Not Applicable



Final Permit-to-Install and Operate
Youngstown State University
Permit Number: P0120276
Facility ID: 0250110125
Effective Date: 5/5/2016

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
Youngstown State University
Permit Number: P0120276
Facility ID: 0250110125
Effective Date: 5/5/2016

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) B.2
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 Ohio EPA Northeast District Office.



Final Permit-to-Install and Operate
Youngstown State University
Permit Number: P0120276
Facility ID: 0250110125
Effective Date: 5/5/2016

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -Boilers: B006, B007, and B008

EU ID	Operations, Property and/or Equipment Description
B006	Cleaver-Brooks boiler #1 rated at 47.9 mmBtu/hr when burning Natural Gas; 46 mmBtu/hr when burning No. 2 Fuel Oil.
B007	Cleaver-Brooks boiler #2 rated at 47.9 mmBtu/hr when burning Natural Gas; 46 mmBtu/hr when burning No. 2 Fuel Oil.
B008	Cleaver-Brooks boiler #3 rated at 47.9 mmBtu/hr when burning Natural Gas; 46 mmBtu/hr when burning No. 2 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. b)(1)d and f)(1)c

(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 and f)(1)b

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	For each emissions unit, install a burner designed to meet the following: When burning natural gas: 0.035 lb nitrogen oxides (NO _x) per mmBtu of heat input; 0.0187 lb carbon monoxide (CO) per mmBtu of heat input; 0.0036 lb volatile organic compounds (VOC) per mmBtu of heat input; 0.0019 lb particulate matter (PM) per mmBtu of heat input; and

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>0.0006 lbsulfur dioxide (SO₂) per mmBtu of heat input.</p> <p>When burning No. 2 fuel oil: 0.115 lb NO_x per mmBtu of heat input; 0.008 lb CO per mmBtu of heat input; 0.0014 lb VOC per mmBtu of heat input; 0.0143 lb PM per mmBtu of heat input; and 0.479 lb SO₂ per mmBtu of heat input.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	<p>The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO, VOC, PE, or SO₂ emissions from this air contaminant source since the potential to emit is less than 10 tons per year (TPY).</p> <p>See b)(2)b.</p>
c.	OAC rule 3745-31-05(D) Synthetic Minor to avoid TV and PSD.	<p>When burning No. 2 fuel oil, SO₂ emissions shall not exceed 0.28 ton per month, averaged over a 12-month rolling period from B006, B007 and B008, combined.</p> <p>See c)(2).</p>
d.	OAC rule 3745-31-05(E) State-only Enforceable Limitations to avoid modeling.	<p>When burning natural gas in B006, B007 and B008, combined: NO_x emissions shall not exceed 1.3 tons per month, averaged over a 12-month rolling period; CO emissions shall not exceed 0.71 ton per month, averaged over a 12-month rolling period; VOC emissions shall not exceed 0.14 ton per month, averaged over a 12-month rolling period; Particulate emissions (PE) shall not exceed 0.072 ton per month, averaged over a 12-month rolling period; and SO₂ emissions shall not exceed 0.023 ton</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>per month, averaged over a 12-month rolling period.</p> <p>See c)(3).</p> <p>When burning No. 2 fuel oil in B006, B007 and B008, combined: NO_x emissions shall not exceed 0.67 ton per month, averaged over a 12-month rolling period; CO emissions shall not exceed 0.046 ton per month, averaged over a 12-month rolling period; VOC emissions shall not exceed 0.0081 ton per month, averaged over a 12-month rolling period; and PE shall not exceed 0.083 ton per month, averaged over a 12-month rolling period.</p> <p>See c)(4).</p>
e.	OAC rule 3745-17-07(A)(1)	The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to 40 CFR Part 60, Subpart Dc.
f.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 lb per mmBtu of heat input for each emissions 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>When burning No. 2 fuel oil: The restriction on the sulfur content of the fuel oil received for burning in each emissions unit is less stringent than the restriction on the sulfur content of the fuel oil established pursuant to OAC rule 3745-31-05(D).</p> <p>Visible PE from the stack serving each emissions unit shall not exceed 20% opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.</p> <p>See b)(2)c.</p>



(2) Additional Terms and Conditions

- a. This 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 TPY 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 TPY BAT exemption) as part of the Ohio SIP.
- c. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by U.S. EPA, 40 CFR Part 60, are delegated to Ohio EPA.

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 shall have a sulfur content limitation of no greater than 500 parts per million (ppm).
- (3) The maximum amount of natural gas burned in B006, B007 and B008, combined, shall not exceed 880,000 mcf, based upon a rolling, 12-month summation of natural gas burned.

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

Month(s)	Maximum Allowable Cumulative Amount of Natural Gas Burned (in mcf)
1	73,700
1-2	147,000
1-3	220,300
1-4	293,600
1-5	366,900
1-6	440,200
1-7	513,500
1-8	586,800
1-9	660,100
1-10	733,400
1-11	806,700
1-12	880,000

After the first 12 calendar months of operation, compliance with the natural gas usage limitation shall be based upon a rolling, 12-month summation of the natural gas burned.

- (4) The maximum amount of No. 2 fuel oil burned in B006, B007 and B008, combined, shall not exceed 1,000,000 gallons, based upon a rolling, 12-month summation of No. 2 fuel oil burned.

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

Month(s)	Maximum Allowable Cumulative Amount of No. 2 Fuel Oil Burned (in gallons)
1	83,700
1-2	167,000
1-3	250,300
1-4	333,600
1-5	416,900
1-6	500,200
1-7	583,500
1-8	666,800
1-9	750,100
1-10	833,400
1-11	916,700
1-12	1,000,000

After the first 12 calendar months of operation, compliance with the No. 2 fuel oil usage limitation shall be based upon a rolling, 12-month summation of the No. 2 fuel oil burned.

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 §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 SO₂ emission rate (in lb/mmBtu) [The SO₂ 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 SO₂ emission rate (in lb/mmBtu) [The SO₂ 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 of the following information:
- a. the amount, in mcf, of natural gas burned in B006, B007 and B008, combined;
 - b. for the first 12 calendar months of operation, the summation of natural gas burned in B006, B007 and B008, combined, starting from the month operations began;
 - c. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of natural gas burned in B006, B007 and B008, combined;
 - d. the amount, in gallons, of No. 2 fuel oil burned in B006, B007 and B008, combined;
 - e. for the first 12 calendar months of operation, the summation of No. 2 fuel oil burned in B006, B007 and B008, combined, starting from the month operations began; and
 - f. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of No. 2 fuel oil burned in B006, B007 and B008, combined.
- (3) The following records shall be maintained in order to document the fuel supplier certifications and to demonstrate compliance with the SO₂ and PM emission standards in 40 CFR Part 60, Subpart Dc. The fuel supplier certifications shall include the following information for the No. 2 fuel oil:
- a. the name of the oil supplier;
 - b. a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c; and
 - c. the sulfur content or maximum sulfur content of the oil.
- (4) All records required under 40 CFR Part 60, Subpart Dc shall be maintained by the permittee for a period of 2 years following the date of such record.

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 submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA Northeast District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be “submitted” on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit notification(s) of:
 - a. any fuel burned in each emissions unit other than natural gas or No. 2 fuel oil;
 - b. any deviation of the allowable sulfur content limitation, based on burning No. 2 fuel oil that was not certified by the supplier to have a sulfur content of 500 ppm or less.
 - c. any modifications made to an emissions unit that causes it to no longer meet the description of the unit, fuel, or the fuel usage identified in the initial notification submitted in accordance with 40 CFR 60.7. The notification of the change(s) shall be made in the next compliance report following the modification to the unit, to include any change in the fuels to be combusted in each emissions unit subject to 40 CFR Part 60, Subpart Dc or the method of compliance.

The notifications shall include a copy of such record and shall be submitted to the Ohio EPA Northeast District Office within 45 days after the deviation occurs.

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operations restrictions, and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping, and/or testing requirements in this permit:
 - i. the rolling, 12-month limitation on natural gas burned in B006, B007 and B008, combined; and for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative amount of natural gas burned; and
 - ii. the rolling, 12-month limitation on No. 2 fuel oil burned in B006, B007 and B008, combined; and for the first 12 calendar months of operation, all

exceedances of the maximum allowable cumulative amount of No. 2 fuel oil burned.

- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviation (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 Ohio EPA Northeast District Office.

- (4) The permittee shall submit semiannual reports 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 40 CFR Part 60, Subpart Dc were achieved during the reporting period.

The semiannual reports shall contain the following information for each emissions unit:

- a. the beginning and ending dates of the 6-month compliance period;
- b. the fuel(s) burned in each emissions 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 permittee, that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period;
- d. 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 emissions units 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 emissions units where the records did not meet the requirements of 40 CFR 60.48c(f); and/or
- g. identification of any fuel burned that was not documented to be 0.50% sulfur through certification from the supplier.



- (5) 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 12 months for each air contaminant source identified in this permit.
- (6) Pursuant to 40 CFR Part 60, Subpart Dc, the permittee is required to report the following information at the appropriate times:
 - a. date actual construction commenced (no later than 30 days after such date); and
 - b. actual start-up date (within 15 days after such date).

Reports shall be submitted to Ohio EPA Northeast District Office and to:

Ohio EPA
DAPC – Permit Management Unit
P.O. Box 163669
Columbus, Ohio 43216-3669

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(s):

For each emissions unit, install a burner designed to meet the following:

When burning natural gas:

 - i. 0.035 lbNO_x per mmBtu of heat input;
 - ii. 0.0187 lb CO per mmBtu of heat input;
 - iii. 0.0036 lb VOC per mmBtu of heat input;
 - iv. 0.0019 lb filterable PM per mmBtu of heat input; and
 - v. 0.0006 lb SO₂ per mmBtu of heat input.

When burning No. 2 fuel oil:

 - vi. 0.115 lb NO_x per mmBtu of heat input;
 - vii. 0.008 lb CO per mmBtu of heat input;
 - viii. 0.0014 lb VOC per mmBtu of heat input;
 - ix. 0.0143 lb filterable PM per mmBtu of heat input; and
 - x. 0.479 lb SO₂ per mmBtu of heat input.



Applicable Compliance Method:

Based on Cleaver Brooks' design specifications for the CBEX Elite boiler.

b. Emission Limitation:

When burning No. 2 fuel oil, SO₂ emissions shall not exceed 0.28 ton per month, averaged over a 12-month rolling period from B006, B007 and B008, combined.

Applicable Compliance Method:

Compliance may be demonstrated through the record keeping requirements specified in d)(2)d through d)(2)f and the following equation:

Amount of No. 2 fuel oil burned per rolling, 12-month period, in gallons x 138,500 Btu/gal No. 2 fuel oil (heat capacity of No. 2 fuel oil) x 1 mmBtu / 1,000,000 Btu x 0.0479 lb SO₂/mmBtu [0.479 lb SO₂/mmBtu (emission factor taken from manufacturer Cleaver-Brooks derived from oil burned with a sulfur content of 5000 ppm) x (500 ppm {sulfur content voluntary restriction} / 5000 ppm)] x 1 ton / 2000 lbs x 1 year / 12 months

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

c. Emission Limitation(s):

When burning natural gas in B006, B007 and B008, combined, the following emission limitations shall apply:

- i. NO_x emissions shall not exceed 1.3 tons per month, averaged over a 12-month rolling period;
- ii. CO emissions shall not exceed 0.71 ton per month, averaged over a 12-month rolling period;
- iii. VOC emissions shall not exceed 0.14 ton per month, averaged over a 12-month rolling period;
- iv. PE shall not exceed 0.072 ton per month, averaged over a 12-month rolling period; and
- v. SO₂ emissions shall not exceed 0.023 ton per month, averaged over a 12-month rolling period.

Applicable Compliance Method:

Compliance may be demonstrated through the record keeping requirements specified in d)(2)a through d)(2)c and the following equation:



Amount of natural gas burned per rolling, 12-month period, in mcf x 1000 ft³/mcf x 1,028 Btu/ft³ (conversion factor) x 1 mmBtu / 1,000,000 Btu x lb/mmBtu pollutant emission factor provided by manufacturer Cleaver-Brooks x 1 ton / 2000 lbs x 1 year / 12 months

Pollutant emission factors provided by manufacturer Cleaver-Brooks when burning natural gas are as follows:

- i. 0.035 lbNO_x per mmBtu of heat input;
- ii. 0.0187 lb CO per mmBtu of heat input;
- iii. 0.0036 lb VOC per mmBtu of heat input;
- iv. 0.0019 lb filterable PM per mmBtu of heat input; and
- v. 0.0006 lb SO₂ per mmBtu of heat input.

If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with the following methods in 40 CFR Part 60, Appendix A:

- i. for NO_x: Methods 1 through 4 and 7;
- ii. for CO: Methods 1 through 4 and 10;
- iii. for VOC: Methods 1 through 4 and 25;
- iv. for PE: Methods 1 through 5; and
- v. for SO₂: Methods 1 through 4 and 6.

d. Emission Limitation:

When burning No. 2 fuel oil in B006, B007 and B008, combined, the following emission limitations shall apply:

- i. NO_x emissions shall not exceed 0.67 ton per month, averaged over a 12-month rolling period;
- ii. CO emissions shall not exceed 0.046 ton per month, averaged over a 12-month rolling period;
- iii. VOC emissions shall not exceed 0.0081 ton per month, averaged over a 12-month rolling period; and
- iv. PE shall not exceed 0.083 ton per month, averaged over a 12-month rolling period.



Applicable Compliance Method:

Compliance may be demonstrated through the record keeping requirements specified in d)(2)d through d)(2)f and the following equation:

Amount of No. 2 fuel oil burned per rolling-12 month period, in gallons x 138,500 Btu/gal No. 2 fuel oil (heat capacity of No. 2 fuel oil) x 1 mmBtu / 1,000,000 Btu x lb/mmBtu pollutant emission factor provided by manufacturer Cleaver-Brooks x 1 ton / 2000 lbs x 1 year / 12 months

Pollutant emission factors provided by manufacturer Cleaver-Brooks when burning natural gas are as follows:

- i. 0.115 lb NO_x per mmBtu of heat input;
- ii. 0.008 lb CO per mmBtu of heat input;
- iii. 0.0014 lb VOC per mmBtu of heat input; and
- iv. 0.0143 lb filterable PM per mmBtu of heat input.

If required, the permittee shall demonstrate compliance with the emission limitation through emission tests performed in accordance with the following methods in 40 CFR Part 60, Appendix A:

- v. for NO_x: Methods 1 through 4 and 7;
- vi. for CO: Methods 1 through 4 and 10;
- vii. for VOC: Methods 1 through 4 and 25; and
- viii. for PE: Methods 1 through 5.

e. Emission Limitation:

PE shall not exceed 0.020 lb per mmBtu of heat input 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 the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.



f. Emission Limitation:

Visible PE from the stack serving each emissions unit shall not exceed 20% opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method:

If required, compliance with the stack visible PE limitation shall be demonstrated through visible emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

g) Miscellaneous Requirements

(1) None.