



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

9/2/2016

Certified Mail

Mr. Matthew Vallance
 Ross Products - Division of Abbott
 585 Cleveland Ave
 Columbus, OH 43035

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: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0125040319
 Permit Number: P0115027
 Permit Type: Renewal
 County: Franklin

Dear Permit Holder:

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

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

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

Sincerely,

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

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



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Ross Products is located at 585 Cleveland Avenue in Columbus, Ohio and produces condensed and evaporated milk products. The facility has several large boilers, small food production related processes, emergency generators, and emergency water pumps.

3. Facility Emissions and Attainment Status:

The facility is not a major stationary source under Ohio Administrative Code (OAC) Chapter 3745-31-01(NNN)(2)(a)(xxii) as it is being restricted below 100 TPY on NO_x. The facility is located in Franklin County, Ohio, which is in marginal nonattainment for ozone and in attainment for all other criteria pollutants. Emissions from the facility include PM, SO₂, NO_x, VOC's, and CO. Overall emissions from this source are not changing with this permit as the facility is synthetically limited to 99 tons per year of NO_x.

The facility previously took a fuel restriction of 2,000,000 gallons/yr of oil containing 0.5% sulfur or 5,500,000 gallons/yr of oil containing 0.05% sulfur for their boilers. The capability to run the boilers on fuel oil was removed a few years back and the facility only uses natural gas in the boilers. As the boilers will only run on the combustion of natural gas, they meet the definition of inherently clean emissions unit.

The facility has the greatest potential to emit NO_x over the other pollutants and a limitation to 99 TPY of NO_x would limit the other pollutants potential to less than 99 TPY as well.

Currently, the facilities non-permitted sources (2 emergency generators and 2 emergency pumps) have the potential to emit 16.9 TPY of NO_x. Rounding to 17 TPY and subtracting this from the 99 TPY results in 82 TPY of NO_x that the facility can produce before exceeding 99 TPY. This can be used to back calculate the amount of natural gas that the boilers (B003, B004, and B005) can use (combined) before the facility exceeds 99 TPY of NO_x.

$(82 \text{ tons NO}_x/\text{yr} * 2,000 \text{ lbs/ton}) / 280 \text{ lbs NO}_x/10^6 \text{ scf of nat'l gas} = 585.71 \text{ } 10^6 \text{ scf of nat'l gas}$

Note: The emission factor used above is for the worst case scenario of only running B003 as it does not have low NO_x burners as B004 and B005 do. B003 has not been run for several years and is used as a backup to the other boilers on site and is therefore a conservative number.

The facility has agreed that this limitation would fit their operational needs. Actual emissions reported for the last several years have not exceeded 25 TPY of NO_x. The highest amount of natural gas used in recent years is 500 MMft³ of natural gas.

OAC rule 3745-18-31(L) – emission units are exempt from 4.8 lbs SO₂/MMBtu heat input as the emission unit only burns natural gas and is exempt under OAC rule 3745-18-06(A).



OAC rule 3745-31-05 low NOx burner requirement of PTI for B004 is being added as it was left off previously issued PTO.

40 CFR 60 Subpart Dc only has daily fuel record and initial notification requirements for B004 and B005 in permit as the ability to combust fuel oil has been removed from the boilers.

40 CFR Part 52.1881 refers to the general requirements found under OAC rule 3745-18-06 that were approved by USEPA. The boilers are now exempt from OAC rule 3745-18-06 as they only burn natural gas, so this citation is no longer needed.

40 CFR 60 Subpart Db is not applicable to B003 as the unit does not meet the definition of modified, constructed, or reconstructed since 1984. Install date was 1969.

4. Source Emissions:

Below calculations were completed using the worst case scenario of natural gas running through B003 only. B004 and B005 have low NOx burners that have a lower PTE of NOx, but in order to have a facility boiler wide fuel restriction, B003's higher NOx emission factor was used.

B003 (115 MMBtu Nat'l Gas Boiler) and B004 + B005 (98 MMBtu Nat'l Gas Boilers)
Emission factors from AP-42 Table 1.4-1 Large Wall-Fired Boilers (Uncontrolled Pre-NSPS)

NOx

$(280 \text{ lbs NOx}/10^6 \text{ scf nat'l gas} * 585.71 \text{ } 10^6 \text{ scf nat'l gas}) / 2,000 \text{ lbs/ton} = 82 \text{ TPY NOx}$

CO

$(84 \text{ lbs CO}/10^6 \text{ scf nat'l gas} * 585.71 \text{ } 10^6 \text{ scf nat'l gas}) / 2,000 \text{ lbs/ton} = 24.6 \text{ TPY CO}$

SO2

$(0.6 \text{ lbs SO}_2/10^6 \text{ scf nat'l gas} * 585.71 \text{ } 10^6 \text{ scf nat'l gas}) / 2,000 \text{ lbs/ton} = 0.2 \text{ TPY SO}_2$

VOC

$(5.5 \text{ lbs VOC}/10^6 \text{ scf nat'l gas} * 585.71 \text{ } 10^6 \text{ scf nat'l gas}) / 2,000 \text{ lbs/ton} = 1.6 \text{ TPY VOC}$

PM

$(7.6 \text{ lbs PM}/10^6 \text{ scf nat'l gas} * 585.71 \text{ } 10^6 \text{ scf nat'l gas}) / 2,000 \text{ lbs/ton} = 2.2 \text{ TPY PM}$

5. Conclusion:

Permit recordkeeping, while maintaining compliance with other terms and conditions in the permit, should ensure compliance with applicable state and federal rules.

6. Please provide additional notes or comments as necessary:

None



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

Pollutant	TPY	Facility (TPY)
NOx	82	99
CO	24.6	30.0
SO2	0.2	1.0
VOC	1.6	2.7
PM	2.2	3.3

PUBLIC NOTICE

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

Draft Air Pollution Permit-to-Install and Operate Renewal
Ross Products - Division of Abbott

585 CLEVELAND AVENUE,, Columbus, OH 43215

ID#:P0115027

Date of Action: 9/2/2016

Permit Desc:FEPTIO renewal for natural gas-fired boilers..

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



DRAFT

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

Facility ID:	0125040319
Permit Number:	P0115027
Permit Type:	Renewal
Issued:	9/2/2016
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Ross Products - Division of Abbott

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Draft Permit-to-Install and Operate

Ross Products - Division of Abbott

Permit Number: P0115027

Facility ID: 0125040319

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0125040319
Application Number(s): A0042513
Permit Number: P0115027
Permit Description: FEPTIO renewal for natural gas-fired boilers.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 9/2/2016
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Ross Products - Division of Abbott
585 CLEVELAND AVENUE
Columbus, OH 43215

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: P0115027

Permit Description: FEPTIO renewal for natural gas-fired boilers.

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

Emissions Unit ID:	B003
Company Equipment ID:	Boiler #3
Superseded Permit Number:	P0082701
General Permit Category and Type:	Not Applicable

Group Name: 98 MMBTU/hr Boilers

Emissions Unit ID:	B004
Company Equipment ID:	Boiler #4
Superseded Permit Number:	P0082701
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B005
Company Equipment ID:	Boiler #5
Superseded Permit Number:	P0082701
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
Ross Products - Division of Abbott
Permit Number: P0115027
Facility ID: 0125040319
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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



Draft Permit-to-Install and Operate
Ross Products - Division of Abbott
Permit Number: P0115027
Facility ID: 0125040319
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



1. Facility-Wide

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 facility-wide 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 facility-wide 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.b), B.1.c), B.1.d)(2) and B.1.e)(2)

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(D) (Synthetic Minor to avoid Title V)	See B.1.b)(2)a. below.

(2) Additional Terms and Conditions

a. The actual nitrogen oxides (NO_x) emissions from emissions units B003, B004, B005, and all other emission sources at the facility, including but not limited to any de minimis emissions units as defined in OAC rule 3745-15-05, or any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined shall not exceed 99 tons, based upon a rolling, 12-month summation.

c) Operational Restrictions

(1) The maximum annual natural gas usage rate for emission units B003, B004, and B005 shall not exceed 585.71 mmft³ per rolling, 12-month period.

d) Monitoring and/or Recordkeeping Requirements

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



- a. the rolling 12-month summation of NO_x emissions from emission units B003, B004, B005; all de minimis emission units; all permit exempt emission units; and all permit-by-rule emission units, combined, in tons.
- (2) The permittee shall collect and record the following information for each month for the boiler operations:
 - a. the total volume of natural gas (mmft³) burned in these emissions units; and
 - b. the monthly average over a rolling, 12-month period of the NO_x emissions.
- 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 District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit quarterly deviation (excursion) reports for the following emissions unit(s) that identify:

- 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 in this permit:

<u>Emissions unit ID</u>	<u>Term & Condition</u>
B003, B004, B005	B.1.b)(2)a.

- 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 Director (the appropriate District Office or local air agency).

[OAC rule 3745-15-03(B)(1)(b)] and [OAC rule 3745-15-03(C)]

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

[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)]

f) Testing Requirements

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

- a. Emission Limitation:

The emissions of NO_x from emissions units B003, B004, B005, and all other emission sources at the facility, including but not limited to any de minimis emissions units as defined in OAC rule 3745-15-05, or any registration status and/or permit exempt/permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 99 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance with these emissions limitations shall be determined through the recordkeeping requirements in B.1.d)(2).

g) Miscellaneous Requirements

- (1) None.



Draft Permit-to-Install and Operate
Ross Products - Division of Abbott
Permit Number: P0115027
Facility ID: 0125040319
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions

1. B003, Boiler #3

Operations, Property and/or Equipment Description:

Natural gas Murray boiler (115 MMBtu/hr)

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. C.1.b)(1)a. and C.1.d)(2)

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(D) (synthetic minor to avoid TV)	See B.1.b)(1)a. above and C.1.d)(2) below
b.	OAC rule 3745-17-07(A)(1)	See C.1.b)(2)a. below.
c.	OAC rule 3745-17-10(B)(1)	0.020 pound particulate emissions (PE) per million Btu of actual heat input

(2) Additional Terms and Conditions

a. Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain monthly records of the following information:
 - a. the total volume of natural gas (mmft³) burned in this emissions unit; and
 - b. the monthly average over a rolling, 12-month period of the NO_x emissions.

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 District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be submitted by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)]
- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

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



a. Emission Limitation:

0.020 pound PE per million Btu of actual heat input

Applicable Compliance Method:

As this unit uses only natural gas, compliance is determined by multiplying the maximum hourly gas burning capacity of the emissions unit (112,745 ft³/hr) by the AP-42 emission factor for natural gas combustion (7.6 lbs/MMft³), and dividing by the maximum hourly heat input capacity of the emissions unit (115 MMBtu/hr). This results in emissions of 0.00745 lbs PE/MMBtu.

b. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

[OAC rule 3745-17-03(B)(1)(a)]

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -98 MMBTU/hr Boilers: B004,B005,

EU ID	Operations, Property and/or Equipment Description
B004	Natural gas and fuel oil-fired Nebraska boiler (98 MMBtu/hr)
B005	Natural gas and fuel oil-fired Nebraska boiler (98 MMBtu/hr)

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. C.2.b)(1)b. and C.2.d)(5)

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.	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.
b.	OAC rule 3745-31-05(D) (synthetic minor to avoid TV)	See B.1.b)(1)a. above and C.2.d)(5) below
c.	OAC rule 3745-31-05(A)(3)	Use of low NO _x burners.
d.	OAC rule 3745-17-07(A)(1)	See C.2.b)(2)a. below.
e.	OAC rule 3745-17-10(B)(1)	0.020 pound particulate emissions



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		(PE) per million Btu of actual heat input

(2) Additional Terms and Conditions

a. Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

c) Operational Restrictions

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

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain a copy of the notification of the date of initial startup of the steam generating unit(s) required per 40 CFR 60.7. This notification should include the following information, identified for each subject steam generating unit, with any modification submitted (and a copy maintained) in a later report:

- a. the design heat input capacity and identification of the fuels to be combusted in each steam generating unit subject to Part 60 Subpart Dc;
- b. if applicable, a copy of any federally enforceable requirement that limits the annual capacity factor of any steam generating unit for a fuel or mixture of fuels under 40 CFR 60.42c(c)(2); 60.42c(e)(iii), and 60.43c(a) or (b); and
- c. if applicable, any annual capacity factor at which each steam generating unit is anticipated to be operated, based on all the fuels fired and each individual fuel fired.

[40 CFR 60.48c(a)(1) to (3)]

(2) The permittee shall record and maintain daily records of the amounts of each fuel combusted in each steam generating unit, except monthly fuel usage records may be maintained where meeting the requirements of 40 CFR 60.48c(g)(2) or (3) and combusting only natural gas, wood, or fuels certified in accordance with 40 CFR 60.48c(f).

[40 CFR 60.48c(g)]

(3) All records required under Subpart Dc of Part 60 shall be maintained by the permittee for a period of 2 years following the date of such record.

[40 CFR 60.48c(i)]

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

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

- a. the total volume of natural gas (mmft³) burned in this emissions unit; and
- b. the monthly average over a rolling, 12-month period of the NO_x emissions.

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 District Office or Local Air Agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

(2) 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. Electronic reports may be submitted to the agency through DAPC's "eBusiness Center, Air Services" website or may be submitted hard copy to the appropriate DAPC district or local air agency.

[40 CFR 60.48c]

(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. each 30-day average SO₂ emission rate (ng/J or lb/MMBtu), or 30-day average sulfur content (weight %), calculated during the reporting period, ending with the last 30-day period; reasons for any noncompliance with the emission standards; and a description of corrective actions taken;
- d. each 30-day average percent of potential SO₂ emission rate calculated during the reporting period, ending with the last 30-day period; reasons for any

noncompliance with the emission standards; and a description of the corrective actions taken;

- e. identification of any times when emissions data have been excluded from the calculation of average emission rates; justification for excluding data; and a description of corrective actions taken if data have been excluded for periods other than those during which coal or oil were not combusted in the steam generating unit.
- f. identification of the F factor used in calculations, method of determination, and type of fuel combusted;
- g. identification of any exceedance of a federally enforceable annual capacity factor for a fuel, to include the emission unit and amount of the exceedance.

[40 CFR 60.48c(a), (d), (e), (f), and (j)], [40 CFR 60.44c], [40 CFR 60.45c], [40 CFR 60.46c], [40 CFR 60.47c]

- (4) The permittee shall submit notification of any modifications made to a steam generating unit(s) that causes it/them to no longer meet the description of the unit, fuel, or the fuel usage identified in the initial notification submitted in accordance with under 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:
 - a. any change in the fuels to be combusted in each steam generating unit subject to Part 60 Subpart Dc;
 - b. if applicable, any change to a federally enforceable requirement that limited the annual capacity factor for any steam generating unit and the fuel or mixture of fuels identified under 40 CFR 60.42c(c)(2) or 60.42c(e)(1)(iii) and 60.43c(a) or (b); and
 - c. if applicable, any change to an annual capacity factor at which a steam generating unit is to be operated, based on all the fuels fired and each individual fuel fired.

[40 CFR 60.48c(a)]

- (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 permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

[OAC rule 3745-15-03(B)(2)] and [OAC rule 3745-15-03(D)]

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

f) Testing Requirements

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

a. Emission Limitation:

0.020 pound PE per million Btu of actual heat input

Applicable Compliance Method:

As this unit uses only natural gas, compliance is determined by multiplying the maximum hourly gas burning capacity of the emissions unit (96,078 ft³/hr) by the AP-42 emission factor for natural gas combustion (7.6 lbs/MMft³), and dividing by the maximum hourly heat input capacity of the emissions unit (98 MMBtu/hr). This results in emissions of 0.00745 lbs PE/MMBtu.

b. Emission Limitation:

Visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

[OAC rule 3745-17-03(B)(1)(a)]

g) Miscellaneous Requirements

(1) None.