

Facility ID: 1409040014 Issuance type: Final State Permit To Operate

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part II" and before "A. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

- [Go to Part II for Emissions Unit B003](#)
- [Go to Part II for Emissions Unit B004](#)
- [Go to Part II for Emissions Unit B005](#)
- [Go to Part II for Emissions Unit P002](#)

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Facility ID: 1409040014 Emissions Unit ID: B003 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B003 - 30 mmBtu/hr Natural Gas/No. 2 Oil-Fired Boiler	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.020 lbs/mmBtu of actual heat input when burning No. 2 fuel oil or natural gas.
	OAC rule 3745-18-15(J)	Sulfur dioxide (SO2) emissions shall not exceed 0.29 lbs/mmBtu of actual heat input for emissions unit B003.
	OAC rule 3745-35-07(B)	See term and condition B.1. See terms and conditions A.2.a, A.2.b, B.2, and B.3.

2. Additional Terms and Conditions

- (a) The combined total SO2 emissions from the burning of natural gas and No. 2 fuel oil in emissions units B003, B004, and B005 shall not exceed 26.1 tons per year (TPY), based upon a rolling, 12-month summation.
The combined total NOx emissions from the burning of natural gas and No. 2 fuel oil in emissions units B003, B004, and B005 shall not exceed 99.6 tons per year (TPY), based upon a rolling, 12-month summation.

B. Operational Restrictions

1. The daily average operating rate for emissions unit B003 shall not exceed 27 mmBtu/hour.
2. The combined maximum annual No. 2 fuel oil usage in emissions units B003, B004, and B005 shall not exceed 1,500,000 gallons, based upon a rolling, 12-month summation of No. 2 fuel oil usage. The permittee has existing records to demonstrate compliance upon issuance of this permit, therefore first year monthly fuel oil usage amounts are not necessary.
3. The sulfur content of each shipment of No. 2 fuel oil received for burning in this emissions unit shall not exceed 0.24% by weight.
4. The permittee shall burn only natural gas or No. 2 fuel oil in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas or No. 2 fuel oil, the permittee shall maintain and record the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain daily records of the following information:
 - a. the actual heat input for this emissions unit, in mmBtu/hr;

- b. the hours of operation for this emissions unit; and
 - c. the daily average operating rate, in mmBtu/hr, for this emissions unit.
- 3. The permittee shall maintain monthly records of the following information:
 - a. the total amount of No. 2 fuel oil (in gallons) burned in this emissions unit for each month;
 - b. the total amount of natural gas (in million cubic feet) burned in this emissions unit for each month;
 - c. the updated rolling, 12-month summation, in gallons, of No. 2 fuel oil burned in emissions units B003, B004, and B005 combined;
 - d. the total emissions, in tons, for SO₂ and NO_x for this emissions unit; and
 - e. the rolling, 12-month summation emissions total, in tons, for SO₂ and NO_x for emissions units B003, B004, and B005, combined.
- 4. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

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

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

a. Alternative 1:

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

b. Alternative 2:

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

D. Reporting Requirements

- 1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record which shows a deviation of the No. 2 fuel oil specification in Section B.3 above. The notification shall include a copy of the results of the fuel analyses and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
- 2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any fuel burned in this emissions unit other than natural gas or No. 2 fuel oil. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the deviation occurs.
- 3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the daily average operating rate exceeds the applicable limitation in Section B.1 above. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
- 4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedance of:
 - a. the rolling, 12-month No. 2 fuel oil usage limitation for emissions units B003, B004, and B005, combined;
 - b. the rolling, 12-month SO₂ emission limitation for emissions unit B003, B004, and B005, combined; and
 - c. the rolling, 12-month NO_x emission limitation for emissions unit B003, B004, and B005, combined.
- 5. The permittee shall submit annual reports that specify the total NO_x and SO₂ emissions from this emissions unit for the calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

- 1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:

Emissions Limitation:

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

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
Emission Limitation:

PE shall not exceed 0.020 lbs/mmBtu of actual heat input when burning No. 2 fuel oil or natural gas.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the PE emission limitation through emission tests performed in accordance with the Methods 1-5 of 40 CFR Part 60, Appendix A.
Emission Limitation:

SO2 emissions shall not exceed 0.29 lbs/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above SO2 emission limitation based on the monitoring and record keeping requirements in Section C.4 and the reporting requirements in Section D.1 of this permit. The SO2 emission rate shall be calculated pursuant to the equation specified in OAC rule 3745-18-04(F). When multiple fuels are burned, the SO2 emission rate is the sum of SO2 from all fuels burned divided by the sum of the Btu value of all fuels burned.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.
Emission Limitations:

The combined total SO2 emissions from the burning of natural gas and No. 2 fuel oil in emissions units B003, B004, and B005 shall not exceed 26.1 tons per year (TPY), based upon a rolling, 12-month summation.

The combined total NOx emissions from the burning of natural gas and No. 2 fuel oil in emissions units B003, B004, and B005 shall not exceed 99.6 tons per year (TPY), based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the SO2 and NOx emission limitations specified above shall be determined by the record keeping requirements specified in Section C.3.
Operational Restriction:

The daily average operating rate for emissions unit B003 shall not exceed 27 mmBtu/hour.

Applicable Compliance Method:

Compliance with the daily average operating rate restriction specified above shall be determined by the monitoring and record keeping requirements specified in Section C.2.
Operational Restrictions:

The combined maximum annual No. 2 fuel oil usage in emissions units B003, B004, and B005 shall not exceed 1,500,000 gallons, based upon a rolling, 12-month summation of No. 2 fuel oil usage.

Applicable Compliance Method:

Compliance with the fuel usage restrictions specified above shall be determined by the record keeping requirements specified in Section C.3.
Operational Restriction:

The sulfur content of each shipment of No. 2 fuel oil received for burning in this emissions unit shall not exceed 0.24% by weight.

Applicable Compliance Method:

Compliance with the No. 2 fuel oil sulfur content restriction specified above shall be determined by the record keeping requirements specified in Section C.4.

F. **Miscellaneous Requirements**

1. In accordance with OAC rule 3745-35-07(B), all of the terms and conditions contained in this permit are federally enforceable.

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Facility ID: 1409040014 Emissions Unit ID: B004 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B004 - 79 mmBtu/hr Natural Gas/No. 2 Oil-Fired Boiler	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.020 lbs/mmBtu of actual heat input when burning No. 2 fuel oil or natural gas.
	OAC rule 3745-18-15(J)	Sulfur dioxide (SO ₂) emissions shall not exceed 0.29 lbs/mmBtu of actual heat input for emissions unit B004.
		See term and condition B.1.
	OAC rule 3745-35-07(B)	See terms and conditions A.2.a, A.2.b, B.2, and B.3.

2. **Additional Terms and Conditions**
 - (a) The combined total SO₂ emissions from the burning of natural gas and No. 2 fuel oil in emissions units B003, B004, and B005 shall not exceed 26.1 tons per year (TPY), based upon a rolling, 12-month summation.
The combined total NO_x emissions from the burning of natural gas and No. 2 fuel oil in emissions units B003, B004, and B005 shall not exceed 99.6 tons per year (TPY), based upon a rolling, 12-month summation.

B. Operational Restrictions

1. The daily combined average operating rate for emissions units B004 and B005 shall not exceed 153 mmBtu/hour.
2. The combined maximum annual No. 2 fuel oil usage in emissions units B003, B004, and B005 shall not exceed 1,500,000 gallons, based upon a rolling, 12-month summation of No. 2 fuel oil usage. The permittee has existing records to demonstrate compliance upon issuance of this permit, therefore first year monthly fuel oil usage amounts are not necessary.
3. The sulfur content of each shipment of No. 2 fuel oil received for burning in this emissions unit shall not exceed 0.24% by weight.
4. The permittee shall burn only natural gas or No. 2 fuel oil in this emissions unit.

C. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than natural gas or No. 2 fuel oil, the permittee shall maintain and record the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain daily records of the following information for emissions units B004 and B005 combined:
 - a. the actual heat input, in mmBtu/hr;
 - b. the hours of operation; and
 - c. the daily average operating rate, in mmBtu/hr.
3. The permittee shall maintain monthly records of the following information:
 - a. the total amount of No. 2 fuel oil (in gallons) burned in this emissions unit for each month;
 - b. the total amount of natural gas (in million cubic feet) burned in this emissions unit for each month;
 - c. the updated rolling, 12-month summation, in gallons, of No. 2 fuel oil burned in emissions units B003, B004, and B005 combined;
 - d. the total emissions, in tons, for SO₂ and NO_x for this emissions unit; and
 - e. the rolling, 12-month summation emissions total, in tons, for SO₂ and NO_x for emissions units B003, B004, and B005, combined.

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

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

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

a. Alternative 1:

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

b. Alternative 2:

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

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record which shows a deviation of the No. 2 fuel oil specification in Section B.3 above. The notification shall include a copy of the results of the fuel analyses and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any fuel burned in this emissions unit other than natural gas or No. 2 fuel oil. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the deviation occurs.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the daily average operating rate exceeds the applicable limitation in Section B.1 above. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedance of:
 - a. the rolling, 12-month No. 2 fuel oil usage limitation for emissions units B003, B004, and B005, combined;
 - b. the rolling, 12-month SO₂ emission limitation for emissions unit B003, B004, and B005, combined; and
 - c. the rolling, 12-month NO_x emission limitation for emissions unit B003, B004, and B005, combined.
5. The permittee shall submit annual reports that specify the total NO_x and SO₂ emissions from this emissions unit for the calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emissions Limitation:

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

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

Emission Limitation:

PE shall not exceed 0.020 lbs/mmBtu of actual heat input when burning No. 2 fuel oil or natural gas.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the PE emission limitation through emission tests

performed in accordance with the Methods 1-5 of 40 CFR Part 60, Appendix A.

Emission Limitation:

SO2 emissions shall not exceed 0.29 lbs/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above SO2 emission limitation based on the monitoring and record keeping requirements in Section C.4 and the reporting requirements in Section D.1 of this permit. The SO2 emission rate shall be calculated pursuant to the equation specified in OAC rule 3745-18-04(F). When multiple fuels are burned, the SO2 emission rate is the sum of SO2 from all fuels burned divided by the sum of the Btu value of all fuels burned.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

Emission Limitations:

The combined total SO2 emissions from the burning of natural gas and No. 2 fuel oil in emissions units B003, B004, and B005 shall not exceed 26.1 tons per year (TPY), based upon a rolling, 12-month summation.

The combined total NOx emissions from the burning of natural gas and No. 2 fuel oil in emissions units B003, B004, and B005 shall not exceed 99.6 tons per year (TPY), based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the SO2 and NOx emission limitations specified above shall be determined by the record keeping requirements specified in Section C.3.

Operational Restriction:

The daily combined average operating rate for emissions units B004 and B005 shall not exceed 153 mmBtu/hour.

Applicable Compliance Method:

Compliance with the daily average operating rate restriction specified above shall be determined by the monitoring and record keeping requirements specified in Section C.2.

Operational Restrictions:

The combined maximum annual No. 2 fuel oil usage in emissions units B003, B004, and B005 shall not exceed 1,500,000 gallons, based upon a rolling, 12-month summation of No. 2 fuel oil usage.

Applicable Compliance Method:

Compliance with the fuel usage restrictions specified above shall be determined by the record keeping requirements specified in Section C.3.

Operational Restriction:

The sulfur content of each shipment of No. 2 fuel oil received for burning in this emissions unit shall not exceed 0.24% by weight.

Applicable Compliance Method:

Compliance with the No. 2 fuel oil sulfur content restriction specified above shall be determined by the record keeping requirements specified in Section C.4.

F. Miscellaneous Requirements

1. In accordance with OAC rule 3745-35-07(B), all of the terms and conditions contained in this permit are federally enforceable.

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Facility ID: 1409040014 Emissions Unit ID: B005 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

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1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B005 - 88 mmBtu/hr Natural Gas/No. 2 Oil-Fired Boiler	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.020 lbs/mmBtu of actual heat input when burning No. 2 fuel oil or natural gas.
	OAC rule 3745-18-15(J)	Sulfur dioxide (SO ₂) emissions shall not exceed 0.29 lbs/mmBtu of actual heat input for emissions unit B005.
	OAC rule 3745-35-07(B)	See term and condition B.1. See terms and conditions A.2.a, A.2.b, B.2, and B.3.

2. **Additional Terms and Conditions**

- (a) The combined total SO₂ emissions from the burning of natural gas and No. 2 fuel oil in emissions units B003, B004, and B005 shall not exceed 26.1 tons per year (TPY), based upon a rolling, 12-month summation.
The combined total NO_x emissions from the burning of natural gas and No. 2 fuel oil in emissions units B003, B004, and B005 shall not exceed 99.6 tons per year (TPY), based upon a rolling, 12-month summation.

B. **Operational Restrictions**

1. The daily combined average operating rate for emissions units B004 and B005 shall not exceed 153 mmBtu/hour.
2. The combined maximum annual No. 2 fuel oil usage in emissions units B003, B004, and B005 shall not exceed 1,500,000 gallons, based upon a rolling, 12-month summation of No. 2 fuel oil usage. The permittee has existing records to demonstrate compliance upon issuance of this permit, therefore first year monthly fuel oil usage amounts are not necessary.
3. The sulfur content of each shipment of No. 2 fuel oil received for burning in this emissions unit shall not exceed 0.24% by weight.
4. The permittee shall burn only natural gas or No. 2 fuel oil in this emissions unit.

C. **Monitoring and/or Record Keeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas or No. 2 fuel oil, the permittee shall maintain and record the type and quantity of fuel burned in this emissions unit.
2. The permittee shall maintain daily records of the following information for emissions units B004 and B005 combined:
 - a. the actual heat input, in mmBtu/hr;
 - b. the hours of operation; and
 - c. the daily average operating rate, in mmBtu/hr.
3. The permittee shall maintain monthly records of the following information:
 - a. the total amount of No. 2 fuel oil (in gallons) burned in this emissions unit for each month;
 - b. the total amount of natural gas (in million cubic feet) burned in this emissions unit for each month;
 - c. the updated rolling, 12-month summation, in gallons, of No. 2 fuel oil burned in emissions units B003, B004, and B005 combined;
 - d. the total emissions, in tons, for SO₂ and NO_x for this emissions unit; and
 - e. the rolling, 12-month summation emissions total, in tons, for SO₂ and NO_x for emissions units B003, B004, and B005, combined.
4. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

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

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

- a. Alternative 1:

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

b. Alternative 2:

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

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any record which shows a deviation of the No. 2 fuel oil specification in Section B.3 above. The notification shall include a copy of the results of the fuel analyses and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
2. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any fuel burned in this emissions unit other than natural gas or No. 2 fuel oil. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 30 days after the deviation occurs.
3. The permittee shall notify the Hamilton County Department of Environmental Services in writing of any daily record showing that the daily average operating rate exceeds the applicable limitation in Section B.1 above. The notification shall include a copy of such record and shall be sent to the Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
4. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedance of:
 - a. the rolling, 12-month No. 2 fuel oil usage limitation for emissions units B003, B004, and B005, combined;
 - b. the rolling, 12-month SO₂ emission limitation for emissions unit B003, B004, and B005, combined; and
 - c. the rolling, 12-month NO_x emission limitation for emissions unit B003, B004, and B005, combined.
5. The permittee shall submit annual reports that specify the total NO_x and SO₂ emissions from this emissions unit for the calendar year. These reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1 of these terms and conditions shall be determined in accordance with the following methods:
Emissions Limitation:

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

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).
Emission Limitation:

PE shall not exceed 0.020 lbs/mmBtu of actual heat input when burning No. 2 fuel oil or natural gas.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the PE emission limitation through emission tests performed in accordance with the Methods 1-5 of 40 CFR Part 60, Appendix A.
Emission Limitation:

SO₂ emissions shall not exceed 0.29 lbs/mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above SO₂ emission limitation based on the monitoring and record keeping requirements in Section C.4 and the reporting requirements in Section D.1 of this permit. The SO₂ emission rate shall be calculated pursuant to the equation specified in OAC rule 3745-18-04(F). When multiple fuels are burned, the SO₂ emission rate is the sum of SO₂ from all fuels burned divided by the sum of the Btu value of all fuels burned.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.
Emission Limitations:

The combined total SO2 emissions from the burning of natural gas and No. 2 fuel oil in emissions units B003, B004, and B005 shall not exceed 26.1 tons per year (TPY), based upon a rolling, 12-month summation.

The combined total NOx emissions from the burning of natural gas and No. 2 fuel oil in emissions units B003, B004, and B005 shall not exceed 99.6 tons per year (TPY), based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the SO2 and NOx emission limitations specified above shall be determined by the record keeping requirements specified in Section C.3.

Operational Restriction:

The daily combined average operating rate for emissions units B004 and B005 shall not exceed 153 mmBtu/hour.

Applicable Compliance Method:

Compliance with the daily average operating rate restriction specified above shall be determined by the monitoring and record keeping requirements specified in Section C.2.

Operational Restrictions:

The combined maximum annual No. 2 fuel oil usage in emissions units B003, B004, and B005 shall not exceed 1,500,000 gallons, based upon a rolling, 12-month summation of No. 2 fuel oil usage.

Applicable Compliance Method:

Compliance with the fuel usage restrictions specified above shall be determined by the record keeping requirements specified in Section C.3.

Operational Restriction:

The sulfur content of each shipment of No. 2 fuel oil received for burning in this emissions unit shall not exceed 0.24% by weight.

Applicable Compliance Method:

Compliance with the No. 2 fuel oil sulfur content restriction specified above shall be determined by the record keeping requirements specified in Section C.4.

F. Miscellaneous Requirements

1. In accordance with OAC rule 3745-35-07(B), all of the terms and conditions contained in this permit are federally enforceable.

THIS IS NOT AN OFFICIAL VERSION OF THE PERMIT. SEE PAGE 1 FOR ADDITIONAL INFORMATION

Facility ID: 1409040014 Emissions Unit ID: P002 Issuance type: Final State Permit To Operate

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Part II - Special Terms and Conditions

This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

1. For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (a) None.
2. For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (a) None.

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - Stock Preparation and Papermaking	OAC rule 3745-21-07(G)(2) OAC rule 3745-35-07(B)	Exempt. See term and condition B.1. See terms and conditions A.2.a., A.2.b, and B.2.

2. Additional Terms and Conditions

- (a) The maximum total annual emissions from this emissions unit shall not exceed the following emissions limitation based upon a rolling 12-month summation:

22.1 tons per year (TPY) of Volatile Organic Compounds (VOC).

The allowable emissions of Hazardous Air Pollutants (HAPs) as identified in Section 112(b) of Title III of the Clean Air Act from emissions unit P002 shall not exceed 8.9 TPY for any single HAP and 23.9 TPY for any combination of HAPs. Compliance with the above limitations shall be determined based upon a rolling, 12-month summation.

B. Operational Restrictions

1. This emission unit currently does not employ any photochemically reactive materials as defined in OAC rule 3745-21-01(C)(5). It is therefore exempt from all emission limitations and control requirements contained in OAC rule 3745-21-07(G).
2. The maximum annual VOC input, as applied, of liquid organic materials employed by this emissions unit shall not exceed 260 tons per year as a rolling 12-month summation.

The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect and record the following information each month:
 - a. the company identification of each liquid organic material employed in this emissions unit; and
 - b. a record of each liquid organic material employed in this emissions unit indicating, whether or not the liquid organic material is photochemically reactive as identified in OAC rule 3745-21-01(C)(5).
2. The permittee shall collect and record the following information each month for this emissions unit:
 - a. the name and identification of each liquid organic material employed;
 - b. the amount of each liquid organic material employed, in pounds;
 - c. the VOC content of each liquid organic material employed, in percent by weight;
 - d. the monthly VOC input (the summation of the results of the value from line b. multiplied by the value from line c. for each liquid organic material employed), then dividing by 2000; and
 - e. the updated rolling, 12-month summation total, in tons, of VOC input (the total amount of VOC input for the current month recorded in line d. plus the total amount of VOC input for the previous eleven calendar months).
3. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the total emissions, in tons, of VOC calculated by taking the monthly VOC input value from term C.2.d above and multiplying by the percentage of liquid organic material that is emitted to the air (8.5% based on permittee-provided papermaking water balance data contained in the FESOP application, submitted 4/25/2005), then dividing by 2000; and
 - b. the updated rolling, 12-month summation emissions total, in tons, of VOC (the amount of emissions for the current month plus the total amount of emissions for the previous eleven calendar months).
4. The permittee shall collect and record the following information each month for emissions unit P002:
 - a. the name and identification number of each papermaking chemical;
 - b. the individual Hazardous Air Pollutant (HAP) content for each HAP of each papermaking chemical in pounds of individual HAP per pound of papermaking chemical;
 - c. the total combined HAP content of each papermaking chemical in pounds of combined HAPs per pound of papermaking chemical [sum all the individual HAP contents from (b)];
 - d. the number of pounds of each papermaking chemical employed;
 - e. the total individual HAP emissions for each HAP from all papermaking chemicals employed, in pounds or tons per month [for each HAP the sum of (b) times (d)];
 - f. the total combined HAP emissions from all papermaking chemicals employed, in pounds or tons per month [the sum of (c) times (d)];
 - g. the updated rolling, 12-month summation of the individual HAP emissions for each HAP from all papermaking chemicals employed, in pounds or tons; and
 - h. the updated rolling, 12-month summation of the combined HAP emissions for all HAP from all papermaking chemicals employed, in pounds or tons.

A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact.

D. Reporting Requirements

1. The permittee shall notify the Hamilton County Department of Environmental Services in writing identifying each day during which any photochemically reactive material (as defined in OAC rule 3745-21-01(C)(5)) was employed in this emissions unit. This report shall identify the cause for the use of the photochemically reactive material(s) and the estimated total quantity of organic compound emissions emitted each such day. This report shall be submitted to the Hamilton County Department of Environmental Services within 45 days after the exceedance occurs.
2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following for this emissions unit:

- a. an identification of all exceedances of the rolling, 12-month VOC input operational restriction as specified in term B.2;
 - b. an identification of all exceedances of the rolling, 12-month emission limitation for VOC as specified in term A.2.a; and
 - c. an identification of all exceedances of the rolling, 12-month emission limitations for individual and combined HAPs as specified in term A.2.b.

The deviation reports shall be submitted to the Hamilton County Department of Environmental Services in accordance with the reporting requirements specified in Part I - General Terms and Conditions of this permit.

3. The permittee shall notify Hamilton County Department of Environmental Services in writing prior to employing any liquid organic materials that contain a higher percentage VOC content by weight than those contained in the FESOP application submitted 4/25/2005, for this emissions unit. This notification shall include information sufficient to determine if the materials comply with the existing permit limitations. If the use of the material(s) will not comply with the existing permit limitations, the permittee shall not use the material until a permit modification is issued.

E. Testing Requirements

1. In order to demonstrate compliance with exemption for photochemically reactive materials specified in term B.1, the permittee shall use formulation data provided by the organic material manufacturer or laboratory analysis to determine the organic composition of each solvent employed in this emissions unit.
2. Emissions Limitation:
22.1 tons per year of VOC as a rolling 12-month summation

Applicable Compliance Method:
The VOC emission limitation specified above was established based on the permittee-supplied engineering emissions analysis and material balance data that demonstrates 8.5 percent of the papermaking liquid organic materials employed evaporates to the air, as provided in the FESOP application submitted 4/25/2005. Compliance with the VOC emission limitation specified above shall be determined by the record keeping requirements specified in term C.3.
3. Operational Restriction:
260 tons per year as a rolling 12-month summation of monthly VOC input

Applicable Compliance Method:
Compliance with the VOC material input limitation specified above shall be determined by the record keeping requirements specified in term C.2.
4. Compliance with the HAP emission limitations in term A.2.b shall be determined by the record keeping in term C.4.

F. Miscellaneous Requirements

1. In accordance with OAC rule 3745-35-07(B), all of the terms and conditions contained in this permit are federally enforceable.