

Facility ID: 1576130696 Issuance type: Draft 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 B008](#)
- [Go to Part II for Emissions Unit B009](#)
- [Go to Part II for Emissions Unit P081](#)
- [Go to Part II for Emissions Unit P082](#)

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Facility ID: 1576130696 Emissions Unit ID: B008 Issuance type: Draft 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>
0.777 MMBtu/hr, natural gas fired boiler, mill office boiler (with stack)	OAC Rule 3745-17-10, including but not limited to OAC Rule 3745-17-10 (B) (1)	Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.
(Same)	OAC Rule 3745-18-06, including but not limited to OAC Rule 3745-18-06 (A)	Sulfur dioxide emissions shall not exceed 1.6 lbs/MMBtu actual heat input if fuel heat content is < 950 Btu per standard cubic foot and sulfur content is > 0.6 pound per MMSCF.
(Same)	OAC Rule 3745-17-07, including but not limited to OAC Rule 3745-17-07 (A)	Visible Emission Limits (See Additional Terms & Conditions 2.b.)

2. Additional Terms and Conditions

- (a) The total NOx emissions from this facility shall not exceed 95 tons/yr. This annual emission limit shall be obtained by limiting the amount of natural gas burned at this facility. The burning of natural gas is the only source of NOx emissions.

The NOx emission limitations and fuel consumption restrictions are for the following emissions units at this facility:

B008, B009, P081, P082 and the following exempt equipment: 18" Mill Torch Cutting Operation, Product Scrap Preparation/Torch Cutting Operations, Maintenance Scrap Preparation/Torch Cutting Operations, Machine Shop Parts Heater, Chain Repair Furnace & Space and Water Heaters.
Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions from this emissions unit's stack may exceed twenty percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

B. Operational Restrictions

1. Natural gas shall be the only fuel burned in this emissions unit.
2. The total natural gas burned at this facility shall not exceed 1,318 MMCF as a rolling, twelve-month summation. (Each month will establish a separate twelve-month period.)
3. To ensure enforceability during the first twelve calendar months of operation under this permit, the natural gas usage at this facility shall not exceed the cumulative usage limits specified for each calendar month in the following table:

Calendar Month(s)	Allowable Total Cumulative Natural Gas Consumption (MMCF)
1	146
1-2	286

- 1-3 424
 1-4 532
 1-5 630
 1-6 724
 1-7 815
 1-8 900
 1-9 988
 1-10 1080
 1-11 1198
 1-12 1318

After the first 12 calendar months of operation under this permit, compliance with the annual cubic feet limitation shall be based upon a rolling, twelve-month summation of the natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records which list the following information:
 The total natural gas usage for all emissions units at the facility.
 Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, twelve-month summation of the number of cubic feet of natural gas burned at this facility. (Each month will establish a separate twelve-month period.)
 During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports within 30 days following the end of each month during which an excursion occurred that identify the following:
 All exceedances of the maximum allowable cumulative natural gas usage during the first 12 calendar months of operation following the issuance of this permit.
 After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling, 12-month natural gas usage limitation of 1,318 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NO_x emissions and the total amount of natural gas used at this facility for the previous calendar year.

(See the reporting requirements in Part I, General Terms & Conditions, Subpart I.3.)

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these Terms & Conditions shall be determined in accordance with the following method(s):

Emission Limitation:
 Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.

Applicable Compliance Method:
 The AP-42 emission factor for filterable particulate emissions, 6.2 lbs/MMCF, shall be used to show compliance with the allowable particulate emission rate.

Emission Limitation:
 The total NO_x emissions from this facility shall not exceed 95 tons/yr.

Applicable Compliance Method:
 The NO_x emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF})(X)] / 2000$$

Where: Z = NO_x emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:
 Opacity shall not exceed 20%, except for one 6-minute period in any hour when up to 60% is permissible.

Applicable Compliance Method:
 OAC Rule 3745-17-03 (B) (1), EPA Method nine (9).

Emission Limitation:
 Sulfur dioxide emissions shall not exceed 1.6 lbs/MMBtu actual heat input.

Applicable Compliance Method:
 The AP-42 emission factor, 0.6 lb/MMCF, for natural gas combustion shall be used to show compliance with the allowable sulfur dioxide emission rate.

F. Miscellaneous Requirements

1. By request of the applicant and pursuant to OAC 3745-35-07, the following listed Special Terms & Conditions are federally enforceable and incorporate limits on the potential to emit NO_x for this emissions unit (B008) in combination with B009, P081, P082 and other equipment exempt from permitting: A through F.

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Facility ID: 1576130696 Emissions Unit ID: B009 Issuance type: Draft 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>
4.2 MMBtu/hr, natural gas fired boiler, main office boiler (with stack)	OAC Rule 3745-17-10, including but not limited to OAC Rule 3745-17-10 (B) (1)	Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.
(Same)	OAC Rule 3745-18-06, including but not limited to OAC Rule 3745-18-06 (A)	Sulfur dioxide emissions shall not exceed 1.6 lbs/MMBtu actual heat input if fuel heat content is < 950 Btu per standard cubic foot and sulfur content is > 0.6 pound per MMSCF.
(Same)	OAC Rule 3745-17-07, including but not limited to OAC Rule 3745-17-07 (A)	Visible Emission Limits (See Additional Terms & Conditions 2.b.)

2. Additional Terms and Conditions

- (a) The total NOx emissions from this facility shall not exceed 95 tons/yr. This emission limit shall be obtained by limiting the amount of natural gas burned at this facility. The burning of natural gas is the only source of NOx emissions.

The NOx emission limitations and fuel consumption restrictions are for the following emissions units at this facility:

B008, B009, P081, P082 and the following exempt equipment: 18" Mill Torch Cutting Operation, Product Scrap Preparation/Torch Cutting Operations, Maintenance Scrap Preparation/Torch Cutting Operations, Machine Shop Parts Heater, Chain Repair Furnace & Space and Water Heaters. Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity, as a six-minute average, except that visible particulate emissions from this emissions unit's stack may exceed twenty percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

B. Operational Restrictions

1. Natural gas shall be the only fuel burned in this emissions unit.
2. The total natural gas burned at this facility shall not exceed 1,318 MMCF as a rolling twelve-month summation, with each month establishing a separate twelve-month period.
3. To ensure enforceability during the first twelve calendar months of operation under this permit, the natural gas usage at this facility shall not exceed the cumulative usage limits specified for each calendar month in the following table:

Calendar Month(s) Allowable Total Cumulative Natural Gas Consumption (MMCF)

- 1 146
- 1-2 286
- 1-3 424
- 1-4 532
- 1-5 630
- 1-6 724
- 1-7 815
- 1-8 900
- 1-9 988
- 1-10 1080
- 1-11 1198
- 1-12 1318

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage limitation shall be based upon a rolling 12-month summation of the monthly natural gas

usage.

C. Monitoring and/or Record Keeping Requirements

- The permittee shall maintain records of the following information:
The total natural gas usage for all emissions units at the facility.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

- The permittee shall submit deviation (excursion) reports within 30 days following the end of each month during which an excursion occurred that identify the following:
All exceedances of the maximum allowable cumulative natural gas usage during the first 12 calendar months of operation following the issuance of this permit.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling 12-month natural gas usage limitation of 1,318 MMCF.
- The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emission and the total amount of natural gas used at this facility during the previous calendar year.

(See the reporting requirements in Part I, General Terms & Conditions, Subpart I.3.)

E. Testing Requirements

- Compliance with the emission limitation(s) in Section A of these Terms & Conditions shall be determined in accordance with the following method(s):

Emission Limitation:
Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.

Applicable Compliance Method:
The AP-42 emission factor for filterable particulate emissions, 6.2 lbs/MMCF, shall be used to show compliance with the allowable particulate emission rate.

Emission Limitation:
The total NOx emissions from this facility shall not exceed 95 tons/yr.

Applicable Compliance Method:
The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:
Opacity shall not exceed 20%, except for one 6-minute period in any hour when up to 60% is permissible.

Applicable Compliance Method:
OAC rule 3745-17-03 (B)(1), EPA Method nine (9).

Emission Limitation:
Sulfur dioxide emissions shall not exceed 1.6 lbs/MMBtu actual heat input.

Applicable Compliance Method:
The AP-42 emission factor, 0.6 lb/MMCF, for natural gas combustion shall be used to show compliance with the allowable sulfur dioxide emission rate.

F. Miscellaneous Requirements

- By request of the applicant and pursuant to OAC 3745-35-07, the following listed Special Terms & Conditions are federally enforceable and incorporate limits on the potential to emit NOx for this emissions unit (B009) in combination with B008, P081, P082 and other equipment exempt from permitting: A through F.

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Facility ID: 1576130696 Emissions Unit ID: P081 Issuance type: Draft 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).

- 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>
12.3 MMBtu/hr, natural gas fired heat treat furnace, 12" mill heat treat furnace (without stack)	OAC Rule 3745-35-07	No particulate limit since this facility is not in a 3745-17-08 Appendix A area. (See Additional Terms & Conditions.)

2. Additional Terms and Conditions

- (a) The total NOx emissions from this facility shall not exceed 95 tons/yr. This annual emission limit shall be met by limiting the amount of natural gas burned at this facility. The burning of natural gas is the only source of NOx emissions.

The NOx emission limitations and fuel consumption restrictions are for the following emissions units at this facility:

B008, B009, P081, P082 and the following exempt equipment: 18" Mill Torch Cutting Operation, Product Scrap Preparation/Torch Cutting Operations, Maintenance Scrap Preparation/Torch Cutting Operations, Machine Shop Parts Heater, Chain Repair Furnace & Space and Water Heaters.

B. Operational Restrictions

- 1. Natural gas shall be the only fuel burned in this emissions unit.
- 2. The total natural gas burned at this facility shall not exceed 1,318 MMCF as a rolling twelve-month summation. (Each month will establish a separate twelve-month period.)
- 3. To ensure enforceability during the first twelve calendar months of operation under this permit, the natural gas usage at this facility shall not exceed the cumulative usage limits specified for each calendar month in the following table:

Calendar Month(s) (After Permit Issuance)	Allowable Total Cumulative Natural Gas Consumption (MMCF)
1	146
1-2	286
1-3	424
1-4	532
1-5	630
1-6	724
1-7	815
1-8	900
1-9	988
1-10	1080
1-11	1198
1-12	1318

After the first 12 calendar months of operation under this permit, compliance with the annual cubic feet limitation shall be based upon a rolling, twelve-month summation of the natural gas usage.

C. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall maintain records of the following information:
 - The total natural gas usage for all emissions units at the facility. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling twelve-month summation of the number of cubic feet of natural gas burned at this facility. (Each month will establish a separate twelve-month period.)
 - During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

- 1. The permittee shall submit deviation (excursion) reports within 30 days following the end of each month during which an excursion occurred that identify the following:
 - For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage.
 - After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling twelve-month natural gas usage limitation of 1,318 MMCF.
- 2. The permittee shall submit annual reports by February 15 of each year, showing the facility-wide total NOx

emissions and the total amount of natural gas used during the previous calendar year.

(See the reporting requirements in Part I, General Terms & Conditions, Subpart 1.3.)

E. Testing Requirements

1. Compliance with the emission limitation(s) in Sections A of these Terms & Conditions shall be determined in accordance with the following method(s):

Emission Limitation:

The total NOx emissions from this facility shall not exceed 95 tons/yr.

Applicable Compliance Method:

The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

F. Miscellaneous Requirements

1. Federally Enforceable Limitation on Potential to Emit

By request of the applicant and pursuant to OAC Rule 3745-35-07, the following listed Special Terms and Conditions are federally enforceable and incorporated into this permit to limit the potential to emit NOx for this emissions unit (P081), in combination with B008, B009, P082 and some exempt from permitting equipment: A through F.

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Facility ID: 1576130696 Emissions Unit ID: P082 Issuance type: Draft 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>
137 MMBtu/hr, natural gas fired reheat furnace, 18" mill reheat furnace (with stack)	OAC Rule 3745-35-07	(See Additional Terms & Conditions.)
(Same)	OAC Rule 3745-17-07(A)	Visible Emission Limit (See Additional Terms & Conditions 2.b.)
(Same)	OAC Rule 3745-17-11	No process weight can be determined; therefore, no applicable emission limit.

2. Additional Terms and Conditions

- (a) The total NOx emissions from this facility shall not exceed 95 tons/yr. This emission limit shall be obtained by limiting the amount of natural gas burned at this facility. The burning of natural gas is the only source of NOx emissions.

The NOx emission limitations and fuel consumption restrictions are for the following emissions units at this facility:

B008, B009, P081, P082 and the following exempt equipment: 18" Mill Torch Cutting Operation, Product Scrap Preparation/Torch Cutting Operations, Maintenance Scrap Preparation/Torch Cutting Operations, Machine Shop Parts Heater, Chain Repair Furnace & Space and Water Heaters. Visible particulate emissions from this emissions unit's stack shall not exceed twenty percent opacity,

as a six-minute average, except that visible particulate emissions from this emissions unit's stack may exceed twenty percent opacity, as a six-minute average, for not more than six consecutive minutes in any sixty minutes, but shall not exceed sixty percent opacity, as a six-minute average, at any time.

B. Operational Restrictions

1. Natural gas shall be the only fuel burned in this emissions unit.
2. The total natural gas burned at this facility shall not exceed 1,318 MMCF as a rolling, twelve-month summation. (Each month will establish a separate twelve-month period.)
3. To ensure enforceability during the first twelve calendar months of operation under this permit, the natural gas usage at this facility shall not exceed the cumulative usage limits specified for each calendar month in the following table:

Calendar Month(s) Allowable Total Cumulative Natural
(After Permit Issuance) Gas Consumption (MMCF)

1 146
1-2 286
1-3 424
1-4 532
1-5 630
1-6 724
1-7 815
1-8 900
1-9 988
1-10 1080
1-11 1198
1-12 1318

After the first 12 calendar months of operation under this permit, compliance with the annual cubic feet limitation shall be based upon a rolling, twelve-month summation of the natural gas usage.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain records which list the following information:
The total natural gas usage for all emissions units at the facility.
Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, twelve-month summation of the number of cubic feet of natural gas burned at this facility. (Each month will establish a separate twelve-month period.)
During the first 12 calendar months of operation following the issuance of this permit, the cumulative amount of natural gas burned in all emissions units at this facility.

(For records retention requirements, see Part I, General Terms and Conditions, Subpart I.4.)

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports within 30 days following the end of each month during which an excursion occurred that identify the following:
For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage at this facility.
After the first 12 calendar months following the issuance of this permit, any exceedances of the rolling, twelve-month natural gas usage limitation of 1,318 MMCF.
2. The permittee shall submit annual reports by February 15 of each year showing the facility-wide total NOx emissions and the total amount of natural gas used during the previous calendar year.

(See the reporting requirements in Part I, General Terms & Conditions, Subpart I.3.)

E. Testing Requirements

1. Compliance with the emission limitation(s) in Section A of these terms & conditions shall be determined in accordance with the following method(s):

Emission Limitation:
The total NOx emissions from this facility shall not exceed 95 tons/yr.

Applicable Compliance Method:
The NOx emissions shall be calculated in accordance with the following equation:

$$Z = [(144.2 \text{ lbs/MMCF}) (X)] / 2000$$

Where: Z = NOx emissions, in tons, for the year.

X = amount of natural gas burned during the year in all of the emissions units listed in A.2.a above, expressed in MMCF.

Emission Limitation:
Opacity shall not exceed 20%, except for one 6-minute period in any hour when up to 60% is permissible.

Applicable Compliance Method:
OAC Rule 3745-17-03 (B) (1), EPA Method nine (9)

F. Miscellaneous Requirements

1. Federally Enforceable Limitation on Potential to Emit

By request of the applicant and pursuant to OAC Rule 3745-35-07, the following listed Special Terms and Conditions are federally enforceable and incorporated into this permit to limit the potential to emit NOx for this

emissions unit (P082) in combination with P081, B008, B009 and other equipment exempt from permitting: A through F.