



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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50 W. Town St., Suite 700
Columbus, Ohio 43215

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www.epa.state.oh.us

MAILING ADDRESS:

P.O. Box 1049
Columbus, OH 43216-1049

5/8/2009

Scott Forster
Hardy Industrial Technologies, LLC
673 Hardy Road
Painesville Township, OH 44077

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0243000074
Permit Number: P0104342
Permit Type: Initial Installation
County: Lake

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate ("PTIO") which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully.

Ohio EPA maintains a document entitled "Frequently Asked Questions about the PTIO". The document can be downloaded from the DAPC Web page, www.epa.state.oh.us/dapc, from the "Permits" link. This document contains additional information related to your permit, such as what activities are covered under the PTIO, who has enforcement authority over the permit and Ohio EPA's authorization to inspect your facility and records. Please contact the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469 if you need assistance.

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of \$70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern
Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Ohio EPA-NEDO

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

FINAL

**Air Pollution Permit-to-Install and Operate
for
Hardy Industrial Technologies, LLC**

Facility ID: 0243000074
Permit Number: P0104342
Permit Type: Initial Installation
Issued: 5/8/2009
Effective: 5/8/2009
Expiration: 5/8/2019



Air Pollution Permit-to-Install and Operate
for
Hardy Industrial Technologies, LLC

Table of Contents

Authorization 1

A. Standard Terms and Conditions 3

 1. What does this permit-to-install and operate ("PTIO") allow me to do?..... 4

 2. Who is responsible for complying with this permit? 4

 3. What records must I keep under this permit? 4

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

 5. When does my PTIO expire, and when do I need to submit my renewal application? 4

 6. What happens to this permit if my project is delayed or I do not install or modify my source? 5

 7. What reports must I submit under this permit? 5

 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? 5

 9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?... 5

 10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report? 6

 11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located? 6

 12. What happens if one or more emissions units operated under this permit is/are shut down permanently? 6

 13. Can I transfer this permit to a new owner or operator?..... 6

 14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"? 7

 15. What happens if a portion of this permit is determined to be invalid? 7

B. Facility-Wide Terms and Conditions..... 8

C. Emissions Unit Terms and Conditions 10

 1. B010, Uniflux Hot Oil Heater Modified to burn landfill derived methane gas (LDMG).....11

 2. Emissions Unit Group - NG Cleaner Brooks Boilers 1 and 2 w/LFG as backup fuel: B011 and B012.....15

 3. Emissions Unit Group - Burnham Steam Boilers 1 and 2: B013 and B014, w/Landfill gas usage as backup.....19

 4. B015, 9.97 MMBTU/Hr SFA Fulton Hot Oil Heater with Landfill gas fuel as backup operations, Property and/or Equipment Description:.....23



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate
Permit Number: P0104342
Facility ID: 0243000074
Effective Date: 5/8/2009

Authorization

Facility ID: 0243000074
Application Number(s): A0036575
Permit Number: P0104342
Permit Description: Installation of 6 boilers/heaters (B010 - B015)
Permit Type: Initial Installation
Permit Fee: \$2,400.00
Issue Date: 5/8/2009
Effective Date: 5/8/2009
Expiration Date: 5/8/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Hardy Industrial Technologies, LLC
679 HARDY RD
Painesville, OH 44077

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 43087
(330)425-9171

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

Chris Korleski
Director



Authorization (continued)

Permit Number: P0104342
Permit Description: Installation of 6 boilers/heaters (B010 - B015)

Permits for the following emissions unit(s) or groups of emissions units are in this document as indicated below:

Emissions Unit ID: B010
Company Equipment ID: Uni. Hot Oil Heater
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Emissions Unit ID: B015
Company Equipment ID: SFA Fulton Heater
Superseded Permit Number:
General Permit Category and Type: Not Applicable

Group Name: B011 and B012 CB Boilers

Emissions Unit ID:	B011
Company Equipment ID:	#1 CB Steam Boiler
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B012
Company Equipment ID:	#2 CB Steam Boiler
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: B013 and B014 Burnham Boilers

Emissions Unit ID:	B013
Company Equipment ID:	#1 Burnham Steam Boiler
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B014
Company Equipment ID:	#2 Burnham Steam Boiler
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104342

Facility ID: 0243000074

Effective Date: 5/8/2009

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 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, Northeast 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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104342

Facility ID: 0243000074

Effective Date: 5/8/2009

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104342

Facility ID: 0243000074

Effective Date: 5/8/2009

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104342

Facility ID: 0243000074

Effective Date: 5/8/2009

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104342

Facility ID: 0243000074

Effective Date: 5/8/2009

C. Emissions Unit Terms and Conditions



1. B010, Uniflux Hot Oil Heater modified to burn landfill derived methane gas (LDMG)

Operations, Property and/or Equipment Description:

Uniflux Heater rated at 5.6 mmBtu/hr with landfill gas fuel as backup

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. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	See b)(2)b below.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.02 pound per mmBtu of actual heat input. See b)(2)d below.

(2) Additional Terms and Conditions

a. This is a Permit to Install and Operate (PTIO) for the modification of an existing 5.6 mmBtu/hr Uniflux hot oil heater (Ohio EPA emissions unit B010) to burn treated landfill derived methane gas along with the existing fuel, natural gas, or use of natural gas only.

b. The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to sulfur dioxide (SO2), hydrochloric acid (HCl), nitrogen oxides



(NOx), volatile organic compounds (VOC) and carbon monoxide (CO) emissions, and particulate emissions (PE) from this air contaminant source, since the calculated annual uncontrolled emission rates per emissions unit, based on AP-42, Chapters/Sections 1.4 and 2.4 and previous stack tests are less than 10 tons per year. Following are the maximum annual emissions:

SO2	0.18 ton per year;
HCl	0.12 ton per year;
NOx	2.62 tons per year;
VOC	3.36 tons per year;
CO	2.20 tons per year; and
PE	0.50 ton per year.

- c. The calculated PE potential to emit for this emissions unit is less than the emission limitation in b)(1) of this permit. Therefore, no monitoring, record keeping, reporting or testing is required to demonstrate compliance with this emission limitation.
- d. The permittee shall tune this fuel burning equipment yearly or follow the most recent recommendation from the vendor.

c) Operational Restrictions

- (1) The permittee shall burn only treated landfill gas, and/or natural gas in this emissions unit. For purposes of this term, treated landfill gas shall mean landfill gas that passes through a treatment system that is designed and operated to meet the requirements of the NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) and which meets the definition of a treatment system as described in the December 28, 2005 USEPA Applicability Determination letter from Judith M. Katz along with any USEPA updates to this definition.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall record and maintain daily fuel combustion records of each fuel combusted during each day and a record of the type and quantity of any fuel burned in this emissions unit other than landfill gas and/or natural gas.
- (2) During the operation of this emissions unit for the use of landfill gas as a supplemental fuel, the permittee shall have and be able to present during normal business hours a certificate from the landfill gas provider verifying that landfill gas fuel provided to the permittee is treated as required in the Standards of Performance for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW).

Further, no later than 15 calendar days prior to the compliance date for any applicable updates or changes to treatment required in 40 CFR Part 60, Subpart WWW, the landfill gas provider shall issue a certificate documenting that the landfill gas used by the permittee is treated in accordance with the new requirements. The permittee shall keep and maintain the treatment certification for the life of this emissions unit.



e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or treated (including any updates to the definitions of treatment) landfill gas was burned in this emissions unit and the amount of the fuel.
- (2) The permittee shall notify the Northeast District Office of the Ohio EPA, in writing, within 45 days of receiving notice from the landfill gas provider that untreated landfill gas, as defined and regulated under Standards of Performance for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW), was provided to the permittee. The written notice shall document the time period when untreated landfill gas was supplied to the permittee and include an estimate of the quantity of untreated landfill gas received from the landfill gas provider.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations and operational restriction in b)(1) and c)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

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

b. Emission Limitation:

PE shall not exceed 0.02 pound per mmBtu of actual heat input.

Applicable Compliance Method:

The potential to emit of this emissions unit is less than the PE emission limitation and therefore demonstrates compliance with this requirement.

c. Operational Restriction:

The permittee shall burn only treated landfill gas, and/or natural gas in this emissions unit. For purposes of this term, treated landfill gas shall mean landfill gas that passes through a treatment system that is designed and operated to meet the requirements of the NSPS for Municipal Solid Waste Landfills (40 CFR



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0104342

Facility ID: 0243000074

Effective Date: 5/8/2009

Part 60, Subpart WWW) and which meets the definition of a treatment system as described in the December 28, 2005 USEPA Applicability Determination letter from Judith M. Katz along with any USEPA updates to this definition.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) and d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.



2. Emissions unit Group – NG Cleaver Brooks Boilers 1 and 2 w/LFG as backup fuel: B011 and B012

Operations, Property and/or Equipment Description:

B011 #1 NG Cleaver Brooks Steam Boiler rated at 9.415 mmBtu/hr; use of landfill gas as backup fuel

B012 #2 NG Cleaver Brooks Steam Boiler rated at 9.415 mmBtu/hr; use of landfill gas as backup fuel

All terms and conditions apply to each of B011 and B012 individually.

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. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	See b)(2)b below.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.02 pound per mmBtu of actual heat input. See b)(2)d below.



(2) Additional Terms and Conditions

- a. This is a Permit to Install and Operate (PTIO) for the modification of existing 9.415 mmBtu/hr numbers 1 and 2 Cleaver Brooks Boilers (Ohio EPA emissions units B011 and B012) to burn landfill derived methane gas along with the existing fuel, natural gas, or use of natural gas only.
- b. The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to sulfur dioxide (SO₂), hydrochloric acid (HCl), nitrogen oxides (NO_x), volatile organic compounds (VOC) and carbon monoxide (CO) emissions, and particulate emissions (PE) from this air contaminant source, since the calculated annual uncontrolled emission rates per emissions unit, based on AP-42, Chapters/Sections 1.4 and 2.4 and previous stack tests are less than 10 tons per year. Following are the maximum annual emissions:
 - SO₂ 0.18 ton per year;
 - HCl 0.20 ton per year;
 - NO_x 4.10 tons per year;
 - VOC 5.30 tons per year;
 - CO 3.40 tons per year; and
 - PE 0.90 ton per year.
- c. The calculated PE potential to emit for this emissions unit is less than the emission limitation in b)(1) of this permit. Therefore, no monitoring, record keeping, reporting or testing is required to demonstrate compliance with this emission limitation.
- d. The permittee shall tune this fuel burning equipment yearly or follow the most recent recommendation from the vendor.

c) Operational Restrictions

- (1) The permittee shall burn only treated landfill gas, and/or natural gas in this emissions unit. For purposes of this term, treated landfill gas shall mean landfill gas that passes through a treatment system that is designed and operated to meet the requirements of the NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) and which meets the definition of a treatment system as described in the December 28, 2005 USEPA Applicability Determination letter from Judith M. Katz along with any USEPA updates to this definition.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall record and maintain daily fuel combustion records of each fuel combusted during each day and a record of the type and quantity of any fuel burned in this emissions unit other than landfill gas and/or natural gas.
- (2) During the operation of this emissions unit for the use of landfill gas as a supplemental fuel, the permittee shall have and be able to present during normal business hours a



certificate from the landfill gas provider verifying that landfill gas fuel provided to the permittee is treated as required in the Standards of Performance for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW).

Further, no later than 15 calendar days prior to the compliance date for any applicable updates or changes to treatment required in 40 CFR Part 60, Subpart WWW, the landfill gas provider shall issue a certificate documenting that the landfill gas used by the permittee is treated in accordance with the new requirements. The permittee shall keep and maintain the treatment certification for the life of this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or treated (including any updates to the definitions of treatment) landfill gas was burned in this emissions unit and the amount of the fuel.
- (2) The permittee shall notify the Northeast District Office of the Ohio EPA, in writing, within 45 days of receiving notice from the landfill gas provider that untreated landfill gas, as defined and regulated under Standards of Performance for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW), was provided to the permittee. The written notice shall document the time period when untreated landfill gas was supplied to the permittee and include an estimate of the quantity of untreated landfill gas received from the landfill gas provider.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations and operational restriction in b)(1) and c)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.
 - b. Emission Limitation:

PE shall not exceed 0.02 pound per mmBtu of actual heat input.



Applicable Compliance Method:

The potential to emit of this emissions unit is less than the PE emission limit and therefore demonstrates compliance with this requirement.

c. Operational Restriction:

The permittee shall burn only treated landfill gas, and/or natural gas in this emissions unit. For purposes of this term, treated landfill gas shall mean landfill gas that passes through a treatment system that is designed and operated to meet the requirements of the NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) and which meets the definition of a treatment system as described in the December 28, 2005 USEPA Applicability Determination letter from Judith M. Katz along with any USEPA updates to this definition.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) and d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.



3. Emissions Unit Group - Burnham Steam Boilers 1 and 2: B013 and B014, w/landfill gas usage as backup

Operations, Property and/or Equipment Description:

B013 #1 NG Burnham Steam Boiler rated at 8.369 mmBtu/hr; use of landfill gas as backup fuel

B014 #2 NG Burnham Steam Boiler rated at 8.369 mmBtu/hr; use of landfill gas as backup fuel

All terms and conditions apply to each of B013 and B014

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. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	See b)(2)b below.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.02 pound per mmBtu of actual heat input. See b)(2)d below.



(2) Additional Terms and Conditions

- a. This is a Permit to Install and Operate (PTIO) for the modification of existing 8.369 mmBtu/hr Burnham Steam Boilers numbers 1 and 2 (Ohio EPA emissions units B013 and B014) to burn landfill derived methane gas along with the existing fuel, natural gas, or use of natural gas only.
- b. The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to sulfur dioxide (SO₂), hydrochloric acid (HCL), nitrogen oxides (NO_x), volatile organic compounds (VOC) and carbon monoxide (CO) emissions, and particulate emissions (PE) from this air contaminant source(s), since the calculated annual uncontrolled emission rates per emissions unit, based on AP-42, Chapters/Sections 1.4 and 2.4 and previous stack tests are less than 10 tons per year. Following are the maximum annual emissions:
 - SO₂ 0.25 ton per year;
 - HCL 0.18 ton per year;
 - NO_x 3.60 tons per year;
 - VOC 4.70 tons per year;
 - CO 3.10 tons per year; and
 - PE 0.70 ton per year.
- c. The calculated PE potential to emit for this emissions unit is less than the emission limitation in b)(1) of this permit. Therefore, no monitoring, record keeping, reporting or testing is required to demonstrate compliance with this emission limitation.
- d. The permittee shall tune this fuel burning equipment yearly or follow the most recent recommendation from the vendor.

c) Operational Restrictions

- (1) The permittee shall burn only treated landfill gas, and/or natural gas in this emissions unit. For purposes of this term, treated landfill gas shall mean landfill gas that passes through a treatment system that is designed and operated to meet the requirements of the NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) and which meets the definition of a treatment system as described in the December 28, 2005 USEPA Applicability Determination letter from Judith M. Katz along with any USEPA updates to this definition.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall record and maintain daily fuel combustion records of each fuel combusted during each day and a record of the type and quantity of any fuel burned in this emissions unit other than landfill gas and/or natural gas.
- (2) During the operation of this emissions unit for the use of landfill gas as a supplemental fuel, the permittee shall have and be able to present during normal business hours a



certificate from the landfill gas provider verifying that landfill gas fuel provided to the permittee is treated as required in the Standards of Performance for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW).

Further, no later than 15 calendar days prior to the compliance date for any applicable updates or changes to treatment required in 40 CFR Part 60, Subpart WWW, the landfill gas provider shall issue a certificate documenting that the landfill gas used by the permittee is treated in accordance with the new requirements. The permittee shall keep and maintain the treatment certification for the life of this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or treated (including any updates to the definitions of treatment) landfill gas was burned in this emissions unit and the amount of the fuel.
- (2) The permittee shall notify the Northeast District Office of the Ohio EPA, in writing, within 45 days of receiving notice from the landfill gas provider that untreated landfill gas, as defined and regulated under Standards of Performance for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW), was provided to the permittee. The written notice shall document the time period when untreated landfill gas was supplied to the permittee and include an estimate of the quantity of untreated landfill gas received from the landfill gas provider.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations and operational restriction in b)(1) and c)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.
 - b. Emission Limitation:

PE shall not exceed 0.02 pound per mmBtu of actual heat input.



Applicable Compliance Method:

The potential to emit of this emissions unit is less than the PE emission limit and therefore demonstrates compliance with this requirement.

c. Operational Restriction:

The permittee shall burn only treated landfill gas, and/or natural gas in this emissions unit. For purposes of this term, treated landfill gas shall mean landfill gas that passes through a treatment system that is designed and operated to meet the requirements of the NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) and which meets the definition of a treatment system as described in the December 28, 2005 USEPA Applicability Determination letter from Judith M. Katz along with any USEPA updates to this definition.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) and d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.



4. B015, 9.97 MMBTU/hr SFA Fulton Hot Oil Heater with landfill gas fuel as backup

Operations, Property and/or Equipment Description:

9.97 mmBtu/hr SFA Fulton Heater modified to burn landfill derived methane gas as backup

- 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. None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations(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. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	See b)(2)b below.
b.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.02 pound per mmBtu of actual heat input. See b)(2)d below.

- (2) Additional Terms and Conditions
 - a. This is a Permit to Install and Operate (PTIO) for the modification of an existing SFA Fulton Hot Oil Heater (Ohio EPA emissions unit B015) to burn landfill derived methane gas along with the existing fuel, natural gas, or use of natural gas only.



b. The Best Available Technology requirements under OAC rule 3745-31-05(A)(3) do not apply to sulfur dioxide (SO₂), hydrochloric acid (HCl), nitrogen oxides (NO_x), volatile organic compounds (VOC) and carbon monoxide (CO) emissions, and particulate emissions (PE) from this air contaminant source(s), since the calculated annual uncontrolled emission rates per emissions unit, based on AP-42, Chapters/Sections 1.4 and 2.4 and previous stack tests are less than 10 tons per year. Following are the maximum annual emissions:

SO ₂	0.30 ton per year;
HCl	0.21 ton per year;
NO _x	4.30 tons per year;
VOC	5.50 tons per year; and
CO	3.60 tons per year.

c. The calculated PE potential to emit for this emissions unit is less than the emission limitation in b)(1) of this permit. Therefore, no monitoring, record keeping, reporting or testing is required to demonstrate compliance with this emission limitation.

d. The permittee shall tune this fuel burning equipment yearly or follow the most recent recommendation from the vendor.

c) Operational Restrictions

(1) The permittee shall burn only treated landfill gas, and/or natural gas in this emissions unit. For purposes of this term, treated landfill gas shall mean landfill gas that passes through a treatment system that is designed and operated to meet the requirements of the NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) and which meets the definition of a treatment system as described in the December 28, 2005 USEPA Applicability Determination letter from Judith M. Katz along with any USEPA updates to this definition.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall record and maintain daily fuel combustion records of each fuel combusted during each day and a record of the type and quantity of any fuel burned in this emissions unit other than landfill gas and/or natural gas.

(2) During the operation of this emissions unit for the use of landfill gas as a supplemental fuel, the permittee shall have and be able to present during normal business hours a certificate from the landfill gas provider verifying that landfill gas fuel provided to the permittee is treated as required in the Standards of Performance for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW).

Further, no later than 15 calendar days prior to the compliance date for any applicable updates or changes to treatment required in (40 CFR Part 60, Subpart WWW), the landfill gas provider shall issue a certificate documenting that the landfill gas used by the



permittee is treated in accordance with the new requirements. The permittee shall keep and maintain the treatment certification for the life of this emissions unit.

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or treated (including any updates to the definitions of treatment) landfill gas was burned in this emissions unit and the amount of the fuel.
- (2) The permittee shall notify the Northeast District Office of the Ohio EPA, in writing, within 45 days of receiving notice from the landfill gas provider that untreated landfill gas, as defined and regulated under Standards of Performance for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW), was provided to the permittee. The written notice shall document the time period when untreated landfill gas was supplied to the permittee and include an estimate of the quantity of untreated landfill gas received from the landfill gas provider.
- (3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the Director by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12 months for each air contaminant source identified in this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations and operational restriction in b)(1) and c)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

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

b. Emission Limitation:

PE shall not exceed 0.02 pound per mmBtu of actual heat input.

Applicable Compliance Method:

The potential to emit of this emissions unit is less than the PE emission limit and therefore demonstrates compliance with this requirement.



c. Operational Restriction:

The permittee shall burn only treated landfill gas, and/or natural gas in this emissions unit. For purposes of this term, treated landfill gas shall mean landfill gas that passes through a treatment system that is designed and operated to meet the requirements of the NSPS for Municipal Solid Waste Landfills (40 CFR Part 60, Subpart WWW) and which meets the definition of a treatment system as described in the December 28, 2005 USEPA Applicability Determination letter from Judith M. Katz along with any USEPA updates to this definition.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the record keeping requirements specified in d)(1) and d)(2) of this permit.

g) Miscellaneous Requirements

(1) None.