



State of Ohio Environmental Protection Agency

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

6/16/2009

John Bonner
Eagle Creek Wholesale
10151 Asbury Rd
Mantua, OH 44255

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1667050045
Permit Number: P0105036
Permit Type: Renewal
County: Portage

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 Akron Regional Air Quality Management District. 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: ARAQMD

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
Eagle Creek Wholesale

Facility ID: 1667050045
Permit Number: P0105036
Permit Type: Renewal
Issued: 6/16/2009
Effective: 6/16/2009
Expiration: 6/16/2019



Air Pollution Permit-to-Install and Operate
for
Eagle Creek Wholesale

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. B001, Wood Waste Boiler..... 11



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate
Permit Number: P0105036
Facility ID: 1667050045
Effective Date: 6/16/2009

Authorization

Facility ID: 1667050045
Application Number(s): A0037779
Permit Number: P0105036
Permit Description: Renewal air permit for wood waste burner.
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 6/16/2009
Effective Date: 6/16/2009
Expiration Date: 6/16/2019
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Eagle Creek Wholesale
10151 Asbury Rd
Mantua, OH 44255

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:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Final Permit-to-Install and Operate

Permit Number: P0105036

Facility ID: 1667050045

Effective Date: 6/16/2009

Authorization (continued)

Permit Number: P0105036

Permit Description: Renewal air permit for wood waste burner.

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

Emissions Unit ID:	B001
Company Equipment ID:	Wood Waste 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: P0105036

Facility ID: 1667050045

Effective Date: 6/16/2009

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 Akron Regional Air Quality Management District 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: P0105036

Facility ID: 1667050045

Effective Date: 6/16/2009

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: P0105036

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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: P0105036

Facility ID: 1667050045

Effective Date: 6/16/2009

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: P0105036

Facility ID: 1667050045

Effective Date: 6/16/2009

C. Emissions Unit Terms and Conditions



1. B001, Wood Waste Boiler

Operations, Property and/or Equipment Description:

Hurst Boiler & Welding Company: 10.04 million Btu per hour rated heat input capacity; and 10,350 pounds of steam per hour, 300 horsepower & 30 psig hot water pressure rated output capacities. PTI 16-02460, issued final August 29, 2006, allowed burning wood and corn. PTI 16-02484, issued final May 3, 2007, superseded PTI 16-02460 to also allow burning a mixture of wood and tire derived fuel (TDF). Emissions of 10-micrometer particulate matter (PM₁₀) and particulate emissions (PE) controlled by a multicyclone (mechanical collector). Emissions of nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), volatile organic compounds (VOC), and hazardous air pollutants (HAP) are uncontrolled. This permit replaces PTI 16-02484.

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)	Stack emissions shall not exceed the following limits* (tons/year limits based on 6570 hours/year operating schedule): 0.27 lb PM ₁₀ /mmBtu heat input; 8.9 tons/year PM ₁₀ and 13 tons/year PE; 0.030 lb VOC/mmBtu heat input; 0.99 ton/year VOC; 0.025 lb SO ₂ /mmBtu heat input; 0.82 ton/year SO ₂ ; 0.49 lb NO _x /mmBtu heat input; 16 tons/year NO _x ; 0.60 lb CO/mmBtu heat input; and



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>20 tons/year CO.</p> <p>*See b)(2)c below.</p> <p>The fuel burned in this emissions unit shall be properly stored and handled to minimize emissions of fugitive dust.</p> <p>The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-17-10(C)(1).</p>
b.	OAC rule 3745-17-07(A)	Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
c.	OAC rule 3745-17-07(B)(11)(e) OAC rule 3745-17-08(A)(1)	This facility is not located in an "Appendix A" area as described in OAC rule 3745-17-08; therefore, OAC rules 3745-17-07(B)(1) and 3745-17-08(B) do not apply to this emissions unit.
d.	OAC rule 3745-17-10(C)(1)	PE shall not exceed 0.4 lb/mmBtu heat input (based on "Curve P-1" of "Figure I").
e.	OAC rule 3745-18-83(A)(1)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
f.	ORC 3704.03(F)(3)(c) and F(4) OAC rule 3745-114-01	See g)(1).

(2) Additional Terms and Conditions

- a. The permittee shall apply for and, if required, obtain a modification to this permit or obtain a new final permit-to-install and operate (PTIO) prior to making any change to equipment, change in fuels burned, change in the method of operation, or any other change of this emissions unit that results in an increase in the allowable emissions or results in an increase in emissions of greater than the de minimis levels in OAC rule 3745-15-05 of any type of air contaminant not previously emitted.
- b. The permittee shall properly install (or have properly installed), adjust, operate, and maintain a multicyclone (or comparable air pollution control device), associated control equipment, and any other equipment necessary to capture, contain, and vent particulate emissions to the air pollution control device serving this emissions unit, in accordance with the manufacturer's recommendations, instructions, and operating manuals, and to the extent possible with good engineering design.



- c. The permittee shall conduct emissions testing, in accordance with the testing requirements of Section f)(2) below, to establish site-specific potential emissions from this emissions unit. If necessary, some or all of the emissions limits established pursuant to OAC rule 3745-31-05(A)(3) of this permit shall be modified during the issuance of subsequent air permits to represent the potential emissions from the emissions unit.

If results from the emissions testing indicate the emissions unit is a major source of any applicable air pollutant, the facility may need to apply for voluntary operational restrictions to limit potential emissions below major source emissions thresholds in order to avoid major new source review and/or Title V program requirements.

To help determine if Ohio's "Air Toxic Policy" is satisfied, additional emissions testing using appropriate US EPA test methods may be required by Ohio EPA to quantify emissions of select individual toxic pollutants (e.g., benzene), likely to be emitted in excess of 1.0 tons per year, for use in air dispersion computer modeling.

c) Operational Restrictions

- (1) The permittee shall operate the emissions unit no more than 6570 hours per calendar year. This operating hours restriction was requested by the facility to limit annual stack emissions below all "OHIO MODELING SIGNIFICANT EMISSION RATE" thresholds to avoid air dispersion computer modeling requirements.
- (2) The permittee shall burn only wood and corn in this emissions unit, as specified in the application, i.e., Wood: 1-1/2 x 1-1/2 x 5/8 inches or less in size @ 20% maximum moisture content, 5422 Btu/lb minimum heat content, and 0.43% maximum ash content; and Corn: @ 15% maximum moisture content, 7000 Btu/lb minimum heat content, and 5% maximum ash content. Wood, as specified above, shall be burned in this emissions unit as the primary fuel; and corn, as specified above, shall be burned in this emissions unit as a backup fuel. The wood and corn burned in this emissions unit shall be dry and clean, free from foreign matter contamination, such as oils, solvents, plastic, etc. For example, shredded wooden pallets shall not contain any plastic shrink wrappings or leakage/spillage of stored materials. The permittee shall not burn wood or wood waste derived from any operation which coats, treats, or otherwise contaminates the wood or wood waste. Trees, cut and chipped to size, may be burned, provided this wood material is sufficiently dry, contains only inherent quantities of bark, and meets the wood criteria specified above. Bark, exclusively, shall not be burned in this emissions unit.
- (3) A mixture of wood, as specified above in c)(2), and TDF may be burned in this emissions unit as a backup fuel. The maximum percentage of TDF in the wood/TDF mixture, as well as the maximum rate at which the wood/TDF mixture can be burned, shall be established and used during the most recent emissions testing that demonstrated the emissions unit was in compliance with applicable emissions limitations. TDF burned in the emissions unit shall be shredded to size, with dimensions of tire pieces typically no greater than 2 x 2 inches. TDF burned in the emissions unit shall have a 15,000 Btu/lb minimum heat content, 1.2% maximum sulfur content, and 5% maximum ash content. TDF shall never be burned solely and never with any other material, except as specified above.



- (4) No materials shall be burned in this emissions unit, except as specified above in c)(2) and c)(3). Under no circumstances shall this emissions unit be used as an incinerator, as defined by OAC rule 3745-17-01(B)(9).
 - (5) The permittee shall employ the multicyclone and associated air pollution control equipment serving this emissions unit at all times the emissions unit is in operation. Ohio EPA may require the permittee to upgrade to a more efficient PE control technology if the multicyclone does not demonstrate compliance with applicable emissions limits of this permit.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain daily records of the operating hours of this emissions unit, and use these records to determine the annual operating hours.
 - (2) The permittee shall maintain daily records which identify each day when a fuel that does not meet the requirements of section c)(2) and/or c)(3) of these terms and conditions was burned in this emissions unit.
 - (3) The permittee shall document when the multicyclone and/or associated air pollution control equipment serving this emissions unit were/was not in service when the emissions unit was in operation.
 - (4) The permittee shall perform daily checks, when the emissions unit is in operation and when weather conditions allow, for any visible PE from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.
- e) Reporting Requirements
- (1) 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 twelve months for each air contaminant source identified in this permit.
 - (2) The permittee shall identify the following information in the annual PER in accordance with the monitoring requirements for visible emissions in term number d)(4) above:



- a. all days during which any visible PE were observed from the stack serving this emissions unit; and
- b. any corrective actions taken to minimize or eliminate the visible PE.

f) Testing Requirements

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

- a. Emission Limitations: 0.27 lb PM₁₀/mmBtu heat input & 8.9 tons/year PM₁₀ (stack emissions)

Applicable Compliance Method: The 0.27 lb PM₁₀/mmBtu heat input emission limitation is the potential to emit based on AP-42, 9/03, Table 1.6-1, dry wood burned, controlled by mechanical collector (multicyclone):

$$Y = (0.27 \text{ lb PM}_{10}/\text{mmBtu}) * P * T * (1 \text{ ton}/2000 \text{ lbs});$$

Where:

Y = 8.9 tons/year PM₁₀ [yearly emissions based on 6570 hours/year operating schedule];

P = 10 mmBtu/hr [maximum rated heat input of emissions unit]; and

T = 6570 hours/year [facility-requested restricted operating schedule].

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with 40 CFR Part 51, Appendix M, Method 201/201A.

When burning a mixture of wood and TDF, as specified above, compliance shall be demonstrated per the emissions testing requirements specified below in Section f)(2).

- b. Emission Limitations: 0.4 lb PE/mmBtu heat input & 13 tons/year PE (stack emissions)

Applicable Compliance Method: The 13 tons/year PE emission limitation is based on the OAC rule 3745-17-10(C)(1) allowable emission rate of 0.4 lb PE/mmBtu heat input:

$$Y = (0.4 \text{ lb PE}/\text{mmBtu}) * P * T * (1 \text{ ton}/2000 \text{ lbs});$$

Where:

Y = 13 tons/year PE [yearly emissions based on 6570 hours/year operating schedule];

P = 10 mmBtu/hr [maximum rated heat input of emissions unit]; and

T = 6570 hours/year [facility-requested restricted operating schedule].



If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 5.

When burning a mixture of wood and TDF, as specified above, compliance shall be demonstrated per the emissions testing requirements specified below in Section f)(2).

- c. Emission Limitations: 0.49 lb NO_x/mmBtu heat input & 16 tons/year NO_x (stack emissions)

Applicable Compliance Method: The 0.49 lb NO_x/mmBtu heat input emission limitation is the potential to emit based on AP-42, 9/03, Table 1.6-2, dry wood burned:

$$Y = (0.49 \text{ lb NO}_x/\text{mmBtu}) * P * T * (1 \text{ ton}/2000 \text{ lbs});$$

Where:

Y = 16 tons/year NO_x [yearly emissions based on 6570 hours/year operating schedule];
P = 10 mmBtu/hr [maximum rated heat input of emissions unit]; and
T = 6570 hours/year [facility-requested restricted operating schedule].

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 4, 7E.

When burning a mixture of wood and TDF, as specified above, compliance shall be demonstrated per the emissions testing requirements specified below in Section f)(2).

- d. Emission Limitations: 0.60 lb CO/mmBtu heat input & 20 tons/year CO (stack emissions)

Applicable Compliance Method: The 0.60 lb CO/mmBtu heat input emission limitation is the potential to emit based on AP-42, 9/03, Table 1.6-2, dry wood burned:

$$Y = (0.60 \text{ lb CO}/\text{mmBtu}) * P * T * (1 \text{ ton}/2000 \text{ lbs});$$

Where:

Y = 20 tons/year CO [yearly emissions based on 6570 hours/year operating schedule];
P = 10 mmBtu/hr [maximum rated heat input of emissions unit]; and
T = 6570 hours/year [facility-requested restricted operating schedule].

If required, the permittee shall demonstrate compliance based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 4, 10.



When burning a mixture of wood and TDF, as specified above, compliance shall be demonstrated per the emissions testing requirements specified below in Section f)(2).

- e. Emission Limitation: Visible PE from the stack shall not exceed 20% opacity, as a 6-minute average (stack emissions)

Applicable Compliance Method: Compliance with the visible PE shall be demonstrated in accordance with Method 9 of 40 CFR Part 60, Appendix A.

- f. Emission Limitations: 0.025 lb/mmBtu heat input & 0.82 ton/year SO₂ (stack emissions)

Applicable Compliance Method: When burning a mixture of wood and TDF, as specified above, compliance shall be demonstrated per the emissions testing requirements specified below in Section f)(2).

- g. Emission Limitations: 0.030 lb/mmBtu heat input & 0.99 ton/year VOC (stack emissions)

Applicable Compliance Method: When burning a mixture of wood and TDF, as specified above, compliance shall be demonstrated per the emissions testing requirements specified below in Section f)(2).

- (2) The permittee shall conduct, or have conducted, emissions testing for this emissions unit in accordance with the following requirements:

- a. Emissions testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after modification of the emissions unit to burn a mixture of wood and TDF, as specified in Sections c)(2) and c)(3) of this permit.
- b. Emissions testing shall be conducted to demonstrate compliance with the allowable mass emissions rate(s) for PE, PM₁₀, SO₂, NO_x, CO, and VOC, while burning a mixture of wood and TDF, as specified in this permit, in the appropriate averaging period(s).
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emissions rate(s):

PE	Method 5	40 <u>CFR</u> Part 60, Appendix A
PM ₁₀	Method 201/201A	40 <u>CFR</u> Part 51, Appendix M
SO ₂	Method 6	40 <u>CFR</u> Part 60, Appendix A
NO _x	Method 7E	40 <u>CFR</u> Part 60, Appendix A
CO	Method 10	40 <u>CFR</u> Part 60, Appendix A
VOC	Method 25/25A	40 <u>CFR</u> Part 60, Appendix A.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, i.e., the maximum percentage, on a weight basis, of TDF in the wood/TDF mixture, at the maximum process weight rate for the mixture, in pounds per hour, that can be burned stoichiometrically, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
- f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with the AToxic Air Contaminant Statute², ORC 3704.03(F)(4)(b) was not necessary because, based on the application, the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit-to-install and operate (PTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new PTIO.
- (2) This permit replaces and supersedes all of the requirements of PTI 16-02484, issued final May 3, 2007.