



State of Ohio Environmental Protection Agency

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Columbus, OH 43216-1049

7/17/2009

Tom Amedro  
FRANKLIN BOXBOARD CORPORATION  
50 East 6th St  
Franklin, OH 45005

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1483040008  
Permit Number: P0104600  
Permit Type: Renewal  
County: Warren

Certified Mail

No	TOXIC REVIEW
No	PSD
Yes	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](http://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 Hamilton County Dept. of Environmental Services. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page [www.epa.state.oh.us/dapc](http://www.epa.state.oh.us/dapc).

Sincerely,

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

Cc: HCDOES

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  
FRANKLIN BOXBOARD CORPORATION**

Facility ID: 1483040008  
Permit Number: P0104600  
Permit Type: Renewal  
Issued: 7/17/2009  
Effective: 7/17/2009  
Expiration: 7/17/2014





**Air Pollution Permit-to-Install and Operate**  
for  
**FRANKLIN BOXBOARD CORPORATION**

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Division of Air Pollution Control

**Final Permit-to-Install and Operate**  
**Permit Number:** P0104600  
**Facility ID:** 1483040008  
**Effective Date:** 7/17/2009

# Authorization

Facility ID: 1483040008  
Application Number(s): A0036846  
Permit Number: P0104600  
Permit Description: Renewal of FEPTIO for B001, gas/oil boiler, to avoid Title V.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 7/17/2009  
Effective Date: 7/17/2009  
Expiration Date: 7/17/2014  
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

FRANKLIN BOXBOARD CORPORATION  
50 EAST SIXTH ST  
FRANKLIN, OH 45005

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:

Hamilton County Dept. of Environmental Services  
250 William Howard Taft Pkwy.  
Cincinnati, OH 45219-2660  
(513)946-7777

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:** P0104600

**Facility ID:** 1483040008

**Effective Date:** 7/17/2009

## Authorization (continued)

Permit Number: P0104600

Permit Description: Renewal of FEPTIO for B001, gas/oil boiler, to avoid Title V.

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

<b>Emissions Unit ID:</b>	<b>B001</b>
Company Equipment ID:	Derated 78 mmBtu/hr Gas/Oil Boiler
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



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**Final Permit-to-Install and Operate**

**Permit Number:** P0104600

**Facility ID:** 1483040008

**Effective Date:** 7/17/2009

## **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 Hamilton County Dept. of Environmental Services 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



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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.



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Division of Air Pollution Control

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## **B. Facility-Wide Terms and Conditions**



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

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**Permit Number:** P0104600

**Facility ID:** 1483040008

**Effective Date:** 7/17/2009

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**

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**Effective Date:** 7/17/2009

## **C. Emissions Unit Terms and Conditions**



**1. B001, Derated 78 mmBtu/hr Gas/Oil Boiler**

**Operations, Property and/or Equipment Description:**

Derated 78 MMBtu/hr industrial boiler for process heat firing natural gas as a primary fuel and #6 fuel oil as a backup fuel

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. See b)(1)a.

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(D) Synthetic Minor for SO <sub>2</sub> and NO <sub>x</sub> to avoid Title V	The sulfur dioxide (SO <sub>2</sub> ) emissions from this emissions unit shall not exceed 98.27 tons per year (TPY), based on a rolling, 12-month summation from natural gas and No. 6 fuel oil combustion.  The nitrogen oxides (NO <sub>x</sub> ) emissions from this emissions unit shall not exceed 57.99 TPY based on a rolling, 12-month summation from natural gas and No. 6 fuel oil combustion.  See b)(2)a., b)(2)b., b)(2)c., b)(2)d., b)(2)e., d)(1), c)(1), d)(2), d)(3), d)(5), and e)(3).
b.	OAC rule 3745-15-03(D)	See e)(1) and e)(2).
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		rule.
d.	OAC rule 3745-17-10(B)(1)	The particulate emissions (PE) from this emissions unit shall not exceed 0.020 pound per MMBtu of actual heat input when firing natural gas, or any other gaseous fuels, and/or No. 2 fuel oil.
e.	OAC rule 3745-17-10(C)(1)	The PE from this emissions unit shall not exceed 0.22 pound per MMBtu of actual heat input when firing No. 6 fuel oil as specified by "Curve P1" of "Figure I" in the appendix to OAC rule 3745-17-10.
f.	OAC rule 3745-18-06(D)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
g.	OAC rule 3745-21-08	See b)(2)f.

(2) Additional Terms and Conditions

- a. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the SO<sub>2</sub> and NO<sub>x</sub> emissions upon issuance of this permit.
- b. The SO<sub>2</sub> emissions from this emissions unit shall not exceed 1.05 pounds per MMBtu of actual heat input when firing oil. This emissions unit is exempt from this requirement during any calendar day in which natural gas is the only fuel burned.
- c. The maximum annual No. 6 fuel oil usage for this emissions unit shall not exceed 1,250 thousand gallons, based upon a rolling, 12-month summation of the No. 6 fuel oil usage. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the gallons of No. 6 fuel oil usage restriction upon issuance of this permit.
- d. The quality of the oil burned in this emissions unit shall meet the following specifications on an as burned basis:
  - i. a sulfur content and density which is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.05 pounds of SO<sub>2</sub>/MMBtu actual heat input when firing oil; and
  - ii. greater than 150,000 Btu/gallon of oil.

Compliance with the above-mentioned specifications shall be determined by using the oil supplier's analyses for sulfur content and heat content.
- e. The daily average operating rate for this emissions unit shall not exceed 78 MMBtu/hr.



- (3) The design of the emissions unit and the technology associated with the current operating practices satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. On June 24, 2003, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, until the U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

c) Operational Restrictions

- (1) The maximum annual natural gas usage for this emissions unit shall not exceed 472.2 million (MM) cubic feet (cf), based upon a rolling, 12-month summation of the natural gas usage. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the natural gas usage restriction upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. the No. 6 fuel oil usage rate for each month, in thousands of gallons;
  - b. the natural gas usage rate for each month, in millions of cubic feet;
  - c. the rolling, 12-month summation of the No. 6 fuel oil usage; and
  - d. the rolling, 12-month summation of the natural gas usage.
- (2) The permittee shall maintain monthly records of the following information:
  - a. the SO<sub>2</sub> and NO<sub>x</sub> emission rates, in tons, for each month of operations as a summation of the emissions, based upon a 12-month period, from the use of No. 6 fuel oil and natural gas as calculated below using emission factors (EF) from AP-42, Fifth Edition, Volume I, Chapters 1.3 (1998, 2000) and 1.4 (1998):
    - i. the actual quantity of No. 6 fuel oil used, recorded in d)(1)a., thousands of gallons/month, multiplied by 157(S) pounds SO<sub>2</sub>/thousand gallons of No. 6 fuel oil used\*, multiplied by 1 Ton/2000 pounds;
    - ii. the actual quantity of No. 6 fuel oil used, recorded in d)(1)a., thousands of gallons/month, multiplied by 55 pounds NO<sub>x</sub>/thousand gallons of No. 6 fuel oil used, multiplied by 1 Ton/2000 pounds;
    - iii. the actual quantity of natural gas used, recorded in d)(1)b., millions of cubic feet, multiplied by 0.6 pound of SO<sub>2</sub>/million cubic feet of natural gas used, multiplied by 1 Ton/2000 pounds; and
    - iv. the actual quantity of natural gas used, recorded in d)(1)b., millions of cubic feet, multiplied by 100 pounds of NO<sub>x</sub>/million cubic feet of natural gas used, multiplied by 1 Ton/2000 pounds.



\*Where S = weight percent sulfur in the No. 6 fuel oil (%)

- (3) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the fuel oil type (number 2, 4, or 6), the permittee's or oil supplier's analyses for sulfur content, heat content, and density, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

- (4) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions 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.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (5) The permittee shall maintain daily records of the daily average operating rate, in MMBtu/hr, for this emissions unit.



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 permit evaluation report 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 particulate emissions were observed from the stack serving this emissions unit; and
  - b. any corrective actions taken to minimize or eliminate the visible particulate emissions.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. all exceedances of the rolling, 12-month No. 6 fuel oil usage limitation, 1,250 thousand gallons;
    - ii. all exceedances of the rolling, 12-month natural gas usage limitation, 472.2 million (MM) cubic feet (cf);
    - iii. all exceedances of the rolling, 12-month SO<sub>2</sub> and/or NO<sub>x</sub> emissions limitations of 98.27 TPY and 57.99 TPY, respectively;
    - iv. any exceedance of the allowable sulfur dioxide emission limitation, 1.05 pounds sulfur dioxide/MMBtu actual heat input when firing oil;
    - v. any deviation from the minimum heat content limitation on the No. 6 fuel oil, 150,000 Btu/gallon; and
    - vi. all exceedances of the operating rate limitation, 78 MMBtu/hr.
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.



The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

(1) Compliance with the emission limitations in b) of these terms and conditions shall be determined in accordance with the following method(s) identified below:

a. Emission Limitations:

The sulfur dioxide (SO<sub>2</sub>) emissions from this emissions unit shall not exceed 98.27 tons per year (TPY), based on a rolling, 12-month summation from natural gas and No. 6 fuel oil combustion.

The nitrogen oxides (NO<sub>x</sub>) emissions from this emissions unit shall not exceed 57.99 TPY based on a rolling, 12-month summation from natural gas and No. 6 fuel oil combustion.

Applicable Compliance Method:

Compliance with the rolling, 12-month SO<sub>2</sub> and NO<sub>x</sub> emission limitations shall be demonstrated by the recordkeeping requirement outlined in d)(2).

The rolling, 12-month SO<sub>2</sub> and NO<sub>x</sub> emission limitations were established using information provided by the permittee in PTIO application A0036846 for FEPTIO number P0104600 in the following equations:

$$\begin{aligned}
 &1,250 \text{ thous gal oil/yr} \times 157(1) \text{ lbs SO}_2/\text{thous gal oil} \times \text{Ton}/2000 \text{ lbs} = 98.13 \text{ TPY SO}_2 \\
 &472.2 \text{ MMcf gas/yr} \times 0.6 \text{ lb SO}_2/\text{MMcf gas} \times \text{Ton}/2000 \text{ lbs} = \frac{0.14 \text{ TPY SO}_2}{98.27 \text{ TPY SO}_2}
 \end{aligned}$$

$$\begin{aligned}
 &1,250 \text{ thous gal oil /yr} \times 55 \text{ lbs NO}_x/\text{thous gal} \times \text{Ton}/2000 \text{ lbs} = 34.38 \text{ TPY NO}_x \\
 &472.2 \text{ MMcf gas/yr} \times 100 \text{ lbs NO}_x/\text{MMcf gas} \times \text{Ton}/2000 \text{ lbs} = \frac{23.61 \text{ TPY NO}_x}{57.99 \text{ TPY NO}_x}
 \end{aligned}$$

b. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.



c. Emission Limitation:

The particulate emissions (PE) from this emissions unit shall not exceed 0.020 pound per MMBtu of actual heat input when firing natural gas, or any other gaseous fuels, and/or No. 2 fuel oil.

Applicable Compliance Method:

If required, compliance shall be demonstrated by conducting Method 5 emission testing pursuant to 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

Compliance with the SIP allowable PE limitation shall be demonstrated by the AP-42 emission factor, in Table 1.4-2 of 7/98 version, of 7.6 lbs of PM/MMCf of gas in the following equation:

$$7.6 \text{ lbs of PM (total)/MMcf of gas} \times 1 \text{ MMcf of gas/1020 MMBtu} = 0.00745 \text{ lb of PE/MMbtu.}$$

d. Emission Limitation:

The PE from this emissions unit shall not exceed 0.22 pound per MMBtu of actual heat input when firing No. 6 fuel oil as specified by "Curve P1" of "Figure I" in OAC rule 3745-17-10.

Applicable Compliance Method:

If required, compliance shall be demonstrated by conducting Method 5 emissions testing pursuant to 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

Compliance with the SIP allowable PE limitation shall be demonstrated by the AP-42 emission factors of 10 lbs of PM/thousand gallons of No. 6 oil from Table 1.3-1 of 9/98 version + 1.5 lbs of CPM-TOT/thousand gallons of No. 6 oil from Table 1.3-2 of 9/98 version in the following equation:

$$11.5 \text{ lbs of PM (total)/thousand gallons of fuel oil} \times \text{thousand gallons of fuel oil/150 MMBtu} = 0.009 \text{ lb of PE/MMbtu.}$$

The PE limitation was established pursuant to the calculation under Curve P1 of Figure I in OAC rule 3745-17-10:

$$E = 0.8(H)^{-0.3010}; E = 0.8(78)^{-0.3010} = 0.22 \text{ lb of PE/MMBtu}$$

Where:

E = pounds of emissions per million Btu actual heat input; and

H = total heat input, millions of Btu per hour.



e. Emission Limitation:

The sulfur dioxide (SO<sub>2</sub>) emissions from this emissions unit shall not exceed 1.05 pounds per MMBtu of actual heat input when firing oil.

Applicable Compliance Method

Compliance with the allowable SO<sub>2</sub> emission limitation shall be demonstrated by the recordkeeping requirement outlined in d)(3) for the permittee's or oil supplier's analyses for sulfur content and heat content. The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)(2):

$$ER = (1 \times 10^6)/H \times D \times S \times 1.974$$

Where:

- ER = the emission rate in pounds of sulfur dioxide per MMBtu
- H = the heat content of the liquid fuel in Btu per gallon
- D = the density of the liquid fuel in pounds per gallon
- S = the decimal fraction of sulfur in the liquid fuel

$$ER = (1 \times 10^6)/150,000 \times 7.82 \times 0.01 \times 1.974 = 1.03 \text{ lbs of SO}_2/\text{MMBtu.}$$

The SO<sub>2</sub> emission limitation was established pursuant to the following calculation using the AP 42 emission factor from Table 1.3-1, 9/98 version (sulfur content of 1 percent) in the following calculation:

$$157(1) \text{ lbs SO}_2/\text{thous gal oil} \times \text{thous gal oil}/150 \text{ MMBtu} = 1.05 \text{ lbs SO}_2/\text{MMBtu.}$$

g) Miscellaneous Requirements

- (1) None.