State of Ohio Environmental Protection Agency

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

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

8/18/2009

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Michael Kuntz
ADM-Fostoria
608 Findlay Road
Fostoria, OH 44830

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0332020187
Permit Number: P0105171
Permit Type: OAC Chapter 3745-31 Modification
County: Hancock

Dear Permit Holder:

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

The issuance of this PTI 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

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.state.oh.us/dapc.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA DAPC, Northwest District Office

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Air Pollution Permit-to-Install
for
ADM-Fostoria

Facility ID: 0332020187
Permit Number: P0105171
Permit Type: OAC Chapter 3745-31 Modification
Issued: 8/18/2009
Effective: 8/18/2009

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install
for
ADM-Fostoria

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Authorization

Facility ID: 0332020187
Facility Description: Soybean Oil Mill
Application Number(s): A0037826
Permit Number: P0105171
Permit Description: Boiler #2 - change fuel firing provisions
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: $400.00
Issue Date: 8/18/2009
Effective Date: 8/18/2009

This document constitutes issuance to:

ADM-Fostoria
608 Findlay Road
P.O. Box 110
Fostoria, OH 44830

Of a Permit-to-Install 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, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Permit-to-Install for the 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 emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0105171
Permit Description: Boiler #2 - change fuel firing provisions

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**B004**
Company Equipment ID:	#2 Boiler
Superseded Permit Number:	03-03905
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 2.a), Severability Clause

(2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements

(3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A. 9., Reporting Requirements

(5) Standard Term and Condition A. 10., Applicability

(6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A. 14., Public Disclosure

(8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A. 16., Fees

(10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

d) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted

(i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

C. Emissions Unit Terms and Conditions

1. B004, #2 Boiler

Operations, Property and/or Equipment Description:

Boiler 2 - 69 mmBTU /hr - natural gas, No.2 fuel oil, No. 6 fuel oil, and/or biofuel (soybean oils).

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) 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)	0.37 lb nitrogen oxides (NO_X) /mmBtu of actual heat input 0.084 lb carbon monoxide (CO) /mmBtu of actual heat input 0.09 lb particulate emissions (PE) /mmBtu of actual heat input (when firing No. 6 fuel oil) See b)(2)b.
b.	OAC rule 3745-31-05(D)	39.0 tons NO_X per rolling, 12-month period [See b)(2)a.] 39.0 tons SO_2 per rolling, 12-month period [See b)(2)a.] 9.9 tons PE per rolling 12-month period [See b(2)a]
c.	OAC rule 3745-17-10 (B)(1)	0.020 lb particulate emissions (PE) /mmBtu of actual heat input (when firing natural gas and/or No. 2 fuel oil)
d.	OAC rule 3745-17-10 (C)(2)	See b)(2)c.
e.	OAC rule 3745-18-06(D)	1.6 lb sulfur dioxide (SO_2) /mmBtu of actual heat input
f.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as provided by rule.
g.	OAC rule 3745-21-08(B)	See b)(2)d.
h.	40 CFR 63.52(a)(2)	See b)(2)e.

(2) Additional Terms and Conditions

a. This permit establishes the federally enforceable emission limitations in b)(1)b for purposes of establishing the emissions unit as a minor modification for attainment New Source Review. The emission limitations are based on fuel usage restrictions [see c)(3)] for the purpose of establishing federally enforceable limitations to avoid "Prevention of Significant Deterioration" (PSD) applicability.

b. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-17-10(B)(1), 3745-18-06(D), and 3745-31-05(D).

c. The emissions limit specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

d. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in this permit to install.

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. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions 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.

e. This emissions unit is subject to a case-by-case MACT determination pursuant to section 112(j) of the Clean Air Act (CAA) due to the June 8, 2007 D.C. Circuit Court of Appeals decision to vacate the Boiler MACT (40 CFR Part 63, Subpart DDDDD).

If notified by the Ohio EPA or U.S. EPA, the permittee shall submit an application for a revision to this Title V permit that meets the requirements of 40 CFR 63.52(a)(2) pertaining to case-by-case MACT determinations. The 30-day clock for submittal of a 112(j) application does not begin until such notification is made by Ohio EPA or U.S. EPA.

c) Operational Restrictions

(1) The permittee shall burn only natural gas, no. 2 fuel oil, no. 6 fuel oil, and/or biofuel oil as fuel in this emissions unit.

(2) The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in b)(1)e.

The maximum rolling, 12-month quantity of fuel burned in this emissions unit shall be limited by the following equation. The criteria of the limiting equation must be met for NO_X SO_2, and PE (meaning the calculated results for NO_X, SO_2, and PE must not exceed 39.0, 39.0, and 9.9 tons, respectively).

$$\sum_{M=1}^{12} \sum_{n} [(U_n)(C_n)\ (1\ \text{ton}/2000\ \text{lbs})] \leq \text{EMT}$$

where:

M = the increment of the rolling 12-month period;
n = the increment of the fuel usage input during the period;

U_n = total fuel usage, cubic feet of natural gas, gallons or mmBtu heat input of oil, for each individual fuel type in the units of the factor applied, for: natural gas, fuel oil number 2, biofuel

C_n = emission factor for the individual fuel:

0.20 lb NO_X /mmBtu (biofuel)
0.10 lb NO_X /mmcf of natural gas
0.15 lb NO_X /mmBtu (fuel oil number 2)
0.37 lb NO_X /mmBtu (fuel oil number 6)

0.0015 lb SO_2 /mmBtu (biofuel)
0.6 lb SO_2 /mmcf of natural gas
142(S*) lbs SO_2 /1000 gallons of fuel oil number 2
157(S*) lbs SO_2 /1000 gallons of fuel oil number 6

7.6 lbs filterable PE /mmcf of natural gas
10 lbs filterable PE /1000 gallons of fuel oil number 6
2 lbs filterable PE/1000 gallons of fuel oil number 2
0.07 lbs filterable PE/mmBtu (biofuel)

* S = sulfur content, weight percent

EMT = emission thresholds: 39.0 tons for NO_X; 39.0 tons for SO_2; 9.9 tons of PE

Emission factors other than those indicated above may be used with prior approval from the Ohio EPA, Northwest District Office.

This emissions unit has been in operation for greater than 12 months and as such the permittee has existing information to generate records to demonstrate compliance with the rolling 12-month restrictions upon issuance of this permit.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, fuel oil number 2, fuel oil number 6, or biofuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) For each shipment of fuel 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 and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745 18

04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as 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. [OAC 3745-77-07(C)(1) and PTI 03-3950]

(3) In lieu of d)(2) for No. 2 oil, the permittee may keep records of fuel oil supplier certification, which shall include the following information:

a. The name of the oil supplier.

b. A statement from the oil supplier that the oil complies with the specifications under the definition of 'distillate oil' in 40 CFR 60.41c.

c. The sulfur content of the oil.

(4) When burning #6 fuel oil, 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 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 monthly records of the following information:

a. the quantity of each individual fuel burned (natural gas in mmcf, oils in gallons);

b. the rolling 12-month summation of the usage rates for each individual fuel burned (natural gas in mmcf, oils in gallons);

c. the total NO_X emissions from each fuel burned, calculated as follows:

$E_n = (U_n)(C_n)$ (1ton /2000 lbs) where:

E_n = NO_X emissions from an individual fuel burned, in tons

U_n = total heat input (mmBtu) of the individual fuel - natural gas, fuel oil number 2, fuel oil number 6, biofuel

C_n = emission factor for the individual fuel in lbs NO_X/mmBtu

d. The total NO_X emission rate of all fuels burned, in tons/month, calculated as follows:

$EM = E_1 + E_2 + E_3 + \ldots + E_n$ where:

EM = Monthly NO_X emissions, in tons/month

E_n = NO_X emissions from each individual fuel burned, in tons [from d)(5)c]

e. The rolling 12-month NO_X emission rate of all fuels burned, calculated as follows:

ET = EM1 + EM2 + EM3 + ... +EM12 where:

ET = Annual NO_X emissions (tons) as summed from the previous 12 months of monthly NO_X emissions;

EM = Monthly NO_X emissions (tons/month)

f. The total SO_2 emissions from each fuel burned, calculated as follows:

$E_s = (U_s)(C_s)$ (1ton /2000 lbs) where:

E_s = SO_2 emissions from an individual fuel burned, in tons

U_s = for natural gas and vegetable oil, the total heat input (mmBtu) of each individual fuel;

C_s = emission factor for the individual fuel in lbs SO_2/mmBtu (for natural gas and vegetable oil) or lbs SO_2/gal (for fuel oil number 2 and fuel oil number 6)

g. The total SO_2 emission rate of all fuels burned, in tons/month, calculated as follows:

$EM = E_1 + E_2 + E_3 + \ldots + E_n$ where:

EM = Monthly SO_2 emissions, in tons/month

E_n = SO_2 emissions from each individual fuel burned, in tons [from d)(5)f]

h. The rolling 12-month SO_2 emission rate of all fuels burned, calculated as follows:

ET = EM1 + EM2 + EM3 + … +EM12 where:

ET = Annual SO_2 emissions (tons) as summed from the previous 12 months of monthly SO_2 emissions;

EM = Monthly SO_2 emissions (tons/month)

i. the total (filterable) PE emissions from each fuel burned, calculated as follows:

$E_n = (U_n)(C_n)$ (1ton /2000 lbs) where:

E_n = PE emissions from an individual fuel burned, in tons

U_n = total heat input (mmBtu) of the individual fuel - natural gas, fuel oil number 2, fuel oil number 6, biofuel

C_n = emission factor for the individual fuel in lbs PE/mmBtu

j. The total PE emission rate of all fuels burned, in tons/month, calculated as follows:

$EM = E_1 + E_2 + E_3 + \ldots + E_n$ where:

EM = Monthly PE emissions, in tons/month

E_n = PE emissions from each individual fuel burned, in tons [from d)(5)c]

k. The rolling 12-month PE emission rate of all fuels burned, calculated as follows:

ET = EM1 + EM2 + EM3 + ... +EM12 where:

ET = Annual PE emissions (tons) as summed from the previous 12 months of monthly NO_X emissions;

EM = Monthly PE emissions (tons/month)

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas, fuel oil number 2, fuel oil number 6, and/or biofuel was combusted in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(2) The permittee shall submit semiannual written reports that (a) identify all days during which any abnormal visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the abnormal visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

(3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. the rolling, 12-month SO_2 limitation specified in b)(1)b;

b. the rolling, 12-month NO_X limitation specified in b)(1)b;

c. the rolling, 12-month PE limitation specified in b)(1)b;

d. the fuel usage restrictions, based on the calculations specified in c)(3), for summing the NO_X, SO_2, and PE, rolling 12-month emissions; and

e. the sulfur content restriction for fuel oil specified in c)(2).

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) shall be determined in accordance with the following method(s):

a. Emission Limitation:
0.37 lb NO_X /mmBtu of actual heat input

Applicable Compliance Method:
The permittee may demonstrate compliance with the lb NO_X /mmBtu emission standard by multiplying the maximum hourly fuel oil* combustion rate (460 gal/hr) by the emission factor from AP-42 Table 1.3-1 (revised 09/98) of 55 pounds NO_X /1000 gal. of fuel oil and dividing by the maximum heat input to the boiler (69 mmBtu/hr).

* worst-case fuel, for this emissions unit

If required, the permittee shall demonstrate compliance in accordance with Methods 1- 4 and 7 of 40 CFR, Part 60, Appendix A.

b. Emission Limitation:
0.084 lb CO /mmBtu of actual heat input

Applicable Compliance Method:
The permittee may demonstrate compliance with the lb CO /mmBtu emission standard by multiplying the maximum hourly natural gas combustion rate (0.0657 mmcu. ft./hr) by the emission factor from AP-42 Table 1.4-1 (revised 07/98) of 84 pounds CO /mm cu. ft. of natural gas and dividing by the maximum heat input to the boiler (69 mmBtu/hr).

* worst-case fuel, for this emissions unit

If required, the permittee shall demonstrate compliance in accordance with Methods 1- 4 and 10 of 40 CFR, Part 60, Appendix A.

c. Emission Limitation:
1.6 pounds SO_2 /mmBtu of actual heat input

Applicable Compliance Method:
Compliance with the allowable sulfur dioxide emission limitation shall be demonstrated in accordance with the recordkeeping and calculations specified in d)(2) and d)(3) as applicable.

If required, the permittee shall demonstrate compliance with the SO_2 emission limitation above in accordance with the methods specified in OAC rule 3745-18-04(E)(1).

When firing natural gas or biofuel, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

d. Emission Limitation:
0.09 pound particulate emissions (PE) /mmBtu of actual heat input (when firing No. 6 fuel oil)

Applicable Compliance Method:
Compliance may be determined by multiplying the maximum fuel firing capacity of the emissions unit (460 gallons/hour, for No. 6) by the AP-42, Table 1.3-1 (revised 9/98) emission factor for No. 6 fuel oil (10 lbs PE/1000 gallons), and then dividing by the emissions unit's maximum heat input capacity (69 mmBtu/hr).

If required, the permittee shall demonstrate compliance in accordance with Methods 1- 5 of 40 CFR, Part 60, Appendix A.

e. Emission Limitation:
0.020 lb PE /mmBtu of actual heat input (when firing natural gas and/or No. 2 fuel oil)

Applicable Compliance Method:
Compliance may be determined by multiplying the maximum fuel firing capacity of the emissions unit (493 gallons/hour, for No. 2) by the AP-42, Table 1.3-1 (revised 9/98) emission factor for No. 2 fuel oil (2 lbs PE/1000 gallons), and then dividing by the emissions unit's maximum heat input capacity (69 mmBtu/hr).

If required, compliance with the hourly limitation above shall be based upon the results of emission testing conducted in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

f. Emission Limitation
39.0 tons of NO_X per rolling, 12-month period

Applicable Compliance Method
Compliance with the above emission limitation shall be demonstrated through record keeping requirements in d)(5).

g. Emission Limitation
39.0 tons of SO_2 per rolling, 12-month period

Applicable Compliance Method
Compliance with the above emission limitation shall be demonstrated through record keeping requirements in d)(5).

h. Emission Limitation
9.9 tons of PE per rolling, 12-month period

Applicable Compliance Method
Compliance with the above emission limitation shall be demonstrated through record keeping requirements in d)(5).

i. Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
Compliance with the visible PE limitation shall be determined in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) This permit supersedes Permit to Install (PTI) 03-3905, last modified December 28, 2000.