



State of Ohio Environmental Protection Agency

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10/15/2009

BILL SUTTON
ST. VINCENT MERCY MEDICAL CENTER
2213 CHERRY STREET
TOLEDO, OH 43608

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0448010051
Permit Number: P0105040
Permit Type: Renewal
County: Lucas

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:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Toledo Blade. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page <http://www.epa.ohio.gov/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
TDES; Michigan; Indiana; Canada

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

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
ST. VINCENT MERCY MEDICAL CENTER

Issue Date: 10/15/2009
Permit Number: P0105040
Permit Type: Renewal
Permit Description: B004 & B005 two 79 mmBTU/hr nat gas & distillate fuel oil boilers
Facility ID: 0448010051
Facility Location: ST. VINCENT MERCY MEDICAL CENTER
2213 CHERRY STREET,
TOLEDO, OH 43608
Facility Description: General Medical and Surgical Hospitals

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Mary Lehman-Schmidt at Toledo Department of Environmental Services, 348 South Erie Street or (419)936-3015. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

St. Vincent Mercy Medical Center has two steam generators, No. 1 & 2, 79 mmBtu/hr natural gas/No. 2 fuel-fired boilers (B004 & B005) permitted under PTI 04-687, issued August 14, 1991. This is a renewal of the permit to operate for the two boilers. The permit language and formatting have been updated to current permit writing standards and current AP-42 emissions factors were used to update emissions limitations per OEPA policy.

3. Facility Emissions and Attainment Status:

The facility is currently a minor source of all pollutants, and will remain a minor source under the conditions of this permit renewal. Toledo is designated attainment for all pollutants.

Facility allowable emissions:

Emissions Unit	PTI	NOx, tons/yr	PE, tons/yr	SO2, tons/yr
B004, B005*	04-687	47.2	6.4	2.4
Total*		47.2*	6.4*	2.4*

*Individual and combined limits for B004 & B005

4. Source Emissions:

Pollutant	Allowable Under PTI 04-687, issued 8/14/1991	Old AP-42 Emissions Factor	Current AP-42 Emissions Factor	Allowable Under PTIO Renewal (P0105040)
NOx	23.6 tpy, each	55 lb/1000 gal (distillate fuel oil) 140 lb/10 ⁶ cf (nat. gas)	20 lb/1000 gal (distillate fuel oil) 100 lb/10 ⁶ scf (nat. gas)	47.2 tpy, each and combined
	0.15 lb NOx/10 ⁶ Btu input (BAT est. for nat. gas and distillate fuel oil)	--	--	0.15 lb/10 ⁶ Btu input (nat. gas and distillate fuel oil)
PE	3.2 tpy, each	12.3 lb/1000 gal (distillate fuel oil) 3 lb PE/10 ⁶ scf (nat. gas)	2 lb/1000 gal (distillate fuel oil) 7.6 lb PE/10 ⁶ scf (nat. gas)	6.4 tpy, each and combined
	0.02 lb PE/10 ⁶	--	--	0.02 lb/10 ⁶ Btu



	Btu input (OAC rule 3745-17-10(B)(1) for nat. gas & distillate fuel oil)			(nat. gas and distillate fuel oil)
	No visible emissions (BAT est. for VEs)	--	--	No visible emissions
SO ₂	1.2 tpy, each	146 lb/1000 gal (distillate fuel oil) 0.6 lb/10 ⁶ ft ³ (nat. gas)	0.5 lb/10 ⁶ Btu (distillate fuel oil) 0.6 lb/10 ⁶ ft ³ (nat. gas)	2.4 tpy, each and combined
	0.6 lb SO ₂ /10 ⁶ ft ³ when burning natural gas (BAT est. for nat. gas)	--	--	0.6 lb/10 ⁶ ft ³ (nat. gas) 0.5 lb/mmBtu (distillate fuel oil)
	0.5 weight percent in distillate fuel oil when burning oil (40 CFR 60, Subpart Dc)	--	--	0.5 weight percent in distillate fuel oil when burning oil (40 CFR 60, Subpart Dc)
Individual and combined fuel usage for B004 and B005 is restricted to 600 mmscf/yr natural gas and 64,000 gal/yr distillate fuel oil.				

5. Conclusion:

This permit should be renewed.

6. Please provide additional notes or comments as necessary:

AP-42 emissions factors for both natural gas and No. 2 fuel oil were revised in 1998. New worst-case emissions calculations were performed. Emissions did not increase with the revised AP-42 emissions factors.

The Division of Air Pollution Control (DAPC) has implemented a Permit to Install/Permit to Operate (PTIO) permitting system which combines the PTI and the PTO into a more efficient permitting document. The PTIO for St. Vincent's will include the new 10-year renewal and reporting requirements developed under the PTIO system.

Applicable Regulations

- OAC rule 3745-31-05(A)(3) Best available technology.
- OAC rule 3745-31-05(D) The permittee has requested federally enforceable restrictions on this emissions unit to avoid major new source review.
- OAC rule 3745-17-07(A)(1) 20% opacity as a 6-minute average, unless otherwise specified by the rule



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0105040
Facility ID: 0448010051

- OAC rule 3745-17-10(B)(1) 0.020 lb PE/mmBtu actual heat input
- OAC rule 3745-18-06(A) exemption from OAC rule 3745-18-06(D) on days when only natural gas is fired
- OAC rule 3745-18-06(D) 1.6 lbs SO₂/mmBtu actual heat input on days when No. 2 fuel oil is fired
- OAC rule 3745-21-07(B) Rescinded
- OAC rule 3745-21-08(B) Rescinded
- OAC rule 3745-23-06(B) Rescinded
- 40 CFR Part 60, Subpart Dc (§60.43c(c), (d); §60.45c(a); §60.47c(a)(1, 2 or 3), (c); §60.48c(f))

Source Emissions:

First, review the calculations that established the existing emissions limitations in PTI 04-687:

Permit Allowables Established in PTI 04-687:

The permit allowables established in PTI 04-687 were based on OAC rule 3745-17-10(B)(1) for particulate (0.020 lb/10⁶ Btu – gas & No. 2 oil), 40 CFR 60, Subpart Dc 0.50 lb SO₂/10⁶ Btu for No. 2 oil with a limit of 0.5% sulfur and AP-42 0.6 lb SO₂/10⁶ cu. ft for natural gas and the NO_x AP-42 emission factor at the time the initial PTI was written of 0.15 lb/10⁶ Btu for gas and No. 2 fuel oil. (Note: A comparison of the revised AP-42 emissions factors and the SO₂ emission factor established by the NSPS (40 CFR 60, Subpart Dc) indicates that the emissions limitations established by the original BAT do not need to be revised because updated AP-42 emissions factors do not increase emissions.)

Under PTI 04-687, the permittee volunteered a combined natural gas usage restriction of 600,000,000 cu. ft/yr and a No. 2 fuel oil usage restriction of 64,000 gal/yr. The annual permit allowable emissions for each boiler were based on assuming that each boiler will use no more than half of the annual fuel usage restrictions for gas and oil. As such, the tpy PTI limitation for each boiler was not federally enforceable. However, since short-term limitations are federally enforceable, and there was a federally enforceable combined fuel usage restriction, there was an inherently federally enforceable tpy limitation on the combined emissions from B004 and B005 based on multiplying the short-term limitation by the combined fuel-usage operational restrictions for B004 and B005.

PTI 04-687 established the following combined limits:

NO_x: BAT established in PTI 04-687 = 0.15 lb NO_x/mmBtu (No. 2 fuel oil & nat. gas) using 1,050 Btu/cu. ft
 Nat gas & No. 2 fuel: $(0.15 \text{ lb NO}_x/10^6 \text{ Btu})(1,050 \text{ Btu/cu. ft.})(600,000,000 \text{ cu. ft./yr}) \div 2,000 \text{ lb/ton} = 47.2 \text{ tpy}$

PE:BAT established in PTI 04-687 = 0.02 lb PE/mmBtu (No. 2 fuel oil & nat. gas) using 1,050 Btu/cu. ft.
 Nat. gas: $(0.02 \text{ lb PE}/10^6 \text{ Btu})(1,050 \text{ Btu/cu ft})(600,000,000 \text{ cu. ft./yr}) \div 2,000 \text{ lb/ton} = 6.3 \text{ tpy}$
 No. 2 oil: $(0.02 \text{ lb PE}/10^6 \text{ Btu})(0.14 \text{ mmBtu/gal})(64,000 \text{ gal/yr}) \div 2,000 \text{ lb/ton} = 0.1 \text{ tpy}$

SO₂:BAT = 0.50 lb SO₂/mmBtu (established by NSPS for No. 2 fuel oil) and 0.6 lb SO₂/mm cu. ft. (nat. gas)
 Nat. gas: $(0.6 \text{ lb SO}_2/10^6 \text{ cu. ft.})(600,000,000 \text{ cu. ft./yr}) \div 2,000 \text{ lb/ton} = 0.2 \text{ tpy}$
 No. 2 oil: $(0.50 \text{ lb SO}_2/\text{mmBtu})(0.14 \text{ mmBtu/gal})(64,000 \text{ gal/yr}) \div (2,000 \text{ lb/ton}) = 2.2 \text{ tpy}$



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0105040
Facility ID: 0448010051

Unrestricted Potential to Emit:

Based on the following unrestricted potential to emit calculations, the annual fuel usage restrictions for distillate fuel oil and natural gas will continue to be enforced.

Unrestricted Potential to emit will be estimated utilizing data for natural gas fired steam generators found in AP-42 Section 1.4, Natural Gas Combustion dated 7/98, Tables 1.4-1 and 1.4-2 for natural gas combustion in small boilers <100 mmBtu/hr and for No. 2 fuel oil, AP-42 Section 1.3 Fuel Oil Combustion dated 9/98, Table 1.3-1 (boilers<100 mmBtu/hr) uncontrolled:

NOx:

Nat. gas: $(100 \text{ lb NOx}/10^6 \text{ cu. ft. gas})(79 \text{ mmBtu/hr})(8,760 \text{ hr/yr}) \div (1,020 \text{ Btu/cu. ft.})(2,000 \text{ lb/ton}) = 33.9 \text{ tpy}$
No. 2 oil: $(0.020 \text{ lb NOx/gal})(79 \text{ mmBtu/hr})(8,760 \text{ hr/yr}) \div (0.14 \text{ mmBtu/gal})(2,000 \text{ lb/ton}) = 49.4 \text{ tpy}$

PE:

Nat. gas: $(1.9 \text{ lb PE}/10^6 \text{ cu. ft. gas})(79 \text{ mmBtu/hr})(8,760 \text{ hr/yr}) \div (1,020 \text{ Btu/cu. ft.})(2,000 \text{ lb/ton}) = 0.65 \text{ tpy}$
No. 2 oil: $(0.002 \text{ lb PE/gal})(79 \text{ mmBtu/hr})(8,760 \text{ hr/yr}) \div (0.14 \text{ mmBtu/gal})(2,000 \text{ lb/ton}) = 4.9 \text{ tpy}$

SO2:

Nat. gas: $(0.6 \text{ lb SO}_2/10^6 \text{ cu. ft. gas})(79 \text{ mmBtu/hr})(8,760 \text{ hr/yr}) \div (1,020 \text{ Btu/cu. ft.})(2,000 \text{ lb/ton}) = 0.20 \text{ tpy}$
No. 2 oil: $(0.142 \text{ lb SO}_2/\text{gal})(0.50)(79 \text{ mmBtu/hr})(8,760 \text{ hr/yr}) \div (0.14 \text{ mmBtu/gal})(2,000 \text{ lb/ton}) = 175.5 \text{ tpy}$

The fuel usage restrictions will remain enforceable for this facility and allowable emissions will be based on restricted potential to emit.

Permit Allowables (Based on Restricted Potential to Emit):

The permit allowables will be determined based on the restricted potential to emit with fuel usage limitations for burning distillate fuel oil and natural gas.

NOx:

Nat. gas: $(100 \text{ lb NOx}/\text{mmscf} \div 1,020 \text{ Btu/cu.ft.})(600 \text{ mmscf/yr})(1,020 \text{ Btu/cu. ft.})(2,000 \text{ lb/ton}) = 30 \text{ tpy}$
No. 2 oil: $(20 \text{ lb NOx}/1,000 \text{ gal} \div 140 \text{ mmBtu}/1,000 \text{ gal})(64,000 \text{ gal/yr})(140 \text{ mmBtu}/1,000 \text{ gal}) \div (2,000 \text{ lb/ton}) = 0.64 \text{ tpy}$

PE:

Nat. gas: $(7.6 \text{ lb PE}/\text{mmscf} \div 1,020 \text{ mmBtu}/\text{mmcf})(600 \text{ mmcf/yr})(1,020 \text{ Btu/cu. ft.}) \div (2,000 \text{ lb/ton}) = 2.3 \text{ tpy}$
No. 2 oil: $(20 \text{ lb PE}/1,000 \text{ gal} \div 140 \text{ mmBtu}/1,000 \text{ gal})(64,000 \text{ gal/yr})(140 \text{ mmBtu}/1,000 \text{ gal}) \div (2,000 \text{ lb/ton}) = 0.64 \text{ tpy}$

SO2:

Nat. gas: $(0.6 \text{ lb SO}_2/\text{mmscf})(600 \text{ mmscf/yr}) \div (2,000 \text{ lb/ton}) = 0.20 \text{ tpy}$
No. 2 oil: $(0.142 \text{ lb SO}_2/\text{gal})(0.50)(64,000 \text{ gal/yr}) \div (2,000 \text{ lb/ton}) = 2.2 \text{ tpy}$

Because restricted potential to emit emissions are less than or equal to the allowable emissions established by PTI 04-687, the permit limits for all pollutants will remain unchanged in this PTIO renewal.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0105040
Facility ID: 0448010051

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
NOx	47.2 (no change)
PE	6.4 (no change)
SO ₂	2.4 (no change)



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

**Air Pollution Permit-to-Install and Operate
for
ST. VINCENT MERCY MEDICAL CENTER**

Facility ID: 0448010051
Permit Number: P0105040
Permit Type: Renewal
Issued: 10/15/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Air Pollution Permit-to-Install and Operate
for
ST. VINCENT MERCY MEDICAL CENTER

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. Emissions Unit Group - 79 mmBtu/hr nat. gas & No.2 boil: B004, B005, 11



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105040

Facility ID: 0448010051

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0448010051
Application Number(s): A0037788
Permit Number: P0105040
Permit Description: B004 & B005 two 79 mmBTU/hr nat gas & distillate fuel oil boilers
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 10/15/2009
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

ST. VINCENT MERCY MEDICAL CENTER
2213 CHERRY STREET
TOLEDO, OH 43608

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:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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

Draft Permit-to-Install and Operate

Permit Number: P0105040

Facility ID: 0448010051

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0105040

Permit Description: B004 & B005 two 79 mmBTU/hr nat gas & distillate fuel oil boilers

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

Group Name: 79 mmBtu/hr nat. gas & No.2 boil

Emissions Unit ID:	B004
Company Equipment ID:	Boiler #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B005
Company Equipment ID:	Boiler #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105040

Facility ID: 0448010051

Effective Date: To be entered upon final issuance

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 Toledo Department 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 change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0105040

Facility ID: 0448010051

Effective Date: To be entered upon final issuance

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



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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.



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C. Emissions Unit Terms and Conditions



1. Emissions Unit Group - 79 mmBtu/hr nat. gas & No.2 boil: B004, B005,

EU ID	Operations, Property and/or Equipment Description
B004	79 mmBtu/hr natural gas and No. 2 fuel oil-fired boiler
B005	79 mmBtu/hr natural gas and No. 2 fuel oil-fired boiler

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) (PTI 04-687, issued 8/14/1991)	Nitrogen oxides (NOx) emissions shall not exceed 0.15 lb/mmBtu of heat input. NOx emissions shall not exceed 47.2 tons per year (tpy) each. Particulate emissions (PE) shall not exceed 6.4 tpy each. Sulfur dioxide (SO ₂) emissions shall not exceed 0.6 lb/mm cu. ft. when burning natural gas. SO ₂ limitation shall not exceed 0.5 weight percent sulfur when burning No. 2 fuel oil. SO ₂ emissions shall not exceed 2.4 tpy each. The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-05(D), 3745-21-08(B),



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		3745-17-10(B)(1), and 40 CFR, Part 60, Subpart Dc. No visible emissions of particulate.
b.	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
c.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.020 lb/mmBtu of actual heat input.
d.	OAC rule 3745-18-06(D)	Exempt, by the provisions of OAC rule 3745-18-06(A) during any calendar day in which natural gas is the only fuel burned. The emission limitation for oil specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-21-08(B)	See b)(2)a.
f.	OAC rule 3745-31-05(D)	The combined emissions of NO _x from emissions units B004 and B005 shall not exceed 47.2 tpy. The combined emissions of PE from emissions units B004 and B005 shall not exceed 6.4 tpy. The combined emissions of SO ₂ from emissions units B004 and B005 shall not exceed 2.4 tpy.
g.	40 CFR Part 60, Subpart Dc	The visible particulate emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3). The SO ₂ emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3). See b)(2)b.



(2) Additional Terms and Conditions

- a. 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).

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 U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revisions 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.

- b. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency (U.S. EPA), 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency (Ohio EPA).

c) Operational Restrictions

- (1) The maximum combined annual No. 2 fuel oil usage rate shall not exceed 64,000 gallons per rolling, 12-month period for B004 and B005.
- (2) The maximum combined annual natural gas burned shall not exceed 600,000,000 cu. ft. per rolling, 12-month period for B004 and B005.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas or distillate fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in each emissions unit.
- (2) For each day during which the permittee burns distillate 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. the total duration of any visible emission incident; and
- c. any corrective actions taken to eliminate the visible emissions.
- (3) The permittee shall monitor and record the sulfur content of the fuel oil combusted in each emissions unit by one of the following:
- a. an initial performance test consisting of sampling and analyzing the oil in the initial tank of oil to be fired in the steam generating unit to demonstrate that the oil contains 0.5 weight percent sulfur or less and thereafter sampling the oil in



the fuel tank after each new shipment of oil is received, as described under 40 CFR 60.46c(d)(2);

OR

- b. fuel supplier certification including:
 - i. the name of the oil supplier;
 - ii. a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR 60.41c;
 - iii. the sulfur content or maximum sulfur content of the oil;
 - iv. and the performance test consisting of the certification from the fuel supplier, as described in 40 CFR 60.48c(f).

(4) The permittee shall maintain monthly records of the following information:

- a. The combined No. 2 fuel oil usage rate in B004 and B005 (in gallons).
- b. The rolling, 12-month total No. 2 fuel oil usage rate in B004 and B005 combined (in gallons).
- c. The volume of natural gas burned in B004 and B005 (in cu. ft.).
- d. The rolling, 12-month total volume of natural gas burned in B004 and B005 (in cu. ft.).

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Toledo Division of Environmental Services) in writing of any fuel burned in B004 and B005 other than natural gas or No. 2 fuel oil.
- (2) The permittee monitoring the sulfur content of the fuel oil combusted in B004 and B005 by sampling and analyzing the oil in the fuel tank required by d)(2)a. shall submit semiannual written reports which include the following information:
 - a. the name of the oil supplier;
 - b. the location of the oil when the sample was drawn for analysis to determine the sulfur content of the oil;
 - c. the sulfur content of the oil; and
 - d. the method used to determine the sulfur content of the oil.
- (3) The permittee monitoring the sulfur content of the fuel oil combusted in B004 and B005 by fuel supplier certification shall submit copies of the fuel supplier certification required by d)(3)b. and a certified statement signed by a responsible official that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.



- (4) The permittee shall submit deviation (excursion) reports that identify all exceedances of the annual No. 2 fuel oil usage limitation. These reports shall be submitted with the annual Permit Evaluation Reports by the due date identified in the Authorization section of this permit.
 - (5) The permittee shall submit deviation (excursion) reports that identify all exceedances of the annual natural gas usage limitation. These reports shall be submitted with the annual Permit Evaluation Reports by the due date identified in the Authorization section of this permit.
 - (6) 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.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b) shall be determined in accordance with the following methods:
 - a. Emission Limitation(s):

No visible emissions.

Applicable Compliance Method(s):

If required, the permittee shall demonstrate compliance with this emission limitation through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 22 and the methods of compliance in accordance with OAC rule 3745-17-03(B)(4).
 - b. Emission Limitation:

0.15 pound of NO_x per mmBtu

Applicable Compliance Method:

Compliance may be determined through calculations based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors,

For natural gas: Table 1.4-2 dated 7/98, as follows: divide the emission factor of 100 pounds of NO_x emissions per million standard cubic feet by a heating value of 1020 Btus per standard cubic foot.

For distillate fuel oil: Table 1.3-1 dated 9/98, as follows: divide the emission factor of 20 pounds of NO_x emissions per 1,000 gallons of distillate fuel oil by a heating value of 140 mmBtus per 1,000 gallons of distillate fuel oil.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4



and Method 7 of 40 CFR, Part 60 Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation(s):

47.2 tpy NOx

Applicable Compliance Method(s):

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated as a summation of emissions due to the combustion of the maximum allowable throughput of natural gas and fuel oil calculated as follows:

For natural gas: multiply the short term emission limitation (100 lb NOx/mmscft ÷ 1020 mmBtu/mmscft) by the maximum allowable annual fuel usage rate (600 mmscft/yr) and by 1020 mmBtu/mmscft and divide by 2,000 pounds per ton.

For distillate fuel oil: multiply the short term emission limitation (20 lb NOx/1000 gal ÷ 140 mmBtu/1000 gal) by the maximum allowable annual fuel usage rate (64,000 gal/yr) and by 140 mmBtu/1000 gal and divide by 2,000 pounds per ton.

d. Emission Limitation:

0.020 pound PE per mmBtu of heat input

Applicable Compliance Method:

Compliance may be determined through calculations based on emissions factors specified in USPEA reference document AP-42, Fifth Edition, "Compilation of Air Pollution Emission Factors",

For natural gas: Table 1.4-1, dated 7/98, as follows: divide the emission factor of 7.6 pounds of PE per mmscf by a heating value of 1020 Btu/scf.

For distillate fuel oil: Table 1.3-1, dated 9/98, as follows: divide the emission factor of 20 pounds PE per 1000 gallons of distillate fuel oil by a heating value of 140 mmBtus per 1000 gallons of distillate fuel oil.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-5 of 40 CFR, Part 60 Appendix A and the methods of compliance in OAC rule 3745-17-03(B)(9). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

e. Emission Limitation(s):

6.4 tpy PE

Applicable Compliance Method(s):

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated as a summation of emissions



due to the combustion of the maximum allowable throughput of natural gas and fuel oil calculated as follows:

For natural gas: multiply the short term emission limitation (7.6 lb PE/mmscft ÷ 1020 mmBtu/mmscft) by the maximum allowable annual fuel usage rate (600 mmscft/yr) and by 1020 mmBtu/mmscft and divide by 2,000 pounds per ton.

For distillate fuel oil: multiply the short term emission limitation (20 lb PE/1000 gal ÷ 140 mmBtu/1000 gal) by the maximum allowable annual fuel usage rate (64,000 gal/yr) and by 140 mmBtu/1000 gal and divide by 2,000 pounds per ton.

f. Emission Limitation:

0.6 pound SO₂ per million cubic feet of heat input when combusting natural gas.

Applicable Compliance Method:

The emission limitation was based upon the emission factor from AP-42, "Compilation of Air Pollution Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (7/98) (0.6 pound of SO₂ per million cubic feet of natural gas).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4 and Method 6 of 40 CFR Part 60 Appendix A using the methods and procedures specified in OAC rule 3745-18-04. Alternative equivalent methods may be used based upon approval by the Toledo Division of Environmental Services.

g. Emission Limitation:

combust no oil that contains greater than 0.5 weight percent sulfur

Applicable Compliance Method:

Compliance may be demonstrated by the methods and procedures of 40 CFR 60.44c(g) and (h). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

h. Emission Limitation(s):

2.4 tpy SO₂ emissions

Applicable Compliance Method(s):

This emission limitation was established to reflect the potential to emit for this emissions unit. Compliance may be demonstrated as a summation of emissions due to the combustion of the maximum allowable throughput of natural gas and fuel oil calculated as follows:

For natural gas: multiply the short term emission limitation 0.6 lb SO₂/mmscft by the maximum allowable annual fuel usage rate (600 mmscft/yr) and divide by 2,000 pounds per ton.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

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Facility ID: 0448010051

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For distillate fuel oil: multiply the short term emission limitation (0.5 lb/mmBtu/hr*0.142 mmBtu/gal) by the maximum allowable annual fuel usage rate (64,000 gal/yr) and divide by 2,000 pounds per ton.

- g) Miscellaneous Requirements
 - (1) None.