



State of Ohio Environmental Protection Agency

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11/19/2009

David Kleimeyer  
Worthington Steel Company  
350 LAWTON AVENUE  
MONROE, OH 45050

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1409070344  
Permit Number: P0105493  
Permit Type: OAC Chapter 3745-31 Modification  
County: Butler

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
Yes	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, Journal News. 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 Hamilton County Dept. of Environmental Services  
250 William Howard Taft Pkwy.  
Cincinnati, OH 45219-2660

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 Hamilton County Dept. of Environmental Services at (513)946-7777.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*  
HCDOES; Indiana; Kentucky

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



PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
Worthington Steel Company

Issue Date: 11/19/2009  
Permit Number: P0105493  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Description: Modify existing permit to allow the use of either natural gas or propane.  
Facility ID: 1409070344  
Facility Location: Worthington Steel Company  
350 LAWTON AVENUE,  
Monroe, OH 45050  
Facility Description: All Other Miscellaneous Fabricated Metal Product Manufacturing

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 Paul Tedtman at Hamilton County Dept. of Environmental Services, 250 William Howard Taft Pkwy. or (513)946-7777. The permit can be downloaded from the Web page: [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc)





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

**DRAFT**

**Air Pollution Permit-to-Install and Operate  
for  
Worthington Steel Company**

Facility ID: 1409070344  
Permit Number: P0105493  
Permit Type: OAC Chapter 3745-31 Modification  
Issued: 11/19/2009  
Effective: To be entered upon final issuance  
Expiration: To be entered upon final issuance





**Air Pollution Permit-to-Install and Operate**  
for  
Worthington Steel Company

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0105493

**Facility ID:** 1409070344

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 1409070344  
Application Number(s): A0038385  
Permit Number: P0105493  
Permit Description: Modify existing permit to allow the use of either natural gas or propane.  
Permit Type: OAC Chapter 3745-31 Modification  
Permit Fee: \$800.00 *DO NOT send payment at this time - subject to change before final issuance*  
Issue Date: 11/19/2009  
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:

Worthington Steel Company  
350 LAWTON AVENUE  
Monroe, OH 45050

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

**Draft Permit-to-Install and Operate**

**Permit Number:** P0105493

**Facility ID:** 1409070344

**Effective Date:** To be entered upon final issuance

## Authorization (continued)

Permit Number: P0105493

Permit Description: Modify existing permit to allow the use of either natural gas or propane.

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>B005</b>
Company Equipment ID:	20.5 MMBtu Gas fired boiler
Superseded Permit Number:	P0097265
General Permit Category and Type:	Not Applicable

<b>Emissions Unit ID:</b>	<b>B006</b>
Company Equipment ID:	20.5 MMBtu Gas fired boiler
Superseded Permit Number:	P0097259
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:** P0105493

**Facility ID:** 1409070344

**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 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 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:** P0105493

**Facility ID:** 1409070344

**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.



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0105493

**Facility ID:** 1409070344

**Effective Date:** To be entered upon final issuance

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



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0105493

**Facility ID:** 1409070344

**Effective Date:** To be entered upon final issuance

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

**Draft Permit-to-Install and Operate**

**Permit Number:** P0105493

**Facility ID:** 1409070344

**Effective Date:** To be entered upon final issuance

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



**1. B005, 20.5 MMBtu Gas/Propane-fired Boiler**

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

20.5 MMBtu Gas/Propane-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) and ORC 3704.03(T)	Nitrogen oxides (NOx) emissions shall not exceed 0.14 lb/MMBtu.
b.	OAC rule 3745-31-05(E)	See b)(2)a.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.020 pound per MMBtu of actual heat input.
e.	OAC rule 3745-18-06(A)	Exempt, since natural gas and propane are the only fuels used in this emissions unit.
f.	40 CFR Part 60 Subpart Dc	See b)(2)e., d)(1) and d)(2).
g.	OAC rule 3745-21-08(B)	See b)(2)d.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
h.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)c.

(2) Additional Terms and Conditions

- a. Permit To Install and Operate P0105493 for this air contaminant source takes into account the following restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC 3745-31-05(A)(3):
  - i. for Sulfur Dioxide (SO<sub>2</sub>) emissions: the permittee shall only use natural gas or liquid propane gas.
- b. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitation listed in b)(1)a. above.
- c. The Best Available Technology (BAT) requirements under OAC 3745-31-05(A)(3) do not apply to the Particulate Emissions (PE), Particulate Matter ten microns and less in diameter (PM<sub>10</sub>), Carbon Monoxide (CO) and Volatile Organic Compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for PE, PM<sub>10</sub>, CO and VOC is less than ten tons per year.
- 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).

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.

- e. 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) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.



As an alternative to recording and maintaining records of the amounts of each fuel combusted during each day the operator may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

As an alternative to recording and maintaining records of the amounts of each fuel combusted during each day the operator may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to the property during each calendar month provided the only fuels combusted in any steam generating unit at that property are natural gas, wood, distillate oil meeting the current requirements in 40 CFR subpart Dc, section 60.42c. to use fuel certification to demonstrate compliance with the SO2 standard, and/or fuels, excluding coal and residual oil, not subject to an emission standard (excluding opacity).

- (2) All records required under 40 CFR subpart Dc, section 60.48c. shall be maintained by the permittee for a period of two years following the date of such record.

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.

f) Testing Requirements

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

- a. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

- b. Emission Limitation:

Nitrogen oxides (NOx) emissions shall not exceed 12.75 TPY.

Applicable Compliance Method:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", Section 1.5, Table 1.5-1 (7/08).

- c. Emission Limitation:

The Particulate Emissions (PE), Particulate Matter ten microns and less in diameter (PM10), Carbon Monoxide (CO) and Volatile Organic Compound (VOC)



emissions from this air contaminant source since the uncontrolled potential to emit for PE, PM10, CO and VOC is less than ten tons per year.

**Applicable Compliance Method:**

The PE emissions were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", Section 1.5, Table 1.5-1 (7/08). Compliance with the annual emission limitation shall be demonstrated by multiplying the lb of PE/MMBtu value by the maximum rated heat input capacity of the emissions unit (in MMBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

The PM10 emissions were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", Section 1.5, Table 1.5-1 (7/08). It is assumed that PM10 emissions are equivalent to PE emissions in this table. Compliance with the annual emission limitation shall be demonstrated by multiplying the lb of PE/MMBtu value by the maximum rated heat input capacity of the emissions unit (in MMBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

The CO emissions were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", Section 1.4, Table 1.4-1 (7/98). Compliance with the annual emission limitation shall be demonstrated by multiplying the lb of CO/MMBtu value by the maximum rated heat input capacity of the emissions unit (in MMBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

The VOC emissions were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", Section 1.4, Table 1.4-1 (7/98). Compliance with the annual emission limitation shall be demonstrated by multiplying the lb of OC/MMBtu value by the maximum rated heat input capacity of the emissions unit (in MMBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

**d. Emission Limitation:**

The Sulfur Dioxide (SO<sub>2</sub>) emissions are less than ten tons per year based on restricted fuel type use.

**Applicable Compliance Method:**

Compliance with the fuel use restriction shall be demonstrated by the record keeping in term d.1.

The SO<sub>2</sub> emissions were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", Section 1.4, Table 14.2-1 (7/98). Compliance with the annual emission limitation shall be demonstrated by multiplying the lb of SO<sub>2</sub>/MMBtu value by the maximum rated heat input capacity of the emissions unit (in MMBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.



e. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.020 pound per MMBtu of actual heat input.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", Section 1.5, Table 1.5-1 (7/08). If required compliance with the lb/MMBtu emission limitation shall be demonstrated by testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 – 5.

g) Miscellaneous Requirements

- (1) This permit to install and operate shall supersede permit to install 14-04497 issued on January 28, 1998, and administratively modified on April 18, 2007.



**2. B006, 20.5 MMBtu Gas fired boiler**

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

20.5 MMBtu Gas/Propane-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)	Nitrogen oxides (NOx) emissions shall not exceed 0.14 lb/MMBtu.
b.	OAC rule 3745-31-05(E)	See b)(2)a.
c.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
d.	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.020 pound per MMBtu of actual heat input.
e.	OAC rule 3745-18-06(A)	Exempt, since natural gas and propane are the only fuels used in this emissions unit.
f.	40 CFR Part 60 Subpart Dc	See b)(2)e., d)(1) and d)(2).
g.	OAC rule 3745-21-08(B)	See b)(2)d.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
h.	OAC rule 3745-31-05(A)(3)(a)(ii)	See b)(2)c.

(2) Additional Terms and Conditions

- a. Permit To Install and Operate P0105493 for this air contaminant source takes into account the following restriction as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements under OAC 3745-31-05(A)(3):
  - i. for Sulfur Dioxide (SO<sub>2</sub>) emissions: the permittee shall only use natural gas or liquid propane gas.
- b. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the emission limitation listed in b)(1)a. above.
- c. The Best Available Technology (BAT) requirements under OAC 3745-31-05(A)(3) do not apply to the Particulate Emissions (PE), Particulate Matter ten microns and less in diameter (PM<sub>10</sub>), Carbon Monoxide (CO) and Volatile Organic Compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for PE, PM<sub>10</sub>, CO and VOC is less than ten tons per year.
- 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).

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.

- e. 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) None.

d) Monitoring and/or Recordkeeping Requirements

- (1) The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.



As an alternative to recording and maintaining records of the amounts of each fuel combusted during each day the operator may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

As an alternative to recording and maintaining records of the amounts of each fuel combusted during each day the operator may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to the property during each calendar month provided the only fuels combusted in any steam generating unit at that property are natural gas, wood, distillate oil meeting the current requirements in 40 CFR subpart Dc, section 60.42C to use fuel certification to demonstrate compliance with the SO2 standard, and/or fuels, excluding coal and residual oil, not subject to an emission standard (excluding opacity).

- (2) All records required under 40 CFR subpart Dc section 60.48c shall be maintained by the permittee for a period of two years following the date of such record.

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.

f) Testing Requirements

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

- a. Emission Limitation:

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

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

- b. Emission Limitation:

Nitrogen oxides (NOx) emissions shall not exceed 0.14 lb/MMBtu.

Applicable Compliance Method:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", Section 1.5, Table 1.5-1 (7/08). If required compliance with the lb/MMBtu emission limitation shall be demonstrated by testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 – 4 and 10.



c. Emission Limitation:

The Particulate Emissions (PE), Particulate Matter ten microns and less in diameter (PM10), Carbon Monoxide (CO) and Volatile Organic Compound (VOC) emissions from this air contaminant source since the uncontrolled potential to emit for PE, PM10, CO and VOC is less than ten tons per year.

Applicable Compliance Method:

The PE emissions were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", Section 1.5, Table 1.5-1 (7/08). Compliance with the annual emission limitation shall be demonstrated by multiplying the lb of PE/MMBtu value by the maximum rated heat input capacity of the emissions unit (in MMBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

The PM10 emissions were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", Section 1.5, Table 1.5-1 (7/08). It is assumed that PM10 emissions are equivalent to PE emissions in this table. Compliance with the annual emission limitation shall be demonstrated by multiplying the lb of PE/MMBtu value by the maximum rated heat input capacity of the emissions unit (in MMBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

The CO emissions were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", Section 1.4, Table 1.4-1 (7/98). Compliance with the annual emission limitation shall be demonstrated by multiplying the lb of CO/MMBtu value by the maximum rated heat input capacity of the emissions unit (in MMBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

The VOC emissions were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", Section 1.4, Table 1.4-1 (7/98). Compliance with the annual emission limitation shall be demonstrated by multiplying the lb of OC/MMBtu value by the maximum rated heat input capacity of the emissions unit (in MMBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

d. Emission Limitation:

The Sulfur Dioxide (SO<sub>2</sub>) emissions are less than ten tons per year based on restricted fuel type use.

Applicable Compliance Method:

Compliance with the fuel use restriction shall be demonstrated by the record keeping in term d.1.

The SO<sub>2</sub> emissions were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", Section 1.4, Table 14.2-1 (7/98). Compliance with the annual emission limitation shall be demonstrated by multiplying the lb of SO<sub>2</sub>/MMBtu value by the maximum rated heat input capacity



of the emissions unit (in MMBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

e. Emission Limitation:

Particulate emissions (PE) shall not exceed 0.020 pound per MMBtu of actual heat input.

Applicable Compliance Method:

Compliance with the annual emission limitation shall be demonstrated by the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", Section 1.5, Table 1.5-1 (7/08). If required compliance with the lb/MMBtu emission limitation shall be demonstrated by testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 - 5.

g) Miscellaneous Requirements

- (1) This permit to install and operate shall supersede permit to install 14-04497 issued on January 28, 1998, and administratively modified on April 18, 2007.