



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

7/12/2010

Mr. Steven Benson
Chillicothe VAMC
17273 State Route 104
Chillicothe, OH 45601

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0671015004
Permit Number: P0106062
Permit Type: Initial Installation
County: Ross

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) 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 public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Newark Advocate. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. 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 Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138

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 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 is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,


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

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

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Chillicothe VAMC

Issue Date: 7/12/2010

Permit Number: P0106062

Permit Type: Initial Installation

Permit Description: Initial installation of 3 natural gas/fuel oil boilers rated at 29.29 mmBtu/hr.

Facility ID: 0671015004

Facility Location: Chillicothe VAMC
17273 State Route 104,
Chillicothe, OH 45601

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 Cara Cherry at Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138 or (740)385-8501. 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:

The Chillicothe Veterans Administration Medical Center (VAMC) is located at 17273 St. Rt. 104 in Chillicothe, Ohio. This permit is for the installation of a new central steam boiler plant. The new steam plant will consist of three Cleaver Brooks, natural gas/fuel oil boilers, B004, B005, and B006, rated at 29.29 MMBtu/hour each. Current design limitations will allow only two boilers in simultaneous operation at full load however; no restriction on operations is requested. It may be necessary to operate all three at partial load at times.

3. Facility Emissions and Attainment Status:

Ross County is in attainment for all criteria pollutants. A federally enforceable restriction to limit fuel oil usage to 300,000 gallons per rolling, 12-month period, will lower the potential emissions to less than 100 TPY for sulfur dioxide and, therefore, avoid Title V applicability for these units. The potential to emit (PTE) for all other criteria pollutants are well under Title V thresholds, and are listed below. The facility looked at all emissions units located at the facility in determining whether this application would trigger Title V for any criteria pollutant. With the fuel oil restriction, facility-wide PTE will remain under Title V thresholds.

Facility Wide Allowable Emissions						
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<u>Pollutant</u>	<u>2000 Kw Gen</u>	<u>365 Kw Gen</u>	<u>Exempt Boilers</u>	<u>Fuel Tanks</u>	<u>New Boilers</u>	<u>Total</u>
PE	0.5	0.3	1.2	--	3.09	5.09
NOx	16.1	3.8	19.7	--	19.23	58.83
SOx	2.7	0.1	1.1	--	10.5	14.4
OC	0.5	0.3	1.4	0.04	2.13	4.37
CO	3.7	0.8	4.3	--	13.86	22.66

4. Source Emissions:

The Chillicothe VAMC has requested a federally enforceable restriction to limit No. 2 fuel oil usage to 300,000 gallons per rolling, 12-month period. This will lower the potential emissions of sulfur dioxide to 10.5 tons per year. This restriction will allow the facility to avoid Title V applicability in addition to state modeling requirements. For natural gas use, all other pollutants' PTE has been calculated based on 8,760 hours of operation per year.



State of Ohio Environmental Protection Agency
 Division of Air Pollution Control

Permit Strategy Write-Up
Permit Number: P0106062
Facility ID: 0671015004

5. Conclusion:

The operational restrictions, emission limits, emissions testing, monitoring, record keeping, and reporting requirements of this permit are sufficient to provide federally enforceable limitations to limit the PTE from emissions units B004, B005, and B006.

6. Please provide additional notes or comments as necessary:

Organic Compound (OC) emissions from both fuels were calculated to be less than one ton per year from each boiler, therefore, they are not included in the Applicable Emissions Limitations. This permit should be issued Draft.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	3.09 Nat. Gas
PE	0.29 Fuel Oil
NOx	19.23 Nat. Gas
NOx	2.94 Fuel Oil
CO	13.86 Nat. Gas
CO	1.64 Fuel Oil
SOx	0.78 Nat. Gas
SOx	10.5 Fuel Oil

Natural gas emissions figured @ 8760 hours of operation times three boilers. Fuel Oil emissions based on 300,000 gallon restriction.



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Chillicothe VAMC**

Facility ID: 0671015004
Permit Number: P0106062
Permit Type: Initial Installation
Issued: 7/12/2010
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Chillicothe VAMC

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Authorization

Facility ID: 0671015004

Application Number(s): A0039133

Permit Number: P0106062

Permit Description: Initial installation of 3 natural gas/fuel oil boilers rated at 29.29 mmBtu/hr.

Permit Type: Initial Installation

Permit Fee: \$600.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 7/12/2010

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:

Chillicothe VAMC
17273 State Route 104
Chillicothe, OH 45601

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:

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

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



Authorization (continued)

Permit Number: P0106062

Permit Description: Initial installation of 3 natural gas/fuel oil boilers rated at 29.29 mmBtu/hr.

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

Group Name: 29.29 mmBtu NG/Fuel Oil Boilers

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
Emissions Unit ID:	B006
Company Equipment ID:	Boiler #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

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. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. 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 Ohio EPA DAPC, Southeast District Office 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 submitting¹ 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 emissions 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

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

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.

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.

B. Facility-Wide Terms and Conditions

Draft Permit-to-Install and Operate

Chillicothe VAMC

Permit Number: P0106062

Facility ID: 0671015004

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.
2. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart Dc: B004, B005 and B006. The complete NSPS requirements may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District Office or local air agency.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - 29.29 mmBtu/hr NG/fuel oil Boilers: B004, B005, B006,

EU ID	Operations, Property and/or Equipment Description
B004	Boiler #1 - 29.29 MMBtu/hr natural gas-fired using low-NOx burner / #2 fuel oil-fired w/ 0.5% sulfur content limit.
B005	Boiler #2 - 29.29 MMBtu/hr natural gas-fired using low-NOx burner / #2 fuel oil-fired w/ 0.5% sulfur content limit.
B006	Boiler #3 - 29.29 MMBtu/hr natural gas-fired using low-NOx burner / #2 fuel oil-fired w/ 0.5% sulfur content limit.

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. g)(1).

(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. b)(1)e.

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.

Draft Permit-to-Install and Operate

Chillicothe VAMC

Permit Number: P0106062**Facility ID:** 0671015004**Effective Date:** To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/31/01.	<p>Particulate emissions (PE) shall not exceed 0.008 lb/MMBtu and 1.03 tons per year (tpy) when using natural gas.</p> <p>PE shall not exceed 0.014 lb/MMBtu when using using No.2 fuel oil.</p> <p>Nitrogen oxides (NO_x) emissions shall not exceed 0.10 lb/MMBtu and 6.41 tpy when using natural gas.</p> <p>NO_x emissions shall not exceed 0.14 lb/MMBtu when using No. 2 fuel oil.</p> <p>Carbon monoxide (CO) emissions shall not exceed 0.036 lb/MMBtu and 4.62 tpy when using natural gas.</p> <p>CO emissions shall not exceed 0.078 lb/MMBtu when using No. 2 fuel oil.</p> <p>See b)(2)a.</p>
b.	OAC rule 3745-31-05(E) and OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)b.
c.	OAC rule 3745-17-07(A)(1)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
d.	OAC rule 3745-21-07(B)	See b)(2)d.
e.	OAC rule 3745-31-05(D) (to avoid Title V applicability)	<p>PE shall not exceed 0.29 ton per rolling, 12-month period, when using No. 2 fuel oil.</p> <p>NO_x emissions shall not exceed 2.94 tons per rolling, 12-month period, when using No. 2 fuel oil.</p> <p>CO emissions shall not exceed 1.64 tons per rolling, 12-month period, when using No. 2 fuel oil.</p> <p>Sulfur dioxide (SO₂) emissions shall not exceed 10.5 tons per rolling, 12-month period, when using No. 2 fuel oil.</p>

Draft Permit-to-Install and Operate

Chillicothe VAMC

Permit Number: P0106062

Facility ID: 0671015004

Effective Date: To be entered upon final issuance

		See c)(3).
f.	ORC 3704.03(T)	SO ₂ emissions shall not exceed 0.002 lb/MMBtu when using natural gas. The requirements of ORC 3704.03(T) also include the requirements of 40 CFR Part 60 Subpart Dc. See c)(1).
g.	40 CFR Part 60 Subpart Dc (40 CFR 60.40c-48c) [In accordance with 40 CFR 60.40c this emissions unit is a steam generating unit for which construction commenced after June 9, 1989 and has a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr.]	No owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO ₂ in excess of 0.50 lb/MMBtu heat input, or, as an alternative, no owner or operator of an affected facility that combusts oil shall combust oil in the affected facility that contains greater than 0.5 weight percent sulfur.
h.	40 CFR 60.1-19 (40 CFR 60.4246)	Certain General Provisions in 40 CFR 60.1-19 apply.
i.	OAC rule 3745-17-10(B)(1)	PE shall not exceed 0.02 lb/MMBtu when using either natural gas or No. 2 fuel oil. This emission limitation is less stringent than the limitation listed under OAC rule 3745-31-05(A)(3), until such time as U.S. EPA approves the December 1, 2006, version of OAC rule 3745-31-05 as part of the State Implementation Plan.
j.	OAC rule 3745-18-06(D)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to ORC 3704.03(T) and 40 CFR Part 60 Subpart Dc.

(2) Additional Terms and Conditions

- a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B.265

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Chillicothe VAMC

Permit Number: P0106062

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changes), such that BAT is no longer required by State regulations for NAAQS pollutants less than ten tons per year. However, that rule revision has not yet been approved by 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 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

- b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.
 - i. Permit to Install and operate P0106062 for these air contaminant sources takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purposes of avoiding BAT requirements under OAC rule 3745-31-05(A)(3) for NO_x emissions.
 - (a) The permittee shall burn only natural gas and/or No. 2 fuel oil in these emissions units.
 - (b) Use of low-NO_x burners.
 - ii. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE and CO emissions from these air contaminant sources since the uncontrolled potential to emit for PE and CO are less than ten tons per year.
- d. The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-07(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

c) Operational Restrictions

- (1) The permittee shall burn only natural gas and/or No. 2 fuel oil in this emissions unit.
- (2) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart Dc, including the following sections:

60.42c(h)	Compliance with SO ₂ limit or fuel oil sulfur limits based on certification from fuel supplier.
60.42c(i)	Periods of startup, shutdown, and malfunction.

- (3) The maximum annual No. 2 fuel oil usage rate for emissions units B004, B005, and B006 combined, shall not exceed 300,000 gallons per rolling, 12-month period. To

Draft Permit-to-Install and Operate

Chillicothe VAMC

Permit Number: P0106062

Facility ID: 0671015004

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ensure enforceability during the first 12 calendar months of operation, the permittee shall not exceed the No. 2 fuel oil usage levels specified in the following table:

Month	Maximum Allowable Cumulative Fuel Oil Usage (gallons)
1	75,000
1-2	150,000
1-3	225,000
1-4	300,000
1-5	300,000
1-6	300,000
1-7	300,000
1-8	300,000
1-9	300,000
1-10	300,000
1-11	300,000
1-12	300,000

After the first 12 calendar months of operation, compliance with the annual No. 2 fuel oil usage limitation shall be based upon a rolling, 12-month summation of the usage rates.

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart Dc, including the following sections:

60.46c(d)	Fuel sampling as an alternative to operating CEMS
60.46c(e) and (f)	Demonstrating compliance with SO ₂ standards based on fuel supplier certification
60.48c(e)	Required records associated with SO ₂ emission limits and fuel oil sulfur limits.

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60.48c(f)	Required records associated with fuel supplier certification.
60.48c(g)	Required records associated with amount of fuel combusted.
60.48c(h)	12-month rolling average basis due to federally enforceable requirement limiting the annual capacity.
60.48c(i)	2 year record retention required

- (2) The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day.
- (3) The permittee shall maintain monthly records of the following information:
 - a. The total volume of natural gas (million cubic feet) burned in this emissions unit.
 - b. The total number of gallons of No. 2 fuel oil used in this boiler for each month.
 - c. for the first 12 calendar months following the startup of the emissions units B004, B005, and B006 , the cumulative number of gallons of No. 2 fuel oil used in all three boilers calculated by adding the current month's No. 2 fuel oil for all three emissions units to the No. 2 fuel oil usage for each calendar month since the start up of the emissions units B004, B005, and B006.
 - d. Beginning after the first 12 calendar months following the start up of the emission units B004, B005, and B006, the rolling 12-month summation of total No.2 fuel usage for all three emissions units calculated by adding the current month's No. 2 fuel usage for the preceding eleven calendar months.

e) Reporting Requirements

- (1) The permittee shall submit semiannual reports and such other notifications and reports to the appropriate Ohio EPA District office as are required pursuant to 40 CFR part 60, Subpart Dc, per the following sections:

60.46c(a)(1)-(4)	Information required to be submitted in the construction notification.
60.48c(b)	Requirement to submit performance test data.
60.48c(d) and (e)	Required reports associated SO ₂ limits and fuel oil sulfur limits.
60.48c(j)	Required reporting periods under this subpart is each six month period unless

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	otherwise noted.
60.46c(e) and (f)	Demonstrating compliance with SO ₂ standards based on fuel supplier certification
60.48c(e)	Required records associated with SO ₂ emission limits and fuel oil sulfur limits.

(2) Pursuant to the NSPS, the permittee is required to report the following information at the appropriate times (if the information has not already been reported):

- a. Construction date (no later than 30 days after such date);
- b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. Actual start-up date (within 15 days after such date); and,
- d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to the appropriate local air agency or District Office and to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, Ohio 43216-3669

(3) The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month No. 2 fuel oil usage limitation and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative No. 2 fuel oil usage limitations. These reports shall be submitted with the annual Permit Evaluation Reports by the due date identified in the Authorization section of this permit.

(4) 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) For oil fired affected facilities where the owner or operator seeks to demonstrate compliance with the fuel oil sulfur limits under §60.42c based on shipment fuel sampling, the initial performance test shall consist 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 contain 0.5 weight percent sulfur or less. Thereafter, the owner or operator of the affected facility

shall sample the oil in the fuel tank after each new shipment of oil is received, as described under §60.46c(d)(2).

(2) For affected facilities subject to §60.429c(h)(1), (2), or (3) where the owner or operator seeks to demonstrate compliance with the SO₂ standards based on fuel supplier certification, the performance test shall consist of the certification from the fuel supplier, as described in §60.48c(f) as applicable.

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

a. Emission Limitations:

PE shall not exceed 0.008 lb/MMBtu and 1.03 tons per year (tpy) when using natural gas.

Applicable Compliance Methods:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (7/98). Compliance with the annual emission limitation may be demonstrated by multiplying the lb PE/MMBtu value by the maximum rated heat input capacity of the emissions unit (in MMBtu/hr), then multiplying by 8,760 hrs/yr and dividing by 2,000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5.

b. Emission Limitations:

PE shall not exceed 0.014 lb/MMBtu when using No. 2 fuel oil.

Applicable Compliance Methods:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-1 (9/98). Compliance with the lb/MMBtu emission limitation may be determined by converting the 2 lbs PE/10³ gal emission factor into lbs PE/MMBtu by dividing by 140 MMBtu/10³ gal.

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

c. Emission Limitations:

NO_x emissions shall not exceed 0.10 lb/MMBtu and 6.41 tpy when using natural gas.

Applicable Compliance Methods:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (7/98). Compliance with the lb/MMBtu emission limitation may be determined by dividing the 100 lbs NO_x/million cubic feet emission factor by 1020. Compliance with the annual emission limitation may be demonstrated by multiplying the lb NO_x/MMBtu value by the maximum rated heat input capacity of the emissions unit (in MMBtu/hr), then multiplying by 8,760 hrs/yr and dividing by 2,000 lbs/ton.

If required, nitrogen oxides emissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office

d. Emissions Limitations:

NO_x emissions shall not exceed 0.14 lb/MMBtu when using No. 2 fuel oil.

Applicable Compliance Methods:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-1 (9/98). Compliance with the lb/MMBtu emission limitation may be determined by converting the 20 lbs NO_x/10³ gal emission factor into lb NO_x/mmBtu by dividing by 140 MMBtu/10³ gal.

If required, nitrogen oxides emissions shall be determined according to test Methods 1 - 4, and 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office

e. Emission Limitations:

CO emissions shall not exceed 0.036 lb/MMBtu and 4.62 tpy when using natural gas.

Applicable Compliance Methods:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-1 (7/98). Compliance with the lb/MMBtu emission limitation may be determined by converting the 84 lbs CO/10⁶ scf emission factor into lb CO/MMBtu by dividing by 1,020 Btu/scf. Compliance with the annual emission limitation may be demonstrated by multiplying the lb CO/MMBtu value by the maximum rated heat input capacity of the emissions unit (in MMBtu/hr), then

multiplying by 8,760 hrs/yr and dividing by 2,000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 10.

f. Emission Limitations:

CO emissions shall not exceed 0.078 lb/MMBtu when using No. 2 fuel oil.

Applicable Compliance Methods:

The emission limitations were based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-1 (7/98). Compliance with the lb/MMBtu emission limitation may be determined by converting the 84 lbs CO/10⁶ scf emission factor into lb CO/MMBtu by dividing by 1,020 Btu/scf.

If required, carbon monoxide emissions shall be determined according to test Methods 1 - 4, and 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

g. Emission Limitations:

Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, visible particulate emissions shall be determined according to USEPA Method 9.

h. Emission Limitations:

No owner or operator of an affected facility that combust oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO₂ in excess of 0.50 lb/MMBtu heat input, or, as an alternative, no owner or operator of an affected facility that combust oil shall combust oil in the affected facility that contains greater than 0.5 weight percent sulfur.

Applicable Compliance Methods:

Compliance shall be demonstrated by the record keeping requirements described in 40 CFR §60.48c and §60.44c.

If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative

U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

i. Emission Limitations:

PE shall not exceed 0.29 ton per rolling, 12-month period, when using No. 2 fuel oil.

Applicable Compliance Methods:

Compliance with the rolling, 12-month period limitation shall be based on the records required by d)(3) and the following equation:

$$0.014 \text{ lb PE/MMBtu}(140,000 \text{ Btu/g})(\text{actual rolling, 12-month summation of fuel oil use in gallons})/1,000,000(.0005\text{t/lb}) = \text{TPY rolling, 12-month}$$

j. Emissions Limitations:

NO_x emissions shall not exceed 2.94 tons per rolling, 12-month period, when using No. 2 fuel oil.

Applicable Compliance Methods:

Compliance with the rolling, 12-month period limitation shall be based on the records required by d)(3) and the following equation:

$$0.14 \text{ lb NO}_x\text{/MMBtu}(140,000 \text{ Btu/g})(\text{actual rolling, 12-month summation of fuel oil use in gallons})/1,000,000(.0005\text{t/lb}) = \text{TPY rolling, 12-month}$$

k. Emission Limitations:

CO emissions shall not exceed 1.64 tons per rolling, 12-month period when using No. 2 fuel oil.

Applicable Compliance Methods:

Compliance with the rolling, 12-month period limitation shall be based on the records required by d)(3) and the following equation:

$$0.078 \text{ lb CO/mmBtu}(140,000 \text{ Btu/g})(\text{actual rolling, 12-month summation of fuel oil use in gallons})/1,000,000(.0005\text{t/lb}) = \text{TPY rolling, 12-month}$$

l. SO₂ emissions shall not exceed 10.5 tons per rolling, 12-month period when using No. 2 fuel oil.

Applicable Compliance Methods:

Compliance with the rolling, 12-month period limitation shall be based on the records required by d)(3) and the following equation:

$$0.50 \text{ lb SO}_2\text{/mmBtu}(140,000 \text{ Btu/g})(\text{actual rolling, 12-month summation of fuel oil use in gallons})/1,000,000(.0005\text{t/lb}) = \text{TPY rolling, 12-month}$$

m. Emission Limitation:

SO₂ emissions shall not exceed 0.50 lb/MMBtu when using No. 2 fuel oil.

Applicable Compliance Method:

If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

n. Emission Limitation:

SO₂ emissions shall not exceed 0.002 lb/MMBtu when using natural gas.

If required, sulfur dioxide emissions shall be determined according to test Methods 1 - 4, and 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

o. Emission Limitation:

PE shall not exceed 0.02 lb/MMBtu when using either natural gas or No. 2 fuel oil.

Applicable Compliance Methods:

If required, particulate emissions shall be determined according to test Methods 1 - 5, as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with ORC 3704.03(F)(4)(b) ["Review of New Sources of Air Toxics Emissions, Option A."] was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.