



Environmental
Protection Agency

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

8/9/2010

Mr. Ray Braun
University Hospital Health System dba Ahuja Medical Cen
3999 Richmond Rd.
Beachwood, OH 44122

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1318028709
Permit Number: P0106451
Permit Type: Initial Installation
County: Cuyahoga

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 Plain Dealer. 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 Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114

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 Cleveland Division of Air Quality at (216)664-2297.

Sincerely,


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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
CDAQ; Pennsylvania; Canada

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
University Hospital Health System dba Ahuja Medical Cen

Issue Date: 8/9/2010

Permit Number: P0106451

Permit Type: Initial Installation

Permit Description: This Permit to Install and Operate is being applied for the installation and operation of four 12.55 mmBtu/hr natural gas-fired boilers with No. 2 Fuel Oil as a backup fuel for no more than 500 hours per rolling 12 - month period for each boiler.

Facility ID: 1318028709

Facility Location: University Hospital Health System dba Ahuja Medical Cen
3999 Richmond Rd.,
Beachwood, OH 44122

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 David Hearne at Cleveland Division of Air Quality, 2nd Floor 75 Erieview Plaza, Cleveland, OH 44114 or (216)664-2297. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



Permit Strategy Write-Up

1. Check all that apply:

[x] Synthetic Minor Determination

[] Netting Determination

2. Source Description:

This Permit to Install and Operate is being applied for the installation and operation of four (4) 12.6 mmBtu/hr natural gas-fired boilers with No. 2 Fuel Oil as a backup fuel for no more than 500 hours per rolling 12-month period for each boiler.

3. Facility Emissions and Attainment Status:

Table with 6 columns: Emissions Unit, NOx, CO, VOC, PM10/PM2.5, SO2. Rows include Boiler #1-4, Emergency Generator #1-2, and a Total row.

The facility is in Cuyahoga County which is in attainment for all pollutants except PM2.5.

4. Source Emissions:

Table with 6 columns: Emissions Unit, NOx, CO, VOC, PM10/PM2.5, SO2. Rows include Boiler #1-4 and a Total row.

5. Conclusion:

The permit has been written to keep total emissions under 100 tons/year and to only allow the burning of No. 2 Fuel Oil up to 500 hours/year.

6. Please provide additional notes or comments as necessary:

None

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

<u>Pollutant</u>	<u>Tons Per Year</u>
NOx	28.12
CO	33.12
VOC	3.64
PM ₁₀ /PM _{2.5}	2.48
SO ₂	6.48



DRAFT

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

University Hospital Health System dba Ahuja Medical Cen

Facility ID: 1318028709
Permit Number: P0106451
Permit Type: Initial Installation
Issued: 8/9/2010
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
University Hospital Health System dba Ahuja Medical Cen

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Authorization

Facility ID: 1318028709
Application Number(s): A0039041
Permit Number: P0106451
Permit Description: This Permit to Install and Operate is being applied for the installation and operation of four 12.55 mmBtu/hr natural gas-fired boilers with No. 2 Fuel Oil as a backup fuel for no more than 500 hours per rolling 12 - month period for each boiler.
Permit Type: Initial Installation
Permit Fee: \$1,600.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 8/9/2010
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:

University Hospital Health System dba Ahuja Medical Cen
3999 Richmond Rd.
Beachwood, OH 44122

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:

Cleveland Division of Air Quality
2nd Floor
75 Erieview Plaza
Cleveland, OH 44114
(216)664-2297

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: P0106451
Permit Description: This Permit to Install and Operate is being applied for the installation and operation of four 12.55 mmBtu/hr natural gas-fired boilers with No. 2 Fuel Oil as a backup fuel for no more than 500 hours per rolling 12 - month period for each boiler.

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

Group Name: Boilers

Table with 2 columns: Emissions Unit ID and details (Company Equipment ID, Superseded Permit Number, General Permit Category and Type). Rows include units B003, B004, B005, and B006.



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 Cleveland Division of Air Quality 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

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.

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group - Boilers: B003, B004, B005, B006,

Table with 2 columns: EU ID, Operations, Property and/or Equipment Description. Rows include B003, B004, B005, B006 with descriptions of Cleaver-Brooks 12.6 mmBtu/hr natural gas-fired boilers.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. See b)(1)c., c)(3), d)(2), e)(5), and f)(1)f.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Table with 2 columns: Applicable Rules/Requirements, Applicable Emissions Limitations/Control Measures. Row a: OAC rule 3745-31-05(A)(3), as effective 11/30/01. Measures include limits for Particulate emissions (PE), Volatile Organic Compound (VOC), Nitrogen oxides (NOx), and Carbon monoxide (CO).

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>NO_x emissions shall not exceed 3.15 lbs/hr and 0.79 TPY.</p> <p>SO₂ emissions shall not exceed 6.30 lbs/hr.</p> <p>The requirements of this rule also include compliance with the requirements of OAC rule 3475-31-05(D).</p> <p>See b)(2)b.</p>
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See b)(2)c.
c.	OAC rule 3745-31-05(D) Synthetic minor to avoid Title V	<p>When burning No. 2 Fuel Oil: SO₂ emissions shall not exceed 1.58 tons per rolling 12-month period.</p> <p>See c)(3).</p>
d.	OAC rule 3745-31-05(F)	<p>When Burning Natural Gas:</p> <p>Particulate emissions (PE) shall not exceed 0.57 tons per year TPY.</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 0.88 TPY.</p> <p>Nitrogen oxides (NO_x) emissions shall not exceed 6.61 TPY.</p> <p>Carbon monoxide (CO) emissions shall not exceed 8.28 TPY.</p> <p>When Burning No. 2 Fuel Oil NO_x emissions shall not exceed 0.79 TPY.</p>
e.	OAC rule 3745-17-07(A)(1)	The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 40 CFR Part 60 Subpart Dc.
f.	OAC rule 3745-17-10(B)(1)	0.02 lb of particulate emissions per mmBtu
g.	OAC rule 3745-18-06(D)	When burning No. 2 fuel oil, the emissions limitation specified by this rule

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		is less stringent than the emission limitation established pursuant to 40 CFR Part 60 Subpart Dc.
h.	40 CFR Part 60 Subpart Dc	0.50 lb of SO ₂ emissions per mmBtu when burning No. 2 fuel oil. Visible particulate emissions from any stack shall not exceed 10% opacity, as a six-minute average, except for one 6-minute period per hour of not more than 27% opacity.

(2) Additional Terms and Conditions

- a. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United State Environmental Protection Agency (U.S. EPA), 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency (Ohio EPA).
- b. 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 changes). Such that BAT is no longer required by State regulations for NAAQS pollutant 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.
- c. 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.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, VOC, NO_x, CO, or SO₂ emissions from this air contaminant source since the uncontrolled potential to emit for PE, VOC, and CO emissions is less than 10 tons per year, and the calculated annual emission rate for NO_x and SO₂ is less than 10 tons per year taking into account the federally enforceable restriction of 500 hours per year maximum annual operating hours for this emissions unit while burning No. 2 fuel oil.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas and/or No. 2 fuel oil in this emissions unit.

- (2) The quality of No. 2 fuel oil received for burning in this emissions unit shall have a combination of sulfur content and heat content sufficient to comply with the allowable sulfur dioxide emission limitation of 0.50 lb/mmBtu of actual heat input and the sulfur content limitation for No. 2 fuel oil of less than or equal to 0.5 weight per cent sulfur.
- (3) The maximum annual operating hours for this emissions unit while burning No. 2 fuel oil shall not exceed 500 hours/year, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Operating Hours
1	500
1-2	500
1-3	500
1-4	500
1-5	500
1-6	500
1-7	500
1-8	500
1-9	500
1-10	500
1-11	500
1-12	500

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

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

- (1) The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil consistent with the requirements in 40 CFR §60.48c(f) and maintain records of the total quantity of oil received, the permittee's or oil supplier's analysis for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lb/mmBtu). [The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)]. A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lb/mmBtu). [The sulfur dioxide rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)].

c. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the director.

(2) The permittee shall maintain monthly records for the following information:

- a. The total hours of operation of the emissions unit while burning No. 2 fuel oil for each month; and
- b. Beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the operating hours while burning No. 2 fuel oil.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative operating hours while burning No. 2 fuel oil for each calendar month.

e) Reporting Requirements

- (1) 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. Date actual construction commenced (no later than 30 days after such date); and
- b. Actual start-up date (within 15 days after such date).

Reports are to be sent to the CDAQ and to:

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

- (2) The permittee shall notify the Cleveland Division of Air Quality (DAQ) in writing of any fuel burned in this emissions unit other than natural gas or No. 2 fuel oil.
 - (3) The permittee shall notify the Cleveland DAQ in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation and/or sulfur content limitation based upon the record keeping requirements from term d)(1) above.
 - (4) The notifications identified in terms e)(1) and e)(2) shall include a copy of such record and shall be submitted to the Cleveland DAQ within 45 days after the deviation occurs.
 - (5) The permittee shall submit quarterly deviation (excursion) reports to the Cleveland DAQ which identify all exceedances of the rolling, 12-month limitation on the hours of operation while burning No.2 fuel oil; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation.
 - (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.
 - (7) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation(s):
0.13 lb/hr and 0.57 TPY of particulate emissions (PE) when burning natural gas

Applicable Compliance Method:
Compliance with the lb/hr emission limitation may be determined by multiplying the lb/mmBtu emission factor of 0.01 lb PE/mmBtu (taken from manufacturer Clever-Brook) by 12.6 mmBtu/hr.

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

The annual limit is based on the allowable hourly emission limit multiplied by the maximum operating hours in a year (8760), divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- b. Emission Limitations(s):
0.20 lb/hr and 0.88 TPY of Volatile Organic Compound (VOC) when burning natural gas

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be determined by multiplying the lb/mmBtu emission factor of 0.016 lb VOC/mmBtu (taken from manufacturer Clever-Brooks) by 12.6 mmBtu/hr.

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 25.

The annual limit is based on the allowable hourly emission limit multiplied by the maximum operating hours in a year (8760), divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- c. Emission Limitation(s):
1.51 lbs/hr and 6.61 TPY of Nitrogen oxides (NOx) when burning natural gas

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be determined by multiplying the lb/mmBtu emission factor of 0.12 lb NOx/mmBtu (taken from manufacturer Clever-Brooks) by 12.6 mmBtu/hr.

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 7.

The annual limit is based on the allowable hourly emission limit multiplied by the maximum operating hours in a year (8760), divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- d. Emission Limitation(s):
1.89 lbs/hr and 8.28 TPY of Carbon Monoxide (CO) when burning natural gas

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be determined by multiplying the lb/mmBtu emission factor of 0.15 lb CO/mmBtu (taken from manufacturer Clever-Brooks) by 12.6 mmBtu/hr.

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

The annual limit is based on the allowable hourly emission limit multiplied by the maximum operating hours in a year (8760), divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- e. Emission Limitation(s):
3.15 lbs/hr and 0.79 TPY of Nitrogen Oxide (NOx) when burning No. 2 fuel oil

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be determined by multiplying the lb/mmBtu emission factor of 0.25 lb NOx/mmBtu (taken from manufacturer Clever-Brooks) by 12.6 mmBtu/hr.

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 7.

The annual limit is based on the allowable hourly emission limit (3.15 lbs/hr) multiplied by the maximum allowable operating hours (500 hrs/yr), divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation and operating hour limits, compliance will also be shown with the annual limitation.

- f. Emission Limitation(s):
6.30 lbs/hr and 1.58 TPY of Sulfur Dioxide (SO₂) when burning No. 2 fuel oil

Applicable Compliance Method:

Compliance with the lb/hr emission limitation may be determined by multiplying the lb/mmBtu emission factor of 0.50 lb SO₂/mmBtu (taken from manufacturer Clever-Brooks) by 12.6 mmBtu/hr.

If required, the permittee shall demonstrate compliance with the lb/hr emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4, and 6.

The annual limit is based on the allowable hourly emission limit (6.30 lbs/hr) multiplied by the maximum allowable operating hours (500 hrs/yr), divided by 2,000 (lbs/ton). Therefore, provided compliance is shown with the hourly limitation and operating hour limits, compliance will also be shown with the annual limitation.

- g. Emission Limitation(s):
Visible particulate emissions from any stack shall not exceed 10% opacity, as a six-minute average, except for one 6-minute period per hour of not more than 27% opacity.

Applicable Compliance Method(s):

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

- g) Miscellaneous Requirements
 - (1) None.