



Environmental
Protection Agency

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

8/31/2010

Certified Mail

Marc Divis
City of Akron Steam Generating
226 Opportunity Parkway
Akron, OH 44307-2232

Yes	TOXIC REVIEW
Yes	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
Yes	CEMS
Yes	MACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTA
Facility ID: 1677010757
Permit Number: P0106751
Permit Type: OAC Chapter 3745-31 Modification
County: Summit

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install 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, Akron Beacon Journal. 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 Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308

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 Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,


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

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



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description: This permit consists of three (3) 180 mmBtu waste-to-energy boilers (B003 - B005).

3. Facility Emissions and Attainment Status: The facility is considered a major source.

4. Source Emissions: Boilers B003 and B004 burn a combination of shredded tires and wood. B005 burns waste oil. Emissions from these sources trigger PSD permitting requirements.

5. Conclusion: n/a

6. Please provide additional notes or comments as necessary:

This PTI was submitted by the City of Akron to comply with a Director's Final Findings and Orders issued on July 07, 2010 to have a PTI issued in the name of the City of Akron for emission units that the previous operator is no longer operating.

PTIs were originally granted to Akron Thermal as PTI 16-02294 for B003/B004 and 16-02187 for B005.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
SO2	135.5
PM10	36.22
NOx	130.24
CO	56.25
OC	1.58

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install
City of Akron Steam Generating

Issue Date: 8/31/2010
Permit Number: P0106751
Permit Type: OAC Chapter 3745-31 Modification
Permit Description: Steam Generating Boilers
Facility ID: 1677010757
Facility Location: City of Akron Steam Generating
226 Opportunity Parkway,
Akron, OH 44307-2232
Facility Description: Steam and Air-Conditioning Supply

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 permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. 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 Sean Vadas at Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308 or (330)375-2480. The permit can be downloaded from the Web page: www.epa.ohio.gov/dapc



DRAFT

Division of Air Pollution Control
Permit-to-Install
for
City of Akron Steam Generating

Facility ID: 1677010757
Permit Number: P0106751
Permit Type: OAC Chapter 3745-31 Modification
Issued: 8/31/2010
Effective: To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
City of Akron Steam Generating

Table of Contents

Authorization 1
A. Standard Terms and Conditions 3
1. Federally Enforceable Standard Terms and Conditions 4
2. Severability Clause 4
3. General Requirements 4
4. Monitoring and Related Record Keeping and Reporting Requirements 5
5. Scheduled Maintenance/Malfunction Reporting 6
6. Compliance Requirements 6
7. Best Available Technology 7
8. Air Pollution Nuisance 7
9. Reporting Requirements 7
10. Applicability 8
11. Construction of New Sources(s) and Authorization to Install 8
12. Permit-To-Operate Application 9
13. Construction Compliance Certification 9
14. Public Disclosure 10
15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations 10
16. Fees 10
17. Permit Transfers 10
18. Risk Management Plans 10
19. Title IV Provisions 10
B. Facility-Wide Terms and Conditions 11
C. Emissions Unit Terms and Conditions 13
1. B005, Boiler #3 14
2. Emissions Unit Group - waste to energy boilers: B003, B004, 31



Authorization

Facility ID: 1677010757
Facility Description: Steam and Air Conditioning Supply.
Application Number(s): A0039796
Permit Number: P0106751
Permit Description: Steam Generating Boilers
Permit Type: OAC Chapter 3745-31 Modification
Permit Fee: \$3,000.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 8/31/2010
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

City of Akron Steam Generating
226 Opportunity Parkway
Akron, OH 44307-2232

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director



Authorization (continued)

Permit Number: P0106751
Permit Description: Steam Generating Boilers

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

Emissions Unit ID: B005
Company Equipment ID: Boiler #3
Superseded Permit Number: 16-02187
General Permit Category and Type: Not Applicable

Group Name: waste to energy boilers

Emissions Unit ID:	B003
Company Equipment ID:	Boiler #1
Superseded Permit Number:	16-02294
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B004
Company Equipment ID:	Boiler #2
Superseded Permit Number:	16-02294
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

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

Effective Date: To be entered upon final issuance

- b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Akron Regional Air Quality Management District.

Effective Date: To be entered upon final issuance

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Akron Regional Air Quality Management District. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
 - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Akron Regional Air Quality Management District every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
 - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

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

6. Compliance Requirements

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

Effective Date: To be entered upon final issuance

- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- d) The permittee shall submit progress reports to the Akron Regional Air Quality Management District concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

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

8. Air Pollution Nuisance

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

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Akron Regional Air Quality Management District.

Effective Date: To be entered upon final issuance

- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Akron Regional Air Quality Management District. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. **Applicability**

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

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

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

Effective Date: To be entered upon final issuance

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" 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).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

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

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

Effective Date: To be entered upon final issuance

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

14. Public Disclosure

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

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

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

16. Fees

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

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

18. Risk Management Plans

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

19. Title IV Provisions

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

B. Facility-Wide Terms and Conditions

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.
2. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

C. Emissions Unit Terms and Conditions

1. B005, Boiler #3

Operations, Property and/or Equipment Description:

Unit 3 - 180mmBtu/hr boiler

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) b)(1)h., d)(8) - d)(11), and e)(7).
- 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)	<p>When burning natural gas or No. 2 fuel oil, particulate emissions (PE) shall not exceed 0.020 pound per million Btu of actual heat input.</p> <p>When burning a combination of natural gas, No. 2 fuel oil, and/or on-specification used oil, PE shall not exceed 0.11 pound per million Btu of actual heat input, 19.8 pounds per hour, and 86.72 tons per year.</p> <p>Nitrogen oxides (NOx) emissions shall not exceed 70.3 pounds per hour and 307.9 tons per year.</p> <p>Sulfur dioxide (SO2) emissions shall not exceed 101 pounds per hour.</p> <p>Carbon monoxide (CO) emissions shall not exceed 27.0 pounds per hour and 118.3 tons per year.</p> <p>Organic compound (OC) emissions shall not exceed 42 pounds per hour and 183.96 tons per year.</p> <p>Lead (Pb) emissions shall not exceed 0.0843 pounds per hour and 0.4 ton per</p>

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>year.</p> <p>Visible PE shall not exceed 20% opacity, as a 6-minute average, except during periods of startup, shutdown or malfunction.</p> <p>See c)(2) and c)(3).</p>
b.	OAC rule 3745-31-05(D)	<p>The permittee shall only burn natural gas, No. 2 fuel oil, on-specification used oil or a combination of these fuels in this emissions unit.</p> <p>The permittee shall burn no more than 1,000,000 gallons of on-specification used oil in this emissions unit per rolling, 12-month period.</p> <p>SO2 emissions shall not exceed 48.5 tons per rolling, 12-month period.</p>
c.	OAC rule 3745-17-07(A)	The visible PE limitation specified in this rule is equivalent to the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-17-10(B)	When burning natural gas and/or No. 2 fuel oil, the PE limitation specified in this rule is equivalent to the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-10(C)	When burning a combination of natural gas, No. 2 fuel oil, on-specification used oil, the PE limitation specified in this rule is less stringent than the PE limitations established pursuant to OAC rule 3745-31-05(A)(3).
f.	OAC rule 3745-18-06(D)	<p>When burning No. 2 fuel oil, the sulfur dioxide emission limitation specified in this rule is less stringent than the sulfur dioxide emission limitation established pursuant to OAC rule 3745-31-05(A)(3).</p> <p>When burning natural gas, pursuant to OAC rule 3745-18-06(A), this emissions unit is exempt from the emission limitation specified in this rule.</p>
g.	OAC rule 3745-114-01	See d)(8) - d)(11), and e)(7).

(2) Additional Terms and Conditions

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

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

c) Operational Restrictions

- (1) All used oil burned in this emissions unit shall be "on-specification used oil" in accordance with the definitions specified in 40 CFR Part 279 and OAC rule 3745-279-11. On-specification used oil shall not be burned during emissions unit start-ups or shutdowns. On-specification used oil shall not be burned until the emissions unit reaches normal operating temperatures.

All on-specification used oil burned in this emissions unit shall meet the following specifications:

Contaminants/Property	Allowable Specifications
arsenic	5 ppm, maximum
cadmium	2 ppm, maximum
chromium	10 ppm, maximum
lead	100 ppm, maximum
PCB's	50 ppm, maximum
total halogens	4000 ppm, maximum
mercury	1 ppm, maximum
flash point	100 degrees Fahrenheit, minimum
heat content	100,000 Btu/gallon, minimum
sulfur	0.5%, by weight, maximum

Used oil containing more than 1000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under OAC Chapter 3745-279. Therefore, the permittee may receive and burn used oil exceeding 1000 ppm of total halogens (but less than 4000 ppm, maximum) only if the permittee or supplier has demonstrated to the Ohio EPA's Division of Solid and Hazardous Waste Management that the used oil does not contain any hazardous waste.

- (2) In order to avoid applicability of the Prevention of Significant Deterioration rules, the permittee shall restrict the use of fuels burned in this emissions unit in accordance with the following formula:

Effective Date: To be entered upon final issuance

$$\begin{aligned} & \left(\frac{W \text{ gal of No. 2 fuel oil burned}}{\text{rolling, 12 - month period}} \right) \left(\frac{157(S1) \text{ lbs. of SO}_2}{1,000 \text{ gal. of No. 2 fuel oil}} \right) \\ & + \left(\frac{X \text{ gal. of used oil burned}}{\text{rolling 12 - month period}} \right) \left(\frac{157(S2) \text{ lbs. of SO}_2}{1,000 \text{ gal of used oil}} \right) \\ & + \left(\frac{Z \text{ cu. ft natural gas burned}}{\text{rolling, 12 - month period}} \right) \left(\frac{0.6 \text{ lb. of SO}_2}{10^6 \text{ cu. ft of natural gas}} \right) \\ & \leq \left(\frac{97,000 \text{ lbs. of SO}_2}{\text{rolling, 12 - month period}} \right) \end{aligned}$$

Where:

W is the number of gallons of No. 2 fuel oil burned per rolling, 12 -month period;

X is the number of gallons of on - specification used oil burned per rolling, 12 -month period;

Z is the cubic feet of natural gas burned per rolling, 12 -month period;

S1 is the rolling, 12 -month weight percent sulfur in the No. 2 fuel oil; and

S2 is the rolling, 12 -month weight percent sulfur in the on - specification used oil.

The Btu per pound of wood emission factor is based upon wood with a moisture content equal to or greater than 20%.

Should more accurate SO₂ emission factors (in pound per million Btu, pounds per million cubic feet, pounds per thousand gallons,) be developed through emission testing or fuel analyses, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, Akron RAQMD, and the permittee.

- (3) The sulfur content of any oil fired in this emissions unit shall not exceed 0.50 weight percent.
- (4) The permittee shall operate the ESP during any operation of this emissions unit, except the ESP may not be operated during periods of start-up until the exhaust gases have achieved a temperature of 250 degrees Fahrenheit at the inlet of the ESP or during periods of shutdown when the temperature of the exhaust gases has dropped below 250 degrees Fahrenheit at the inlet of the ESP, and when combusting natural gas.

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

- (2) In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average total combined power input (in kilowatts) to all fields of the ESP, for any 3-hour block of time when the emissions unit is in operation and combusting any fuel other than natural gas, shall be no less than 90 percent of the total combined power input, as a 3-hour average, measured during the most recent emissions test that demonstrated the emissions unit was in compliance with the particulate emission limitation.

Effective Date: To be entered upon final issuance

- (3) The permittee shall properly install, operate, and maintain equipment to monitor and record the following on an hourly basis when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown:
- a. the secondary voltage, in kilovolts, and the secondary current in amps, for each transformer rectifier (TR) set in the ESP;
 - b. the power input (in kilowatts) of each TR set for each hour (calculated by multiplying the secondary voltage (in kilovolts) by the secondary current (in amps) for each TR set) for each of the fields within the ESP; and
 - c. the total power input to the ESP for each hour (add together the power inputs for the TR sets operating during the hour).

The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Whenever the monitored/calculated values deviate from the minimum limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- a. the date and time the deviation began;
- b. the magnitude of the deviation at that time;
- c. the date the investigation was conducted;
- d. the name(s) of the personnel who conducted the investigation; and
- e. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) or at/above the minimum voltage and current limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- a. a description of the corrective action;
- b. the date the corrective action was completed;
- c. the date and time the deviation ended;
- d. the total period of time (in minutes) during which there was a deviation;
- e. the secondary voltage and current readings for each field immediately after the corrective action; and

Effective Date: To be entered upon final issuance

- f. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The current minimum power input limit for the ESP is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the minimum power input limit based upon information obtained during future tests that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to these range(s) or minimum voltage and current limit(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

- (3) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the quantity of No. 2 fuel oil burned, in gallons;
 - b. the quantity of on-specification used oil burned, in gallons;
 - c. the quantity of natural gas burned, in cubic feet;
 - d. the rolling, 12-month summation of each fuel used;
 - e. the SO₂ emissions, in pounds and tons;
 - f. the rolling, 12-month summation of the SO₂ emissions, in tons;
 - g. the total operating hours for this emissions unit; and
 - h. the average SO₂ emission rate, in pounds per hour (i.e., (f)/(g)).

- (4) The permittee shall receive a chemical analysis with each shipment of on-specification used oil from the supplier. The analysis shall identify the name and address of the supplier, the supplier's USEPA identification number, and the following information:
 - a. date of shipment or delivery;
 - b. quantity of used oil received;
 - c. the Btu value of the used oil;
 - d. the flash point of the used oil;
 - e. the arsenic content;
 - f. the cadmium content;
 - g. the chromium content;

- h. the lead content;
- i. the PCB content;
- j. the total halogen content;
- k. the mercury content; and
- l. the sulfur content.

The Director or any authorized representative of the Director may require or may conduct periodic, detailed chemical analyses through an independent laboratory of any used oil shipment received by the facility, of any used oil stored at this facility, or of any used oil sampled at the emissions unit.

The permittee shall conduct or have performed an analysis of a representative sample of used oil from any used oil storage tank located at the facility on an annual basis. The analysis shall be performed to determine conformance with the contaminant specifications identified in c)(1).

- (5) For each shipment of No. 2 fuel oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO₂ emission rate (in lbs/mmBtu). (The SO₂ emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).)

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of No. 2 fuel oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Akron RAQMD.

- (6) The permittee shall operate and maintain equipment to continuously monitor and record the opacity of the PE from this emissions unit when combusting fuels other than natural gas. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

Each continuous emission monitoring system consists of all the equipment used to acquire data and includes the data recording/processing hardware and software.

The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 1-minute, 6-minute block, and hourly average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

Effective Date: To be entered upon final issuance

- (7) The permittee shall operate and maintain a temperature monitor and recorder that measures and records the temperature of the boiler exhaust gases entering the ESP as follows:
- a. during all periods of start-up until the ESP is operational or until the inlet temperature of the ESP achieves 250 degrees Fahrenheit; and
 - b. during all periods of shutdown until the inlet temperature to the ESP drops below 250 degrees Fahrenheit.

The temperature monitor and recorder shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the emissions unit exhaust gases in degrees Fahrenheit.

- (8) The permit-to-install (PTI) application for this emissions unit B005 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices";
or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
 - b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
 - c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days

Effective Date: To be entered upon final issuance

per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Pollutant: lead
TLV (ug/m3): 50
Maximum Hourly Emission Rate (lbs/hr): 0.525
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.3204
MAGLC (ug/m3): 1.19

Pollutant: arsenic
TLV (ug/m3): 10
Maximum Hourly Emission Rate (lbs/hr): 0.102
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.0621
MAGLC (ug/m3): 0.24

Pollutant: cadmium
TLV (ug/m3): 10
Maximum Hourly Emission Rate (lbs/hr): 0.102
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.0625
MAGLC (ug/m3): 0.24

Pollutant: chromium
TLV (ug/m3): 10
Maximum Hourly Emission Rate (lbs/hr): 0.104
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.0636
MAGLC (ug/m3): 0.24

Pollutant: cobalt
TLV (ug/m3): 20
Maximum Hourly Emission Rate (lbs/hr): 0.0000
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.0001
MAGLC (ug/m3): 0.48

Pollutant: manganese
TLV (ug/m3): 200
Maximum Hourly Emission Rate (lbs/hr): 0.04
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.024
MAGLC (ug/m3): 4.76

Pollutant: mercury
TLV (ug/m3): 10
Maximum Hourly Emission Rate (lbs/hr): 0.086
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.0521

Effective Date: To be entered upon final issuance

MAGLC (ug/m3): 0.24

Pollutant: nickel

TLV (ug/m3): 100

Maximum Hourly Emission Rate (lbs/hr): 0.063

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.0388

MAGLC (ug/m3): 2.38

Pollutant: hydrogen chloride

TLV (ug/m3): 5,496

Maximum Hourly Emission Rate (lbs/hr): 127.4

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 77.73

MAGLC (ug/m3): 130.87

Pollutant: PCB

TLV (ug/m3): 500

Maximum Hourly Emission Rate (lbs/hr): 0.011

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.0068

MAGLC (ug/m3): 11.90

The permittee, has demonstrated that emissions of the individual toxic contaminant(s) modeled, pursuant to OAC 3745-114-01, from emissions unit(s) B005, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

- (9) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration", the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a

Effective Date: To be entered upon final issuance

“modification”, the permittee shall apply for and obtain a final PTI, PTIO, or FEPTIO (as applicable) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

(10) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):

- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
- b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);
- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
- d. the documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

(11) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (2) The permittee shall notify the USEPA and the Ohio EPA in writing if on-specification used oil, which exceeds the specifications in c)(1), is burned in this emissions unit. The notification shall include a copy of the on-specification used oil analysis and shall be sent to the USEPA and the Ohio EPA within 30 days of the exceedance.
- (3) The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The total quantity of oil in each shipment and the calculated SO₂ emission rate for each shipment of oil shall also be included with the copies of the permittee's or oil supplier's analyses.

Effective Date: To be entered upon final issuance

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the No. 2 fuel oil shipments received during the previous calendar quarters.

- (4) The permittee shall submit reports (hardcopy or electronic format) within 30 days following the end of each calendar quarter to the Akron RAQMD documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line and combusting any fuel other than natural gas (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunction. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

- (5) The permittee shall submit deviation (excursion) reports that identify the following:
- a. all exceedances of the rolling, 12-month limitation for on-specification used oil;
 - b. all exceedances of the rolling, 12-month limitation for SO₂;
 - c. all exceedances of the fuel oil sulfur content restriction;

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

- (6) The permittee shall submit quarterly reports that specify the total quantity of each fuel combusted in this emissions unit for each calendar month during the calendar quarter. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.
- (7) The permittee shall also submit annual reports that specify the total NO_x, CO, OC and Pb emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by

Effective Date: To be entered upon final issuance

including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

- (8) The permittee shall submit deviation (excursion) reports which identify:
- a. all periods of time during start-up and shutdown of the emissions unit when the ESP was not in operation and the temperature of the emissions unit exhaust gases exceeded the temperature levels specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b)(i);
 - b. all periods in which the TDF usage exceeded 11% TDF by weight and the actual composition for that time period;
 - c. for each field of the ESP, each period of time (start time and date, and end time and date) when the field was not operating within the acceptable range(s) or at or above the minimum limit(s) for the secondary voltage and current;
 - d. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the ESP;
 - e. each incident of deviation described in "c" or "d" (above) where a prompt investigation was not conducted;
 - f. each incident of deviation described in "c" or "d" where prompt corrective action, that would bring the ESP into compliance with the acceptable range(s) or limit(s) for the power input, was determined to be necessary and was not taken; and
 - g. each incident of deviation described in "c" or "d" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (9) 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) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. The emission testing shall be conducted within 3 months after start-up.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for PE, NO_x, OC, SO₂, and CO. The emission testing shall be conducted while the emissions unit is combusting the worst case fuel for each pollutant.
 - c. The following test methods shall be employed to demonstrate compliance with the following allowable emission limitations:

for PE, Methods 1 through 5 of 40 CFR Part 60, Appendix A;

Effective Date: To be entered upon final issuance

for NO_x, Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A;

for OC, Methods 1 through 4 and 25 of 40 CFR Part 60, Appendix A;

for CO, Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A; and

for SO₂, Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- d. The emission tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Akron RAQMD's refusal to accept the results of the emission test(s).

Personnel from the Akron RAQMD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Akron RAQMD within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Akron RAQMD.

- (2) Compliance with the emission limitations in Section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitations:

When burning a combination of natural gas, No. 2 fuel oil, on-specification used oil, PE shall not exceed 0.11 pound per million Btu of actual heat input, 19.8 pounds per hour, and 86.72 tons per year.

Applicable Compliance Method:

Compliance with the pound per million Btu and pounds per hour emission limitations shall be determined through the results of the emission testing requirements specified in Section f)(1).

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by 2000.

Effective Date: To be entered upon final issuance

Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is maintained.

b. Emission Limitation:

When burning natural gas or No. 2 fuel oil, PE shall not exceed 0.020 pound per million Btu of actual heat input.

Applicable Compliance Method:

When burning natural gas, compliance with this emission limitation may be determined by dividing an emission factor of 1.9 pounds of PE (filterable) per million standard cubic feet by the heating value of the natural gas (1020 Btu/standard cu. ft.). This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

When burning No. 2 fuel oil, compliance may be determined by multiplying an emission factor of 2.0 pounds of PE per thousand gallons of oil fired by the emissions unit's maximum hourly fuel oil firing capacity (1286 gallons/hr at 140,000 Btu/gal) and dividing by the emissions unit's rated heat input capacity (180 mmBtu/hr).

This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98).

If required, the permittee shall demonstrate compliance with this emission limitation through the results of emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 while burning No. 2 fuel oil.

c. Emission Limitations:

NO_x emissions shall not exceed 70.3 pounds per hour and 307.9 tons per year.

Applicable Compliance Method:

Compliance with the pounds per hour emission limitation shall be determined through the results of the emission testing requirements specified in Section f.1.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by 2000. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is maintained.

d. Emission Limitation:

SO₂ emissions shall not exceed 101 pounds per hour.

Applicable Compliance Method:

The permittee may demonstrate compliance with this emission limitation based upon the records required pursuant to Section d)(3) and through the results of emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 while burning on-specification used oil.

e. Emission Limitations:

CO emissions shall not exceed 27.0 pounds per hour and 118.3 tons per year.

Applicable Compliance Method:

Compliance with the pounds per hour emission limitation shall be determined through the results of the emission testing requirements specified in Section f)(1).

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by 2000. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is maintained.

f. Emission Limitations:

OC emissions shall not exceed 42 pounds per hour and 183.96 tons per year.

Applicable Compliance Method:

Compliance with the pounds per hour emission limitation shall be determined through the results of the emission testing requirements specified in Section f)(1).

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by 2000. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is maintained.

g. Emission Limitations:

Pb emissions shall not exceed 0.0843 pound per hour and 0.4 ton per year.

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying an emission factor of $55 \cdot L$ pound(s) per thousand gallons of on-specification used oil burned (L = maximum lead content of fuel in wt%) by the emissions unit's maximum hourly on-specification used oil firing capacity (1286 gallons/hr at 140,000 Btu/gal) and applying the ESP emission reduction factor determined during the most recent emission tests that demonstrated the emissions unit was in compliance. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.11, Table 1.11-1 (10/96).

Effective Date: To be entered upon final issuance

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by 2000. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is maintained.

If required, the permittee shall demonstrate compliance with this emission limitation through the results of emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 12 or 29.

h. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, except during periods of startup, shutdown or malfunction.

Applicable Compliance Method:

If required, compliance with the visible PE limitation shall be demonstrated through the results of visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9.

i. Emission Limitation:

SO₂ emissions shall not exceed 48.5 tons per rolling, 12-month period.

Applicable Compliance Method:

The permittee shall demonstrate compliance with this emission limitation based upon the records required pursuant to Section d)(3).

g) Miscellaneous Requirements

- (1) The permittee shall maintain a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
- (2) This emissions unit is no longer capable of combusting solid fuels such as wood due to a change made to the material handling system that serves this emissions unit.

Effective Date: To be entered upon final issuance

2. Emissions Unit Group - waste to energy boilers: B003, B004,

EU ID	Operations, Property and/or Equipment Description
B003	180 mmBtu/hr waste to energy boiler
B004	180 mmBtu/hr waste to energy boiler

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) b)(1)i., d)(8) – d)(11), and e)(13).
- 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)	<p>When burning natural gas exclusively, particulate emissions (PE) shall not exceed 0.02 lb/mmBtu of actual heat input.</p> <p>When burning a combination of the following fuels: natural gas, TDF and/or wood, PE shall not exceed 0.08 lb/mmBtu of actual heat input, and 14.4 lbs/hr of PE;</p> <p>nitrogen oxides (NO_x) emissions shall not exceed 0.24 lb/mmBtu of actual heat input, and 43.2 lbs/hr;</p> <p>sulfur dioxide (SO₂) emissions shall not exceed 0.28 lb/mmBtu of actual heat input, and 50.4 lbs/hr;</p> <p>carbon monoxide (CO) emissions shall not exceed 18.0 lbs/hr;</p> <p>organic compounds (OC) emissions shall not exceed 0.36 lb/hr and 1.58 tpy of OC;</p> <p>hydrogen chloride (HCl) emissions shall not exceed 0.09 lb/mmBtu,</p>

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>16.2 lb/hr and 19.87 tpy of HCl;</p> <p>sulfuric acid mist emissions shall not exceed 0.053 lb/mmBtu of actual heat input input, and 9.56 lbs/hr; and,</p> <p>See b)(2)d.</p> <p>Visible PE shall not exceed 20% opacity, as a 6-minute average,(except for one 6-minute period per hour of not more than 27% opacity).</p> <p>See c)(1).</p> <p>Maximum hourly TDF and wood usages shall be limited by the equation found in section c)(2) and a limitation of no more than 3,220 lbs of TDF burned per hour.</p>
b.	OAC rule 3745-17-07(A)	See b)(2)a.
c.	OAC rule 3745-17-10(B)	Applicable PE rule when burning natural gas, see, b)(2)a.
d.	OAC rule 3745-18-06(D)	Applicable SO ₂ rule when burning natural gas, see b)(2)a.
f.	40 CFR 60, Subpart Db	See b)(2)a. and b)(2)c.
g.	OAC rule 3745-31-(13) thru (20)	<p>The tons of emissions per rolling, 12-month period [for emissions units B003 and B004, combined] shall not exceed the following:</p> <p>SO₂ - 135.5 sulfuric acid mist - 23.4.</p> <p>See b)(2)e. below.</p>
h.	OAC rule 3745-31-05(D)	This emissions unit is limited to burning natural gas, TDF, and/or wood (as described in c(2)), or a combination of these fuels. The amount of these fuels for emissions units B003 and B004 is limited by the equations found in c)(2) and limitations of no more than 8,655 tons of TDF and no more than

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>106,818 tons of wood burned per rolling, 12-month period.</p> <p>36.22 tons of particulate matter (PM)* per Rolling, 12-month period for emissions units B003 and B004, combined.</p> <p>130.24 tons of NO_x per rolling, 12-month period for emissions units B003 and B004, combined.</p> <p>56.29 tons of CO per rolling, 12-month period for emissions units B003 and B004, combined.</p> <p>See b)(2)b. below.</p> <p>The annual capacity factor for natural gas shall be limited to 10 percent (0.10) or less for this emissions unit per rolling, 12-month period.</p> <p>*All particulate matter less than 10 microns (PM₁₀) is considered to be PM.</p>
i.	OAC rule 3745-114-01	See sections d)(8) – d)(11), and e)(13).

(2) Additional Terms and Conditions

- a. The emission limitation established by this rule is less stringent than the emission limitation established by OAC rule 3745-31-05.
- b. Based upon information submitted by the applicant in their permit application, the actual annual emissions for emissions units B003 and B004 based upon years 2001 and 2002 reporting are as follows:
 - PM - 13.76 tpy;
 - NO_x - 91.64 tpy; and
 - CO - 43.10 tpy.
- c. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

Effective Date: To be entered upon final issuance

- d. The hourly mass emission limitations for PE, NO_x, SO₂, CO, HCl, and sulfuric acid mist represent the potentials to emit for the emissions unit . Therefore, the permittee does not need to keep hourly records to show compliance with those emission limitations.

- e. The permittee performed a Best Available Control Technology (BACT) review for SO₂ and sulfuric acid mist. The emission limitations based on the BACT requirements are listed under OAC rule 3745-31-(13) through(20) above. The following determinations have been made for each pollutant:
 - SO₂ - Restricting the amount of TDF burned in this emissions unit; and
 - Sulfuric acid mist - Restricting the amount of TDF burned in this emissions unit.

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

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

c) Operational Restrictions

- (2) The permittee shall not burn any oil in this emissions unit.

Emission, Natural Gas, TDF/Wood Mix, and Wood Burned Restrictions:

In order to avoid applicability of the federal Prevention of Significant Deterioration and state OAC 3745-31-13 thru 20 rules for PM/PM-10, NO_x, and CO, the permittee shall restrict the use of fuels burned in emissions units B003 through B004, combined, by the following formula*:

Effective Date: To be entered upon final issuance

a.

$$\left(\frac{X \text{ lbs of wood burned}}{\text{rolling 12 - month period}}\right)\left(\frac{0.10 \text{ lb of CO}}{10^6 \text{ BTU}}\right)\left(\frac{5500 \text{ BTU}}{\text{lbs of wood}}\right) +$$

$$\left(\frac{Y \text{ lbs of TDF / wood burned}}{\text{rolling 12 - month period}}\right)\left(\frac{0.08 \text{ lb of CO}}{10^6 \text{ BTU}}\right)\left(\frac{7161 \text{ BTU}}{\text{lbs of TDF / wood}}\right) +$$

$$\left(\frac{Z \text{ CF natural gas burned}}{\text{rolling 12 - month period}}\right)\left(\frac{84 \text{ lbs of CO}}{10^6 \text{ CF of natural gas}}\right) \leq$$

$$\left(\frac{112,580 \text{ lbs of CO}}{\text{rolling 12 - month period}}\right)$$

Where:

X is the pounds of pure wood burned per rolling 12 - month period

Y is the pounds of TDF / wood mix burned per rolling 12 - month period

Z is the cubic feet of natural gas burned per rolling 12 - month period

b. If the rolling, 12-month TDF usage is less than 8,655 tons, the rolling, 12-month wood usage rate is the lesser of 106,818 tons or the amount determined from the following equation:

$$\text{Tons of wood allowed} = 2,463,636 - 276.5 * \text{actual tons of TDF}$$

c. If the maximum hourly TDF usage is less than 3,220 lbs, the maximum hourly wood usage rate is determined from the following equation:

$$\text{Pounds of wood allowed} = 916,364 - 276.5 * \text{actual lbs of TDF}$$

* note that stack testing and/or fuel analysis required in this permit might change the emission factors used to calculate the above PM, NO_x, and CO lbs value based upon a rolling, 12-month period listed above. Should more accurate emission factors be developed, the permittee shall use them, provided the new emission factors are mutually agreeable to the Ohio EPA, Akron RAQMD, and the permittee.

(3) Wood Burned Restrictions:

The permittee shall only burn live tree trimmings and whole, but chipped trees from area land clearing operations. The permittee shall not burn wood or wood waste derived from any manufacturing operations or any other operation which coats, treats, or otherwise contaminates the wood or wood waste.

The permittee shall only burn wet wood that has moisture content of 20% or greater.

(4) ESP Restrictions:

The permittee shall operate the ESP during any operation of this emissions unit, except the ESP may not be operated during periods of start-up until the exhaust gases have

Effective Date: To be entered upon final issuance

achieved a temperature of 250 degrees Fahrenheit at the inlet of the ESP or during periods of shutdown when the temperature of the exhaust gases has dropped below 250 degrees Fahrenheit at the inlet of the ESP, and when combusting natural gas.

(5) Natural Gas Annual Capacity Factor Limitation:

In order to comply with the NO_x lb/mmBtu limitation listed under OAC rule 3745-31-05(A)(5) in term b)(1), the maximum annual natural gas capacity factor for this emissions unit shall not exceed 10 percent, based upon a rolling, 12-month calculation of the annual capacity factor.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall monitor and record the following information on a daily basis:

- a. the tons of wood that was fed to the boiler that day;
- b. the tons of TDF that was fed to the boiler that day;
- c. the natural gas consumption for each day (in million cubic feet); and
- d. the total actual heat input to the emissions unit, calculated as follows:

$$DI = DI_g + DI_w + DI_t$$

DI = Total heat input for each day, mmBtu

DI_g = Daily heat input rate from Gas

DI_w = Daily heat input rate from Wood

DI_t = Daily heat input rate from TDF

When the emissions unit is combusting natural gas, use the following equation to calculate heat input rate:

$$DI_g = (Q_g * GCV_g) / 10^3$$

Where:

DI_g = Daily heat input rate from pipeline natural gas, mmBtu/day.

Q_g = Metered flow rate of gaseous fuel combusted during unit operation, thousand standard cubic feet per day.

GCV_g = Gross calorific value of natural gas, as determined by sampling (for each monthly sample of pipeline natural gas, or as verified by the contractual supplier at least once every month pipeline natural gas is combusted) using ASTM D1826-88, ASTM D3588-91, ASTM D4891-89, GPA Standard 2172-86 "Calculation of Gross Heating Value, Relative Density and Compressibility Factor for Natural Gas Mixtures from Compositional Analysis," or GPA

Effective Date: To be entered upon final issuance

Standard 2261-90 "Analysis for Natural Gas and Similar Gaseous Mixtures by Gas Chromatography," Btu/scf.

10^3 = Conversion of thousand Btu to mmBtu.

When the unit is combusting wood, use the following equation to calculate heat input rate:

$$DI_w = W_w * GCV_w / 10^6$$

Where:

DI_w = Daily heat input rate from wood, mmBtu/day.

V_w = Weight of wood consumed per day, measured in lbs/day

GCV_w = Gross calorific value of wood = 5,500 Btu/lb, or as measured by ASTM D2015 during most recent stack test, Btu/unit mass, in lbs.

10^6 = Conversion of Btu to mmBtu.

When the unit is combusting TDF, use the following equation to calculate heat input rate:

$$DI_t = W_t * GCV_t / 10^6$$

Where:

DI_t = Daily heat input rate from TDF, mmBtu/day.

V_t = Weight of TDF consumed per day, measured in lbs/day

GCV_t = Gross calorific value of TDF = 13,000 Btu/lb, or as measured by ASTM E711 during most recent stack test, Btu/unit mass, in lbs.

10^6 = Conversion of Btu to mmBtu.

(2) Continuous Opacity Monitoring Requirements:

A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

When combusting fuels other than natural gas in this emissions unit, the permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

Effective Date: To be entered upon final issuance

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (one- minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

The continuous emission monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

(3) ESP Requirements:

- a. In order to maintain compliance with the applicable emission limitation(s) contained in this permit, the acceptable average total combined power input (in kilowatts) to all fields of the ESP, for any 3-hour block of time when the emissions unit is in operation and combusting any fuel other than natural gas, shall be no less than 90 percent of the total combined power input, as a 3-hour average, measured during the most recent emissions test that demonstrated the emissions unit was in compliance with the particulate emission limitation.
- b. The permittee shall properly install, operate, and maintain equipment to monitor and record the following on an hourly basis when the controlled emissions unit(s) is/are in operation, including periods of startup and shutdown:
 - i. the secondary voltage, in kilovolts, and the secondary current in amps, for each transformer rectifier (TR) set in the ESP;
 - ii. the power input (in kilowatts) of each TR set for each hour (calculated by multiplying the secondary voltage (in kilovolts) by the secondary current (in amps) for each TR set) for each of the fields within the ESP; and
 - iii. the total power input to the ESP for each hour (add together the power inputs for the TR sets operating during the hour).

The monitoring equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s), with any modifications deemed necessary by the permittee.

Effective Date: To be entered upon final issuance

Whenever the monitored/calculated values deviate from the minimum limit established in accordance with this permit, the permittee shall promptly investigate the cause of the deviation. The permittee shall maintain records of the following information for each investigation:

- i. the date and time the deviation began;
- ii. the magnitude of the deviation at that time;
- iii. the date the investigation was conducted;
- iv. the name(s) of the personnel who conducted the investigation; and
- v. the findings and recommendations.

In response to each required investigation to determine the cause of a deviation, the permittee shall take prompt corrective action to bring the operation of the control equipment within the acceptable range(s) or at/above the minimum voltage and current limit(s) specified in this permit, unless the permittee determines that corrective action is not necessary and documents the reasons for that determination and the date and time the deviation ended. The permittee shall maintain records of the following information for each corrective action taken:

- i. a description of the corrective action;
- ii. the date the corrective action was completed;
- iii. the date and time the deviation ended;
- iv. the total period of time (in minutes) during which there was a deviation;
- v. the secondary voltage and current readings for each field immediately after the corrective action; and
- vi. the name(s) of the personnel who performed the work.

Investigation and records required by this paragraph do not eliminate the need to comply with the requirements of OAC rule 3745-15-06 if it is determined that a malfunction has occurred.

The current minimum power input limit for the ESP is effective for the duration of this permit, unless revisions are requested by the permittee and approved in writing by the appropriate Ohio EPA District Office or local air agency. The permittee may request revisions to the minimum power input limit based upon information obtained during future tests that demonstrate compliance with the allowable particulate emission rate for the controlled emissions unit(s). In addition, approved revisions to these range(s) or minimum voltage and current limit(s) will not constitute a relaxation of the monitoring requirements of this permit and may be incorporated into this permit by means of an administrative modification.

Effective Date: To be entered upon final issuance

- (2) The permittee shall operate and maintain a temperature monitor and recorder that measures and records the temperature of the boiler exhaust gases entering the ESP as follows:
- a. during all periods of start-up until the ESP is operational or until the inlet temperature of the ESP achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i); and
 - b. during all periods of shutdown until the inlet temperature to the ESP drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i).

The temperature monitor and recorder shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the emissions unit exhaust gases in degrees Fahrenheit.

- (3) The permittee shall maintain monthly records of the following information in emissions units B003 - B004, combined:
- a. the pounds of wood burned;
 - b. the pounds of TDF burned;
 - c. the cubic feet of natural gas burned;
 - d. the rolling, 12-month summation of TDF, natural gas and wood used;
 - e. the calculations and the results of the determination that the formulas in term c)(2) were met;
 - f. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the TDF burned ; and
 - g. the rolling, 12-month summation of SO₂ and Sulfuric Acid Mist emission limitations.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative TDF burned for each calendar month.

The permittee shall calculate the annual capacity factor as defined in 40 CFR Part 60.41b individually for each fuel burned each calendar quarter pursuant to 40 CFR Part 60.49b.

The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month.

- (4) The permittee shall monitor steam generating unit operating conditions and predict nitrogen oxides emission rates as specified in section g)(1).
- (5) The permittee shall maintain daily records of the following information for each day:
- a. the pounds of TDF burned; and

Effective Date: To be entered upon final issuance

- b. the pounds of wood burned in conjunction with TDF.
- (6) The permit-to-install (PTI) application for this/these emissions unit(s) B003 – B004 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:
- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
- i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
- ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists' (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X" hours per day and "Y" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Pollutant: Manganese

TLV (mg/m³): 0.2

Effective Date: To be entered upon final issuance

Maximum Hourly Emission Rate (lbs/hr): 0.12

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.022

MAGLC (ug/m3): 0.714

Pollutant: Acrolein

TLV (mg/m3): 0.23

Maximum Hourly Emission Rate (lbs/hr): 0.89

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.167

MAGLC (ug/m3): 4.02

Pollutant: Benzene

TLV (mg/m3): 32

Maximum Hourly Emission Rate (lbs/hr): 0.37

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.070

MAGLC (ug/m3): 37.95

Pollutant: Biphenyl

TLV (mg/m3): 1.3

Maximum Hourly Emission Rate (lbs/hr): 3.31

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.264

MAGLC (ug/m3): 29.97

Pollutant: 1,3-Butadiene

TLV (mg/m3): 4.4

Maximum Hourly Emission Rate (lbs/hr): 1.40

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.264

MAGLC (ug/m3): 105.13

Pollutant: Ethylbenzene

TLV (mg/m3): 434

Maximum Hourly Emission Rate (lbs/hr): 0.37

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.070

MAGLC (ug/m3): 10,316.81

Pollutant: Formaldehyde

TLV (mg/m3): 0.27

Maximum Hourly Emission Rate (lbs/hr): 0.97

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.184

MAGLC (ug/m3): 6.45

Pollutant: Naphthalene

TLV (mg/m3): 52

Maximum Hourly Emission Rate (lbs/hr): 0.37

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.070

MAGLC (ug/m3): 1,245.77

Pollutant: Phenol

TLV (mg/m3): 19

Maximum Hourly Emission Rate (lbs/hr): 0.40

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.075

MAGLC (ug/m3): 457.29

Pollutant: Styrene

TLV (mg/m3): 213

Maximum Hourly Emission Rate (lbs/hr): 0.37

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.070

MAGLC (ug/m3): 2,024.49

Pollutant: Toluene

TLV (mg/m3): 188

Maximum Hourly Emission Rate (lbs/hr): 0.20

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.038

MAGLC (ug/m3): 4,476.68

Pollutant: Sulfuric Acid Mist

TLV (mg/m3): 1

Maximum Hourly Emission Rate (lbs/hr): 19.11

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3.607

MAGLC (ug/m3): 23.81

Pollutant: Hydrogen Chloride

TLV (mg/m3): 5

Maximum Hourly Emission Rate (lbs/hr): 0.86

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.161

MAGLC (ug/m3): 130.60

Pollutant: Lead

TLV (mg/m3): 0.05

Maximum Hourly Emission Rate (lbs/hr): 0.04

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.01

MAGLC (ug/m3): 1.19

Effective Date: To be entered upon final issuance

The permittee, has demonstrated that emissions, from emissions unit(s) B003 – B004, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (7) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration”, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;
 - b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTI, PTIO, or FEPTIO (as applicable) prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (8) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);

Effective Date: To be entered upon final issuance

- c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (9) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (10) The permittee shall operate and maintain equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit when combusting fuels other than natural gas in this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

Each continuous emission monitoring system consists of all the equipment used to acquire data and includes the data recording/processing hardware and software.

The permittee shall maintain a certification letter from the Ohio EPA documenting that the continuous opacity monitoring system has been certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous opacity monitoring system: percent opacity on a 1-minute, 6-minute block, and hourly average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

e) Reporting Requirements

- (1) The permittee shall submit reports within 30 days following the end of each calendar quarter to the Akron Regional Air Quality Management District documenting all instances of opacity values in excess of the limitations specified above, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also document any continuous opacity monitoring system downtime while the emissions unit was on line and combusting a fuel other than natural gas (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total

Effective Date: To be entered upon final issuance

operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

- (2) The permittee shall submit deviation (excursion) reports which identify:
 - a. all periods of time during start-up and shutdown of the emissions unit when the ESP was not in operation and the temperature of the emissions unit exhaust gases exceeded the temperature levels specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b)(i);
 - b. all periods in which the TDF usage exceeded 11% TDF by weight and the actual composition for that time period;
 - c. for each field of the ESP, each period of time (start time and date, and end time and date) when the field was not operating within the acceptable range(s) or at or above the minimum limit(s) for the secondary voltage and current;
 - d. any period of time (start time and date, and end time and date) when the emissions unit(s) was/were in operation and the process emissions were not vented to the ESP;
 - e. each incident of deviation described in "c" or "d" (above) where a prompt investigation was not conducted;
 - f. each incident of deviation described in "c" or "d" where prompt corrective action, that would bring the ESP into compliance with the acceptable range(s) or limit(s) for the power input, was determined to be necessary and was not taken; and
 - g. each incident of deviation described in "c" or "d" where proper records were not maintained for the investigation and/or the corrective action(s), as identified in the monitoring and record keeping requirements of this permit.
- (3) The permittee shall submit quarterly reports which identify the sections of the ESP that were out of service along with the time period(s) involved. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall address the information obtained during the previous calendar quarter.
- (4) The permittee shall submit deviation (excursion) reports which identify all exceedances of rolling, 12-month limitations and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable

Effective Date: To be entered upon final issuance

cumulative amounts of TDF and/or wood burned and PM, NOx, and CO emission levels (compliance with PM, NOx, and CO emissions levels are demonstrated thru the use of the formula described in term c)(2) for emission units B003 - B004.

- (5) The permittee shall submit deviation (excursion) reports which identify all exceedances of rolling, 12-month limitations for SO₂ and sulfuric acid mist.
- (6) The permittee shall submit deviation (excursion) reports that identify all exceedances of the natural gas annual capacity factor limitation and, for the first 12 calendar months of operation following the issuance of the permit, all exceedances of the monthly allowable natural gas capacity factor.
- (7) The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit
- (8) The permittee shall submit quarterly reports which specify the total quantity of each fuel combusted in this emissions unit for each calendar month during the calendar quarter. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall address the data obtained during the previous calendar quarter.
- (9) The permittee shall submit an initial notification of startup. This notification shall include:
 - a. the date of initial startup;
 - b. the design heat input capacity of the facility and an identification of the fuels to be combusted in the affected facility; and
 - c. the annual capacity factor at which the permittee anticipates operating the facility based on all fuels fired and based on each individual fuel fired.
- (10) The permittee shall submit for approval within 360 days of startup a plan that identifies the operating conditions to be monitored to demonstrate compliance with the nitrogen oxide emission limitations. The plan shall:
 - a. identify the specific operating conditions to be monitored and the relationship between these operating conditions and nitrogen oxide emission rates (i.e., ng/J or lbs/million Btu heat input). Steam generating unit operating conditions include, but are not limited to, the degree of staged combustion (i.e., the ratio of primary air to secondary and/or tertiary air) and the level of excess air (i.e., flue gas oxygen level);
 - b. include the data and information that the owner or operator used to identify the relationship between nitrogen oxides emission rates and these operating conditions; and
 - c. identify how these operating conditions, including steam generating unit load, will be monitored on an hourly basis by the permittee during the period of operating of the affected facility; the quality assurance procedures or practices that will be employed to ensure that the data generated by monitoring these operating conditions will be representative and accurate; and the type and format of the

Effective Date: To be entered upon final issuance

records of these operating conditions, including steam generating unit load, that will be maintained by the permittee.

- (11) The permittee shall submit excess emission reports for any calculated exceedance of the NOx emission limitation. All reports shall be submitted by the 30th day following the end of the 6 month reporting period.
- (12) Pursuant to the NSPS, section 60.7, the source owner/operator is hereby advised of the requirement to submit a written report to the administrator (not more than 60 days or as soon as practicable before the change is commenced) the following:
 - a. information describing the precise nature of the change;
 - b. present and proposed emissions control systems;
 - c. productive capacity of the facility before and after the change; and
 - d. expected completion date of the change.

The administrator may request additional relevant information subsequent to this notice.

Report required in term e)(12) is to be sent to:

Ohio Environmental Protection Agency

DAPC - Permit Management Unit

P. O. Box 163669

Columbus, Ohio 43216-3669

and

Akron Air Pollution Control

146 South High Street

Room 904

Akron, Ohio 44308

- (13) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.
- (14) The permittee shall submit reports within 30 days following the end of each calendar quarter to the Akron RAQMD documenting all instances of opacity values in excess of

Effective Date: To be entered upon final issuance

the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective action(s) taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line and combusting a fuel other than natural gas (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunction. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

- (15) 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) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 3 months after start-up
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for particulates, nitrogen oxides, SO₂, carbon monoxide, organic compounds, hydrogen chloride and sulfuric acid mist.
- c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

for PE, Methods 1-5 of 40 CFR Part 60, Appendix A (while firing 11%TDF and wood mix);

for NO_x, Methods 1-4 and 7E of 40 CFR Part 60, Appendix A (while firing only wood);

for SO₂, Methods 1-4 and 6C of 40 CFR Part 60, Appendix A (while firing 11%TDF and wood mix);

Effective Date: To be entered upon final issuance

for CO, Methods 1-4 and 10 of 40 CFR Part 60, Appendix A (while firing only wood);

for OC, Methods 1-4 and 25A of 40 CFR Part 60, Appendix A (while firing 11%TDF and wood mix);

for HCl, Methods 1-4 and 26 of 40 CFR Part 60, Appendix A (while firing 11%TDF and wood mix); and

for H₂SO₄ mist, Methods 1-4 and 8 of 40 CFR Part 60, Appendix A (while firing 11%TDF and wood mix).

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

- d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

- (2) The permittee shall demonstrate the maximum heat input capacity of the steam generating unit by operating it as maximum capacity for 24 hours. The permittee shall determine the maximum heat input capacity using the production rate at which the emissions unit will be operated, but not later than 180 days after initial start-up of the emissions unit. Subsequent demonstrations may be required by the Administrator at any other shall be used to determine the capacity utilization rate for the emissions unit. Otherwise, the maximum heat input capacity provided by the manufacturer is used.
- (3) Compliance with the emission limitation(s) in Section b)(1) of these terms and conditions shall be determined in accordance with the following method(s):

Effective Date: To be entered upon final issuance

a. Emission Limitation:

0.02 lb of PE/mmBtu of actual heat input, when combusting only natural gas

Applicable Compliance Method:

The AP-42 [(7/98) Table 1.4-2] emission factor for natural gas combustion is 1.9 lbs of PE per (filterable) 10^6 scf. This factor is based on an average natural gas heating value of 1,020 Btu/scf and is equivalent to 0.007451 lb of PE per mmBtu.

The permittee shall demonstrate compliance with the PE limitation above based on the results of emission testing conducted in accordance with Methods 1 – 5 of 40 CFR, Part 60, Appendix A.

b. Emission Limitations:

0.08 lb of PE/mmBtu of actual heat input

14.4 lbs/hr of PE

Applicable Compliance Method:

The permittee shall demonstrate compliance with the PE limitation above based on the results of emission testing conducted in accordance with Methods 1 – 5 of 40 CFR, Part 60, Appendix A.

c. Emission Limitations:

0.24 lb of NO_x/mmBtu of actual heat input

43.2 lbs/hr of NO_x

Applicable Compliance Method:

The permittee shall demonstrate compliance with the NO_x emission limitations above based on the results of emission testing conducted in accordance with Methods 1-4 and 7E, 40 CFR Part 60, Appendix A.

d. Emission Limitations:

0.28 lb of SO₂ / mmBtu of actual heat input

50.4 lbs/hr of SO₂

Applicable Compliance Method:

The permittee shall demonstrate compliance with the SO₂ emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 6C, 40 CFR Part 60, Appendix A.

Effective Date: To be entered upon final issuance

e. Emission Limitation:

18.0 lbs/hr of CO

Applicable Compliance Method:

The permittee shall demonstrate compliance with the CO limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 10, 40 CFR Part 60, Appendix A.

f. Emission Limitations:

0.36 lbs/hr of OC

1.58 tpy of OC

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly OC emission limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 25A, 40 CFR Part 60, Appendix A.

The annual emission limitation was developed by multiplying the hourly mass emission limitation by 8760 hours per year, and then dividing by 2000. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is maintained.

g. Emission Limitations:

0.09 lb HCl/mmBtu

16.2 lbs/hr of HCl

19.87 tpy of HCl

Applicable Compliance Method:

The permittee shall demonstrate compliance with the HCl limitations above based on the results of emission testing conducted in accordance with Methods 1-4 and 26, 40 CFR Part 60, Appendix A.

To demonstrate compliance with the annual emission limitation, multiply the result of most recent stack test, in pounds/mmBtu, by the rated boiler capacity of 180 mmBtu/hr, by the maximum operating hours of 8760 hours/year and divide by 2000 to convert the result to tons.

h. Emission Limitations:

0.053 lb of sulfuric acid mist/mmBtu

9.56 lbs/hr of sulfuric acid mist

Applicable Compliance Method:

The permittee shall demonstrate compliance with the sulfuric acid mist limitation based on the results of emission testing conducted in accordance with Methods 1-4 and 8, 40 CFR Part 60, Appendix A.

i. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a 6-minute average, (except for one 6-minute period per hour of not more than 27% opacity)

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be demonstrated by the results of testing in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

j. Emission Limitation:

135.5 tons per rolling, 12-month period of SO₂ from B003 and B004, combined

Applicable Compliance Method:

Annual SO₂ emissions = SO₂ emissions from TDF + SO₂ emissions from wood

SO₂ emissions from TDF = tons of TDF burned * 26 mmBtu/ton * 1.17 lb/mmBtu * 1 ton/2,000 lbs

SO₂ emissions from wood = tons of wood burned * 11 mmBtu/ton * 0.01 lb/mmBtu * 1 tons/2,000 lbs

The mmBtu heat content and emission rates in lb/mmBtu in the above equations should be adjusted if data obtained during emission testing warrants a change.

k. Emission Limitation:

23.4 tons per rolling, 12-month period of sulfuric acid mist from B003 and B004 combined

Applicable Compliance Method:

The permittee shall demonstrate compliance with the limitation above by multiplying the result of the most recent stack test, in pounds/mmBtu, by the rated boiler capacity of 180mmBtu/hr, by the maximum operating hours of 8760 hours/year, and dividing by 2000 lbs/ton.

l. Emission Limitations:

36.22 tpy of PM for emissions units B003 and B004, combined

130.24 tpy of NO_x for emissions units B003 and B004, combined

Effective Date: To be entered upon final issuance

56.29 tpy of CO for emissions units B003 and B004, combined

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitations based upon the record keeping requirements in section c)(5) of these T&Cs.

m. Emission Limitation:

Annual capacity factor for natural gas shall be limited to 10 percent (0.10)

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above limitation based upon the record keeping requirements of section c)(6) of these T&Cs.

g) **Miscellaneous Requirements**

(1) The permittee shall maintain a plan that identifies the operating conditions to be monitored to demonstrate compliance with the nitrogen oxides emission limitations. The plan shall:

- a. identify the specific operating conditions to be monitored and the relationship between these operating conditions and nitrogen oxides emission rates (i.e., ng/J or lbs/million Btu heat input). Steam generating unit operating conditions include, but are not limited to, the degree of staged combustion (i.e., the ratio of primary air to secondary and/or tertiary air) and the level of excess air (i.e., flue gas oxygen level);
- b. include the data and information that the owner or operator used to identify the relationship between nitrogen oxides emission rates and these operating conditions; and
- c. identify how these operating conditions, including steam generating unit load, will be monitored on an hourly basis by the permittee during the period of operating of the affected facility; the quality assurance procedures or practices that will be employed to ensure that the data generated by monitoring these operating conditions will be representative and accurate; and the type and format of the records of these operating conditions, including steam generating unit load, that will be maintained by the permittee.

The permittee shall maintain a written quality assurance/quality control plan for the continuous opacity monitoring system designed to ensure continuous valid and representative readings of opacity. The plan shall include, as a minimum, conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that sections 7.1.4, 7.4.1, 7.4.2, and Table 1-1 of Performance Specification 1 are maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.