



Environmental
Protection Agency

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

10/6/2010

Certified Mail

Manuel Dominguez
NASA John H. Glenn Research Center - Lewis Field
21000 Brookpark Road
M/S 6-4
Brook Park, OH 44135-3191

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1318001169
Permit Number: P0106105
Permit Type: Initial Installation
County: Cuyahoga

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

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Cleveland Division of Air Quality. 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.

Sincerely,

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

Cc: U.S. EPA
CDAQ; Pennsylvania; Canada



Response to Comments

Response to comments for: Permit-To-Install

Table with 2 columns and 7 rows containing facility details: Facility ID, Facility Name, Facility Description, Facility Address, Permit #, Hearing date, and Hearing Public Notice Date.

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

- 1. Topic: None
a. Comment: None
b. Response: None
2. Topic: None
a. Comment: None
b. Response: None



FINAL

**Division of Air Pollution Control
Permit-to-Install**

for

NASA John H. Glenn Research Center - Lewis Field

Facility ID: 1318001169
Permit Number: P0106105
Permit Type: Initial Installation
Issued: 10/6/2010
Effective: 10/6/2010



Division of Air Pollution Control
Permit-to-Install
for
NASA John H. Glenn Research Center - Lewis Field

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Authorization

Facility ID: 1318001169

Facility Description: Research and development center.

Application Number(s): A0039147

Permit Number: P0106105

Permit Description: Initial installation of a J57 jet engine. A component of the PSL Building 124 J57 Heating system that was manufactured between 1955 and 1960 -- P027.

Permit Type: Initial Installation

Permit Fee: \$1,000.00

Issue Date: 10/6/2010

Effective Date: 10/6/2010

This document constitutes issuance to:

NASA John H. Glenn Research Center - Lewis Field
21000 Brookpark Road
Cleveland, OH 44135-3191

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:

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

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: P0106105
Permit Description: Initial installation of a J57 jet engine. A component of the PSL Building 124 J57 Heating system that was manufactured between 1955 and 1960 -- P027.

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

Emissions Unit ID:	P027
Company Equipment ID:	PSL 124 Preheater #2
Superseded Permit Number:	
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.

- 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 Cleveland Division of Air Quality.

- (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 Cleveland Division of Air Quality. 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 Cleveland Division of Air Quality 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 Cleveland Division of Air Quality 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:

- (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 Cleveland Division of Air Quality 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 Cleveland Division of Air Quality.

- 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 Cleveland Division of Air Quality. 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.

- 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.



- 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

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.

C. Emissions Unit Terms and Conditions

1. P027, PSL 124 Preheater #2

Operations, Property and/or Equipment Description:

J57 Engine #2 - PSL Preheater

- 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) None.
- b) Applicable Emissions Limitations and/or Control Requirements
 - (1) The specific operations, property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are set forth below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/01	Carbon Monoxide (CO) emissions shall not exceed 27.18 lbs per hour. Particulate Emissions (PE) (includes PM ₁₀ and PM _{2.5}) emissions shall not exceed 42.58 lbs/hr. Volatile Organic Compound (VOC) emissions shall not exceed 12.84 lbs per hour. See (2)a.
b.	Ohio Revised Code (ORC) rule 3704.03(T)	Nitrogen Oxide (NOx) emissions shall not exceed 96.0 ppmvd. Sulfur dioxide (SO ₂) emissions shall not exceed 0.5 lbs/mmBtu.
c.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/06	See (2)b.
d.	OAC rule 3745-31-05(D)(1) Synthetic Minor to avoid PSD and NNSR	See (2)c. and (2)d.
e.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.
f.	OAC rule 3745-18-06(F)	The requirement of this rule is equivalent to the requirement of ORC 3704.03(T)

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to OAC paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to ORC changes effective August 3, 2006 (S.B. 265 changes), such that BAT is no longer required by State regulations for NAAQS pollutant less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of 3745-31-05, then these emission limits/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the SIP.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PE, VOC, and CO emissions from this air contaminant source since the calculated annual emissions rates for these pollutants are less than 10 tpy taking into account the federally enforceable limits under OAC rule 3745-31-05(D).

c. The permittee has proposed a federally enforceable voluntary restriction on the annual jet fuel usage of 800,000 gallons per rolling 12 months to ensure that future projected actual emissions will not cause an increase above the major modification thresholds.

d. The emissions from this unit as a 12-month rolling summation, shall not exceed the following:

CO	5.54 tpy
NOx	23.63 tpy;
PE	8.52 tpy (includes both PM ₁₀ and PM _{2.5});
SO ₂	20.8 tpy; and
VOC	2.57 tpy.

e. The quality of the jet fuel burned in this emissions unit shall meet the following specifications on an "as burned" basis:

- i. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.5 pounds sulfur dioxide/MMBtu actual heat input; and
- ii. a heating content greater than 128,800 Btu/gallon of fuel.

Compliance with the above-mentioned specifications shall be determined by using the analytical results provided by the permittee or fuel supplier for each shipment of fuel.

- f. For the purpose of this restriction, all particulate emissions are assumed to be equivalent to or greater than PM_{2.5} and PM₁₀ emissions. As better test methods are developed to speciate PM_{2.5}, these numbers may change.

c) **Operational Restrictions**

- (1) The permittee shall burn only commercially available naphtha and distillate-based jet fuels (i.e., no experimental jet fuels) in this emissions unit.
- (2) The amount of commercially available naphtha and distillate-based jet fuel burned in this emissions unit shall not exceed 800,000 gallons per year based upon a rolling 12-month summation of the monthly gallon usage amounts.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the annual jet fuel consumption specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Fuel Consumption Rate (gallons)</u>
1	66,674
1-2	133,340
1-3	200,006
1-4	266,672
1-5	333,338
1-6	400,004
1-7	466,670
1-8	533,336
1-9	600,002
1-10	666,668
1-11	733,334
1-12	800,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for fuel usage shall be based upon a rolling, 12 month summation of the monthly emissions.

- (3) The quality of the jet fuel burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in this permit.

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

- (1) The permittee shall maintain monthly records of the following information:
 - a. the name and/or identification number of each fuel used;

- b. the amount of fuel consumed for each month; and
- c. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the fuel consumed.

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

- (2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (3) For each shipment of jet fuel received for burning in this emissions unit, the permittee shall maintain records of the total quantity of fuel received, the fuel identification, the permittee's or fuel supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the fuel for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of

Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

e) Reporting Requirements

- (1) 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.
- (2) The permittee shall submit deviation (excursion) reports to the Cleveland Division of Air Quality (CDAQ) that identify each day when a fuel other than commercially available naphtha and distillate-based jet fuel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. any exceedance of the 800,000 gallons per year naphtha and distillate-based jet fuel limitation.

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

- (4) The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

f) Testing Requirements

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

a. Emission Limitation:

Carbon Monoxide - 27.18 lbs per hour
Particulate Matter – 42.58 lbs per hour
Volatile Organic Compounds – 12.84 lbs per hour

Applicable Compliance Method

The short term emissions limitation was determined by multiplying the worst case scenario emissions factor for each pollutant by the maximum fuel consumption rate of the unit (2000 gallons/hour).

Emissions Factors

Emissions factors taken from IERA-RS-BR-SR-2001-0010 titled “UNITED STATES AIR FORCE IERA Air Emissions Inventory Guidance Document for Mobile Sources at Air Force Installations:

Carbon Monoxide - 13.5876 lbs/1000 gallons

Particulate Matter - 21.29 lbs/1000 gallons

Volatile Organic Compounds - 6.422 lbs/1000 gallons

b. Emission Limitation

NOx emissions from this unit shall not exceed 96.0 ppmv.

Applicable Compliance Method

Compliance with this emissions limitation shall be determined through the following calculation:

$$\text{ppmv} = (\text{mg}/\text{m}^3)(273.15 + ^\circ\text{C}) / (12.187)(\text{MW})$$

where:

ppmv - ppm by volume

mg/ m³ - milligrams of gaseous pollutant per cubic meter of ambient air

MW - molecular weight of the gaseous pollutant

° C - ambient air temperature in degrees Centigrade

From Screen 3 NOx concentration specific to this unit = 137.4 ug/m³

$$137.4 \text{ ug}/\text{m}^3 * 0.001\text{mg}/1 \text{ ug} = 0.1374 \text{ mg}/\text{m}^3$$

$$(0.1374)(273.15 + 25) / (12.187)(44.02) = 0.076\text{ppmv}$$

c. Emission Limitation

Sulfur dioxide emissions from this unit shall not exceed 0.5 lb/MMBtu.

Applicable Compliance Method

Continuous compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of fuel received during a calendar month meets the limitation.

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

Sulfur dioxide emissions from liquid fuel samples shall be calculated as follows:

$$\text{ER} = [(1 \times 10^6) / \text{H}] \times \text{D} \times \text{S} \times 1.974$$

where:

ER = the emission rate in pounds of sulfur dioxide per MMBtu;

H = the heat content of the liquid fuel in Btu per gallon;

D = the density of the liquid fuel in pounds per gallon; and

S = the decimal fraction of sulfur in the liquid fuel.

d. Emission Limitation

Carbon Monoxide - 5.54 TPY based upon a rolling 12 - month summation
 Nitrogen Oxide – 23.63 TPY based upon a rolling 12 - month summation
 Particulate Matter - 8.52 TPY based upon a rolling 12 - month summation
 Sulfur Dioxide – 20.8 TPY based upon a rolling 12 - month summation
 Volatile Organic Compounds - 2.57 TPY based upon a rolling 12 - month summation

Applicable Compliance Method

Compliance with the long term emissions limitation shall be determined by multiplying the annual jet fuel consumption (annual consumption shall not exceed 800,000 gallons) in gallons, by the IERA-RS-BR-SR-2001-0010 titled ““UNITED STATES AIR FORCE IERA Air Emissions Inventory Guidance Document emissions factors from f)(1)a. and below, then dividing by 1 ton/2000 lbs.

Nitrogen Oxide – 59.0824 lbs/1000 gallons
 Sulfur Dioxide – 52 lbs/1000 gallons

e. Emission Limitation

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

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

g) Miscellaneous Requirements

(1) Calculations and Emissions Factors

IERA-RS-BR-SR-2001-0010 titled ““UNITED STATES AIR FORCE IERA Air Emission Inventory Guidance Document for Mobile Sources at Air Force Installations

a. PE (PM₁₀/PM_{2.5})*

$(21.29 \text{ lbs PE}/1000 \text{ gal})(800,000 \text{ gal/yr})(1 \text{ ton}/2000 \text{ lbs}) = 8.52 \text{ TPY PE}$

*PE represents PM₁₀/PM_{2.5} combined emissions

b. Carbon Monoxide (CO)

$(13.5876 \text{ lbs CO}/1000 \text{ gal})(800,000 \text{ gal/yr})(1 \text{ ton}/2000 \text{ lbs}) = 5.54 \text{ TPY CO}$

c. Volatile Organic Compounds (VOC)

$(6.42 \text{ lbs VOC}/1000 \text{ gal})(800,000 \text{ gal/yr})(1 \text{ ton}/2000 \text{ lbs}) = 2.57 \text{ TPY VOC}$