



Environmental Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

2/8/2011

Certified Mail

Andrew Roebel  
DEGS of St. Bernard, LLC  
139 East Fourth Street  
Mail Drop EM740  
Cincinnati, OH 45202

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 1431394148  
Permit Number: P0105661  
Permit Type: Administrative Modification  
County: Hamilton

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
Yes	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
Yes	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](http://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 Josh Mandel," 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 Hamilton County Dept. of Environmental Services. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://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  
HCDOES; Indiana; Kentucky





## Response to Comments

Response to comments for: Permit-To-Install

Facility ID:	1431394148
Facility Name:	DEGS of St. Bernard, LLC
Facility Description:	Facility produces process steam for various independent manufacturing facilities. Previously part of the Procter and Gamble Ivorydale complex.
Facility Address:	5189 Spring Grove Avenue Cincinnati, OH 45217 Hamilton County
Permit #:	P0105661, Administrative Modification
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Cincinnati Enquirer on 02/15/2010. The comment period ended on 03/31/2010.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

**Project: Duke Energy Generation Services of St. Bernard, LLC, Permit to Install (PTI)**  
**Ohio EPA ID # P0105661**

### Agency Contacts for this Project

Ohio EPA Division of Air Pollution Control:

Alan Lloyd, (614) 644-3613  
[alan.lloyd@epa.ohio.gov](mailto:alan.lloyd@epa.ohio.gov)

Hamilton County Department of  
Environmental Services:

Brad Miller, (513) 946-7731  
[brad.miller@hamilton-co.org](mailto:brad.miller@hamilton-co.org)

Public Involvement Coordinator:

Erika Wiggins, (614) 644-2160  
[erika.wiggins@epa.ohio.gov](mailto:erika.wiggins@epa.ohio.gov)

Ohio EPA issued a draft air pollution permit-to-install (PTI) P0105661 on February 11, 2010, to administratively modify PTI 14-05026, originally issued to the Procter & Gamble Company (P&G) on May 17, 2001. This permit modification is being performed to clarify the remaining emission reductions available for banking in the emission netting table of the permit. This document summarizes the comments and questions received during the comment period associated with the issuance of the above mentioned draft PTI on February 11, 2010.

Ohio EPA reviewed and considered all comments received during the public comment period. Sometimes public concerns fall outside the scope of Ohio EPA's authority. For example, concerns about zoning issues are

addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are organized in a consistent format. In addition, a number of comments received may not appear below as they were either unrelated to the proposed project; were rhetorical in nature and do not ask for a response; or the comment stated a belief, opinion, or plea but did not voice a question to be answered. Nevertheless, all comments received are part of the official record and have received consideration by Ohio EPA in making a final decision on the issuance of this permit.

Comments from the public

**Comment 1: The amount of emission reduction credits available is incorrect since emission credits are beyond ten years. These emission credits should not be used if they have been removed from the inventory and were used to bring the area into attainment.**

Response 1: The purpose of this permit is to clarify the May 17, 2001 permit that was originally issued to the Procter & Gamble Company. The original permit (and this updated permit) did not use any emission reduction credits as offsets. Instead, the original permit used the emissions credits generated from the shutdown sources in order to “net out” of major New Source Review (NSR) for the then installed new boiler. The rules for netting are different than those for the use of offsets and use a five year contemporaneous window. At the time, the new boiler was installed and the old boiler was shutdown all within the five year contemporaneous window.

This permit modification does not dictate when and where the left over credits can be used. All it does is more clearly identify how many credits were used for the 2001 netting and how many credits were left over for other purposes. The use of the left over credits is governed by rules that control how and when the credits can be used. The restrictions concerning how and when the credits can be used are dependent upon the circumstance of the project that uses them. Since this permit is not a permit that uses the left over credits, the comments concerning the age of the emission reduction credits and the nature of the state implementation plan (SIP) inventory are not relevant to this permitting action. This permitting action is simply intended to clarify the actual emission reductions which were not used in the original permit. We also note that the time duration of the emission reduction credits to be used as offsets is not presumptively or necessarily limited to ten years.

**Comment 2: In this modification Ohio EPA increased the amount of emissions available without an explanation. There is no information on how the emission credits were calculated.**

Response 2: Hamilton County Department of Environmental Services (HCDOES) and Ohio EPA files contain the calculations for the emissions credits. This draft permit uses the average actual emissions from 1997 and 1998 for emissions units B001, B008, and B021. This is a change from the PTI issued May 17, 2001 which used the emissions from 1998 and 1999. This change was made at the request of the company since the emissions units did not fully operate in 1999 thus that year was not representative of the actual emissions.

**Comment 3: The draft modification does not take into account emission reductions required by the NOx SIP Call, Reasonably Available Control Technology requirements, and the Clean Air Interstate Rule.**



Response 3: As discussed in Response #1, the DEGS permit modification documents **available** emission reduction credits. NOx emission reduction credits are not being used in this permit modification.

If the available emission reductions are used in the future, then the reductions will conform to Ohio and federal guidance which takes into account the issues identified by the commenter.

The Duke Energy Generation Services (DEGS) boiler (emissions unit B021) is part of the NOx State Implementation Plan (SIP) Call rule with a current allowance of nine tons per year. This allowance was documented in the staff determination for the Middletown Coke Company's NSR permit. It is currently accounted for in Ohio EPA's emission reduction banking system. If another applicant wishes to use the available credits in the future, then the Agency will follow any applicable regulations at that time.

The Reasonably Available Control Technology requirements have been incorporated into the Ohio Administrative Code (OAC) and Ohio EPA believes that this permit takes into account any applicable OAC rule requirements.

Lastly, none of the other boilers listed in this permit are subject to either the NOx SIP Call rule and/or the Clean Air Interstate Rule.

Therefore, Ohio EPA believes all of the relevant applicable requirements are currently being met and have been accounted for.

**Comment 4: The emission credits in this permit are not available since they were shut down in 1999 thus are not considered "existing air contaminant sources" as outlined in OAC rule 3745-31-22(A) (3)(a).**

Response 4: The emission reductions identified in this permit are being used in two different ways. First, a portion of the emission reductions were used to "net out" of the Prevention of Significant Deterioration (PSD) permitting for the installation of a new boiler (emissions unit B043) at P&G. This portion of the emission reductions were not used as emission offsets, therefore, OAC rule 3745-31-22(A)(3)(a) does not apply. The second portion of the emission reductions are simply being identified in this permit as emission reductions available for other purposes. These left over emission reductions can be used by other companies for emission offsets. However, all other applicable emission offset rules must be met by any other company planning to use the left over emission reductions. Since this permit is not using these left over emission reductions for emission offsets, OAC rule 3745-31-22(A)(3)(a) does not apply to this permit.

**Comment 5: There appears to be an error in the calculation of the amount of NOx emission credits available for banking.**

Response 5: Ohio EPA could not locate any error in the calculation of the NOx emission credits available for banking. Ohio EPA contacted the commenter and discussed the calculations. The commenter now agrees the calculations were correct.

**Comment 6: According to OAC rule 3745-31-24(G)(2), emission reductions may only be credited in the absence of an approved attainment demonstration only if the shutdown occurred on or after the date the major stationary source application is filed.**



Response 6: This permit does not use emission reductions as offsets. Instead, the contemporaneous emission reductions that were used in this permit were used for netting and were available when the permit was originally issued. Therefore, OAC rule 3745-31-24(G)(2) does not apply. Moreover, the unused VOC and NOx emission reduction credits in question are accounted for in an approved attainment demonstration and in the emission inventory and attainment demonstration for future SIP planning.

**Comment 7: OAC rule 3745-31-24(G)(1) stipulates that emission reductions from shutdown or limits on existing sources must have occurred after the date of the most recent emission inventory or attainment demonstration. Since there is no approved attainment demonstration for either the PM2.5 and the eight-hour ozone standard, the emissions cannot be used.**

Response 7: Please see Response 6.

**Comment 8: Since these emission credits are from shut down sources in 1999, there cannot be a net air quality benefit now.**

Response 8: Please see Response 1.

**Comment 9: The same baseline period must be used for the sinter plant emissions from AK Steel and the boiler emissions from Procter & Gamble/DEGS.**

Response 9: See the response to Comment 1. The sinter plant emissions from AK steel do not apply to this permit.

#### Comments from U.S. EPA

**Comment 10: Though this permit is an administrative modification, did it go through the same public notice procedures as a non-administrative permit?**

Response 10: Yes, this permit went through the normal public notice procedures. The permit was public noticed on February 15, 2010. Ohio EPA extended the public comment period to March 31, 2010 due to a delay in providing a personalized notice of the draft permit issuance to interested parties.

**Comment 11: If this permitting action affects or is affected by Middletown Coke Company, could you explain how?**

Response 11: The purpose of this administrative modification is to (1) align the representative time period of actual emissions from the shutdown emissions units, and (2) to clarify the amount of emission reductions that remain and are available for use or banking. The amount of emission reductions left over has been slightly adjusted because of the revised baseline dates. This particular permit does not require any changes to the Middletown Coke permit nor does it impact the Middletown Coke permit in any way.



**Comment 12: The assumption is made that the only changes being made to the permit are to the netting table in the last three pages of the permit. Could you explain which numbers are being revised and the reasons why?**

Response 12: There were no changes to the emission limits established in the original Procter and Gamble PTI for emissions unit B043. The major change was to add a row which identifies the "Emission Reduction Credits Available for Banking" in the netting table [term g)(2)]. Also a change was made to use the actual emissions from 1997 and 1998 for all emissions units in the netting table and to clarify which emission reductions were not used in that permitting action.

Comments from Duke Energy/DEGS

**Comment 13: Permit Section C.1.(d)(13) on Page 20 of 26 discusses air toxics. The permit states: "Predicted 1-Hour Maximum Ground –Level Concentration (ug/mg): 4.8. The use of the abbreviation "mg" is not correct. The abbreviation should be changed to m3 or cubic meter.**

Response 13: This change will be made.

**Comment 14: In permit Section C.1(b)(1)(a) on Page 14 of 26 the allowable carbon monoxide limit should state "6.50 lbs. CO/hour (when burning gas or oil at a rate of less than or equal to 61.25 MMBtu/hr.)". The words "less than" were omitted from this emissions unit.**

Response 14: This change will be made.

**Comment 15: In permit Section C.1.(g)(2) on page 24-25 of 26, for PM10, please clarify that the PM10 emissions were for filterable PM10 only.**

Response 15: This change will be made.





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install  
for  
DEGS of St. Bernard, LLC**

Facility ID:	1431394148
Permit Number:	P0105661
Permit Type:	Administrative Modification
Issued:	2/8/2011
Effective:	2/8/2011





Division of Air Pollution Control
Permit-to-Install
for
DEGS of St. Bernard, LLC

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## Authorization

Facility ID: 1431394148  
Facility Description: Facility produces process steam for various independent manufacturing facilities.  
Previously part of the Procter and Gamble Ivorydale complex.  
Application Number(s): M0000627  
Permit Number: P0105661  
Permit Description: Admin mod to clarify emission reductions  
Permit Type: Administrative Modification  
Permit Fee: \$250.00  
Issue Date: 2/8/2011  
Effective Date: 2/8/2011

This document constitutes issuance to:

DEGS of St. Bernard, LLC  
5189 Spring Grove Avenue  
Cincinnati, OH 45217

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

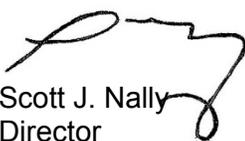
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Hamilton County Dept. of Environmental Services  
250 William Howard Taft Pkwy.  
Cincinnati, OH 45219-2660  
(513)946-7777

The above named entity is hereby granted 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

  
Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0105661  
Permit Description: Admin mod to clarify emission reductions

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

<b>Emissions Unit ID:</b>	<b>B043</b>
Company Equipment ID:	Boiler No. 5 (PB1), IG-10
Superseded Permit Number:	14-05026
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 Hamilton County Dept. of Environmental Services.
  - (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 Hamilton County Dept. of Environmental Services. 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 Hamilton County Dept. of Environmental Services 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 Hamilton County Dept. of Environmental Services 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 Hamilton County Dept. of Environmental Services 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 Hamilton County Dept. of Environmental Services.
- 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 Hamilton County Dept. of

Environmental Services. 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. B043, Boiler No. 5 (PB1), IG-10

Operations, Property and/or Equipment Description:

245 MMBtu/hr natural gas and no.2 fuel oil fired 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) d)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)	0.50 lb SO <sub>2</sub> /MMBtu (when burning oil) 0.0006 lb SO <sub>2</sub> /MMBtu (when burning gas)  0.10 lb NO <sub>x</sub> /MMBtu (when burning gas at a rate greater than 61.25 MMBtu/hr)** 0.17 lb NO <sub>x</sub> /MMBtu (when burning oil at a rate greater than 61.25 MMBtu/hr)** 0.20 lb NO <sub>x</sub> /MMBtu (when burning gas or oil at a rate of less than or equal to 61.25 MMBtu/hr)** 114.82 TPY NO <sub>x</sub> *  0.105 lb CO/MMBtu (when burning gas or oil at a rate greater than 61.25 MMBtu/hr) 6.50 lbs CO/hour (when burning gas or oil at a rate of less than or equal to 61.25 MMBtu/hr) 112.68 TPY CO*  0.005 lb OC/MMBtu and 5.37 TPY OC*  0.020 lb PM <sub>10</sub> /MMBtu 21.47 TPY TPY PM/PM <sub>10</sub> *  9E-6 lb Pb/MMBtu (when burning oil) 5E-7 lb Pb/MMBtu (when burning gas) 0.0015 TPY Pb*(Lead)  The requirements of this rule also include



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>compliance with the requirements of 40 CFR Part 60 Subpart Db, OAC rule 3745-17-10(B)(1) and OAC rule 3745-31-05(D).</p> <p>* Based upon a rolling, 365-day summation of the daily emissions.</p> <p>** Compliance with the NOx emission limitations stated above shall be based on a daily average recorded by the NOx monitoring system during each day that the emissions unit was in operation. A separate average shall be calculated for each of the 3 firing scenarios outlined above. A new daily average emission rate is calculated each day that the emissions unit is in operation.</p>
b.	OAC rule 3745-31-05(D) Synthetic Minor to avoid Prevention of Significant Deterioration	<p>54.24 TPY SO2*</p> <p>* Based upon a rolling, 365-day summation of the daily emissions.</p>
c.	OAC rule 3745-31-05(D) Netting to avoid Prevention of Significant Deterioration	See g)(2).
d.	40 CFR Part 60 Subpart Db	<p>See b)(2)c. for the opacity standard See terms c)(2), d)(3) and e)(4) for the SO2 standards.</p> <p>The emission limitation specified by this rule for NOx is less stringent than the NOx emission limitations established pursuant to OAC rule 3745-31-05(A)(3).</p>
e.	OAC rule 3745-17-07(A)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to 40 CFR Part 60 Subpart Db.
f.	OAC rule 3745-17-10(B)(1)	0.020 lb PM/MMBtu of actual heat input.
g.	OAC rule 3745-18-06(D)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United 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.

- b. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the limited hours of operation when burning No. 2 fuel oil, emissions limitations, and the use of low NOx burners.
- c. In accordance with 40 CFR 60.43b(F), visible particulate emissions from the stack shall not exceed 20 percent opacity as a six-minute average, except for one six-minute period per hour of not more than 27 percent opacity.

c) **Operational Restrictions**

- (1) The permittee shall burn only natural gas and/or number two fuel oil in this emissions unit.
- (2) The quality of the No. 2 oil burned in this emissions unit shall have a combination of sulfur content and heat content sufficient to meet the sulfur dioxide emission limitation of 0.50 lb/MMBtu of actual heat input.
- (3) The maximum annual hours of operation when burning No. 2 fuel oil in this emissions unit shall not exceed 876 hours, based upon a rolling, 365-day summation of the hours of operation when burning No.2 fuel oil.

To ensure enforceability during the first 12 calendar months of operation following the startup of this emissions unit, the permittee shall not exceed the hours of operation when burning No. 2 fuel oil limits specified in the following table:

Months	Maximum Allowable Cumulative Hours of Operation When Burning No. 2 Fuel Oil
1	500
1-2	500
1-3	500
1-4	500
1-5	500
1-6	500
1-7	700
1-8	700
1-9	700



1-10	876
1-11	876
1-12	876

After the first 12 calendar months of operation following start-up of this emissions unit, compliance with the annual hours of operation when burning No. 2 fuel oil limitation shall be based upon a rolling, 365-day summation of the hours of operation when burning No. 2 fuel oil.

- (4) The permittee shall install, operate and maintain low-NOx burners at all times when operating this emissions unit.
- (5) The start up of emissions unit B043, OEPA premise number 1431394148 shall be concurrent with the complete and permanent shutdown of Ohio EPA emissions unit B021, OEPA premise number 1431394148.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) Prior to the installation of the continuous NOx monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 6 for approval by the Ohio EPA, Central Office.

Within 60 days after achieving the maximum production rate at which this emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit, the permittee shall conduct certification tests of such equipment pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6. Personnel from the appropriate Ohio EPA district Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the appropriate Ohio EPA District Office or local air agency within 30 days after the test is completed. Copies of the test results shall be sent to the appropriate Ohio EPA District Office or local air agency and the Ohio EPA, Central Office. Certification of the continuous NOx monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6.

The permittee shall operate and maintain existing equipment to continuously monitor and record NOx from this emissions unit in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous NOx monitoring system including, but not limited to, parts per million NOx on an

instantaneous (one-minute) basis, emissions of NO<sub>x</sub> in units of the applicable standard in the appropriate averaging period (e.g., hourly, hourly rolling, 3-hour, daily, 30-day rolling, etc.), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

- (3) For each shipment of 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, heat content and the calculated SO<sub>2</sub> emission rate [the SO<sub>2</sub> emission rate shall be calculated as specified in OAC 3745-18-04(F)]. The records shall also include certification from the fuel oil supplier that the oil meets the definition of distillate oil [see 40 CFR 60.49b( r)].

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of 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, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

- (4) The permittee shall maintain daily records of the quantity of oil (in gallons) and natural gas (in mmft<sup>3</sup>) used in this emissions unit.
- (5) The permittee shall maintain daily records of the following information for this emissions unit:
  - a. The total hours of operation when burning No. 2 fuel oil for each day; and,
  - b. Beginning after the first 12 calendar months of operation following the start-up of this emissions unit, the rolling, 365-day summation of the hours of operation when burning No. 2 fuel oil.

Also, during the first 12 calendar months of operation following the start-up of this emissions unit, the permittee shall record the cumulative hours of operation when burning No. 2 fuel oil for each calendar month.

- (6) For each day that this emissions unit burns No. 2 fuel oil, the permittee shall conduct, or have conducted, a one hour visible particulate emissions test in accordance with the following requirements:
  - a. The visible particulate emissions test shall be conducted to demonstrate compliance with the visible particulate limitation outlined in this permit;
  - b. The following test method(s) shall be employed to demonstrate compliance with the visible particulate limitation: Method 9 as outlined in 40 CFR Part 60, Appendix A; and
  - c. The visible particulate emissions test shall be conducted by a certified visible emissions evaluator who has met the specification of Method 9 outlined in 40 CFR Part 60, Appendix A.

A comprehensive written report on the results of the visible particulate emissions test shall be signed by the person or persons responsible for the test and retained for a period of five years from the date the record was created. This report shall contain the following information:

- a. A copy of the visible emissions evaluation form; and
  - b. A copy of the visible emissions evaluator certification.
- (7) For each day during which this emissions unit operates burning natural gas at a rate of 61.25 MMBtu/hr or higher, the permittee shall maintain daily records of the following information for this emissions unit, for the purpose of determining NOx emissions:
- a. The NOx emission rate, in lbs NOx/MMBtu, as a daily average, when burning natural gas at a rate of 61.25 MMBtu/hr or higher; and
  - b. The heat input, in MMBtu/hr, as a daily average, when burning natural gas at a rate of 61.25 MMBtu/hr or higher.
- (8) For each day during which this emissions unit operates burning fuel oil at a rate of 61.25 MMBtu/hr or higher, the permittee shall maintain daily records of the following information for this emissions unit, for the purpose of determining NOx emissions:
- a. The NOx emission rate, in lbs NOx/MMBtu, as a daily average, when burning fuel oil at a rate of 61.25 MMBtu/hr or higher; and
  - b. The heat input, in MMBtu/hr, as a daily average, when burning fuel oil at a rate of 61.25 MMBtu/hr or higher.
- (9) For each day during which this emissions unit operates burning natural gas or fuel oil at a rate of less than or equal to 61.25 MMBtu/hr, the permittee shall maintain daily records of the following information for this emissions unit, for the purpose of determining NOx emissions:
- a. The NOx emission rate, in lbs NOx/MMBtu, as a daily average, when burning natural gas or fuel oil at a rate of less than or equal to 61.25 MMBtu/hr; and
  - b. The heat input, in MMBtu/hr, as a daily average, when burning natural gas or fuel oil at a rate of less than or equal to 61.25 MMBtu/hr or higher.
- (10) The permittee shall maintain the following records:
- Beginning after the first 12 calendar months of operation following the start-up of this emissions unit, the rolling, 365-day summation of the NOx emissions, in tons per year. Also, during the first 12 calendar months of operation following the start-up of this emissions unit, the permittee shall record the cumulative NOx emissions in pounds or tons for each calendar day.
- (11) The permittee shall maintain daily records of the CO emissions from this emissions unit.
- (12) The permittee shall maintain the following records:

Beginning after the first 12 calendar months of operation following the start-up of this emissions unit, the rolling, 365-day summation of the CO emissions, in tons per year. Also, during the first 12 calendar months of operation following the start-up of this emissions unit, the permittee shall record the cumulative CO emissions in pounds or tons for each calendar day.

- (13) The permit to install for this emissions unit (B043) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Ground-Level Concentration (MAGLC).

The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Hexane

TLV (ug/m<sup>3</sup>): 176,000

Maximum Hourly Emission Rate (lbs/hr): 0.44

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m<sup>3</sup>): 4.8

MAGLC (ug/m<sup>3</sup>): 4190

Physical changes to or in the method of operation of the emissions unit after it's installation or modification could affect the parameters used to determine whether or not the "Air Toxics Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," , than the lowest TLV value 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 pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied with the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31, and a modification of the existing permit to install will not be required. If the change(s) is(are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will satisfy the Air Toxic Policy:

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. when the computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

- (1) Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:
  - a. Construction date (no later than 30 days after such date);
  - b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
  - c. Actual start-up date (within 15 days after such date); and
  - d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio environmental Protection Agency  
Department of Environmental Services  
250 William Taft Road  
Cincinnati, Ohio 45219

- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (3) Pursuant to OAC 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031 and 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of NOx values in excess of the applicable limits specified in the terms and conditions of this

permit. These reports shall also contain the total NOx emissions for the calendar quarter (in tons).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA district Office or local air agency documenting any continuous NOx monitoring system downtime while the emissions unit was on line (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 also 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 fore 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.

- (4) 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 following information shall also be included with the copies of the permittee's or oil supplier's analyses:
- a. The total quantity of oil received in each shipment (gallons);
  - b. The weighted\* average sulfur content (percent by weight) for the oil received during each calendar month;
  - c. The weighted\* average heat content (Btu/gallon) of the oil received during each calendar month; and
  - d. The weighted\* average SO<sub>2</sub> emission rate (lbs/MMBtu of actual heat input) of the oil combusted during each calendar month [the SO<sub>2</sub> emission rate shall be calculated as specified in OAC 3745-18-04(f)].

\*In proportion to the quantity of oil received in each shipment during each calendar month. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall cover the oil shipments received during the previous calendar quarters.

- (5) The permittee shall submit annual reports which specify the total NOx, SO<sub>2</sub>, PM/PM<sub>10</sub> and CO emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

- (6) The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 365-day hours of operation when burning No. 2 fuel oil limitation and, for the first 12 calendar months of operation following the start-up of this emissions unit, all exceedances of the maximum allowable cumulative hours of operation when burning No. 2 fuel oil limitation.
  - (7) The permittee shall submit deviation (excursion) reports which identify each day during which No. 2 oil was burned in this emissions unit and a one hour visible particulate emissions test was not performed.
  - (8) The permittee shall submit deviation (excursion) reports which identify each day during which there was an exceedance of the lb/MMBtu and lbs/hr limitations or the rolling, 365-day summation totals for NOx and CO emissions as established in b)(1) above.
  - (9) The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.
- f) Testing Requirements
- (1) Compliance with the visible particulate limitation shall be demonstrated by the Methods outlined in 40 CFR Part 60, Appendix A, Method 9.
  - (2) 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 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility;
    - b. the emissions testing shall be conducted to demonstrate compliance with the allowable NOx and CO limitations;
    - c. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: Method 7 and 10. Alternative U.S. EPA approved test methods may be used with prior approval from the Hamilton County Department of Environmental Services; and,
    - 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 Hamilton County Department of Environmental Services.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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 Hamilton County Department of Environmental Services refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services 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 Hamilton County Department of environmental Services 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 Hamilton County Department of Environmental Services.

- (3) Compliance with the sulfur dioxide emission limitations in b)(1) and c)(2) shall be determined by the fuel oil analysis and recordkeeping requirements specified in d)(3).
- (4) Compliance with the emission limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies (if applicable) and the operational parameters as submitted in the application for PTI 14-05026 submitted September 29, 2000. For PM and PM10, compliance will be based on the emission factors described in Compilation of Air Pollution Emission Factors, Volume I: Stationary Point and Area Sources, Fifth Edition, AP-42 Section 1.4 for natural gas firing conditions and Section 1.3 for No. 2 fuel oil firing conditions. Compliance with the NOx and CO emission limitations outlined in this permit shall be demonstrated by the recordkeeping requirements specified in d)(7), d)(8), d)(9), d)(10), d)(11), and d)(12).
- (5) Compliance with the hours of operation when burning No. 2 fuel oil limitation in term c)(3) will be demonstrated by the recordkeeping requirements specified in d)(5).

g) **Miscellaneous Requirements**

- (1) Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous NOx monitoring system designed to ensure continuous valid and representative readings of NOx emissions in units of the applicable standard. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous NOx monitoring system must be kept on site and available for inspection during regular office hours.
- (2) The following is a summary of the netting emissions in tons per year (TPY):



Emissions Unit	Pollutant	Decrease	Increase
B043 (1431394148) (PTI 14-05026)	PM10		+21.46
P148-P149 (1431390903) (PTI 14-04785)	PM10		+5.02
P023 Modification (1431390903) (PTI 14-04633)	PM10		+0.002
Milled bar soap changes totals since 1996	PM10		+9.74
T009 (1431390903) (PTI 14-04279)	PM10		+0.025
P010, P111, P115, P063 (1431390903)	PM10	-30.73*	
B008 (1431390903)	PM10	-0.35*	
B001 (1431390903)	PM10	-0.69*	
B021 (1431390903)	PM10	-3.79*	
<b>Net Emissions Change</b>	PM10**		+0.69
B043 (1431394148) (PTI 14-05026)	SO2		+54.24
P023 Modification (1431390903) (PTI 14-04633)	SO2		+8.4
P010, P111, P115, P063 (1431390903)	SO2	-0.06*	
B008 (1431390903)	SO2	-4.68*	
B001 (1431390903)	SO2	-8.96*	
B021 (1431390903)	SO2	-448.17*	



<b>Emission Reduction Credits Available for Banking</b>	SO2		+398.23
<b>Net Emissions Change</b>	SO2	-1.0	
B043 (1431394148) (PTI 14-05026)	NOx		+114.82
P023 Modification (1431390903) (PTI 14-04633)	NOx		+0.04
P010, P111, P115, P063 (1431390903)	NOx	-11.24*	
B008 (1431390903)	NOx	-2.17	
B001 (1431390903)	NOx	-4.43	
B021 (1431390903)	NOx	-349.96	
<b>Emission Reduction Credits Available for Banking</b>	NOx		+251.94
<b>Net Emissions Change</b>	NOx	-1.0	
B043 (1431394148) (PTI 14-05026)	CO		+112.68
P023 Modification (1431390903) (PTI 14-04633)	CO		+0.01
P010, P111, P115, P063 (1431390903)	CO	-9.44*	
B008 (1431390903)	CO	-0.26*	
B001 (1431390903)	CO	-0.56*	
B021 (1431390903)	CO	-8.25*	
<b>Net Emissions Change</b>	CO		+94.18

\* Based on average actual emissions for 1997 and 1998.

\*\* PM10 emissions are filterable only

- (3) The terms and conditions of this permit to install (P0105661) shall supersede the terms and conditions of permit to install 14-05026 issued on May 17, 2001.