Ohio Environmental Protection Agency
John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

11/17/2011

Certified Mail

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

Mike Heise
The Medical Center Company
2250 Circle Drive
Cleveland, OH 44106-2664

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1318003059
Permit Number: P0109036
Permit Type: Administrative Modification
County: Cuyahoga

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 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 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

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

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

Ohio | Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install
for
The Medical Center Company

Facility ID:	1318003059
Permit Number:	P0109036
Permit Type:	Administrative Modification
Issued:	11/17/2011
Effective:	11/17/2011

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install
for
The Medical Center Company

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Authorization

Facility ID: 1318003059
Facility Description: Steam heat and hot/chilled water provider.
Application Number(s): M0001440
Permit Number: P0109036
Permit Description: Administrative PTI modification for emissions unit B022 - 125.0 mmBtu/hr natural gas-fired boiler. This PTI is being modified to remove the testing term in the permit that requires the NOx continous emission monitoring equipment be certified at least 3 months before determining compliance with any applicable emissions limitation. Also, the references to Performance Specification 6 as it relates to certification of the CEMS will be removed from the permit. The facility has chosen to meet the requirements of Performance Specification 2.
Permit Type: Administrative Modification
Permit Fee: $0.00
Issue Date: 11/17/2011
Effective Date: 11/17/2011

This document constitutes issuance to:

The Medical Center Company
2250 Circle Drive
Cleveland, OH 44106-2664

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

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0109036
Permit Description: Administrative PTI modification for emissions unit B022 - 125.0 mmBtu/hr natural gas-fired boiler. This PTI is being modified to remove the testing term in the permit that requires the NOx continous emission monitoring equipment be certified at least 3 months before determining compliance with any applicable emissions limitation. Also, the references to Performance Specification 6 as it relates to certification of the CEMS will be removed from the permit. The facility has chosen to meet the requirements of Performance Specification 2.

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

Emissions Unit ID:	**B022**
Company Equipment ID:	Gas Boiler #7
Superseded Permit Number:	P0108095
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 emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, 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, andreportingrequirements 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 enteredupon 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. B022, Gas Boiler #7

Operations, Property and/or Equipment Description:

100,000 lb/hr natural gas-fired boiler with Low-NOx burners, FGR and economizer rated at 125 mmBtu/hr

The terms and conditions of this permit supercede the terms and conditions of Permit No. P0108095 issued May 23, 2011.

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 operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	Nitrogen oxide (NOx) emissions shall not exceed0.0375 lbpermmBtu and 4.68 lbs/hr, as a rolling, 30-day average, and 20.49 tons/year. Carbon monoxide (CO) emissions shall not exceed 10.29 lbs/hr and 45.07 tons/year. Particulate emissions shall not exceed 10.95 tons/year. Visible particulate emissionsshall not exceed 5% opacity (as a six -minute average), except for one six-minute exemption period in any hour when up to 27% is permissible and during periods of boiler startups, shutdowns and/or reported malfunctions. See b)(2)a.

b.	OAC rule 3745-31-05(A)(3) as effective 11/30/2001	Volatile organic compounds (VOC) emissions shall not exceed 0.67 lb/hr and 2.93 tons/year. Sulfur dioxide (SO2) emissions shall not exceed 0.07 lb/hr and 0.31 ton/year. See b)(2)d. below.
c.	OAC rule 3745-31-05(A)(3)(b) as effective 12/01/06	See b)(2)e. below.
d.	OAC rule 3745-17-07(A)	The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb per million Btu of heat input.
f.	40 CFR Part 60 Subpart Db	The nitrogen oxide emission limitation specified by this rule is less stringent than the nitrogen oxide emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-110-03(C)	Nitrogen oxide (NOx) emissions shall not exceed 0.1 lbpermmBtu based on a 24-hr daily heat input-weighted average during the period of May through September.

(2) Additional Terms and Conditions

a. The use of natural gas as fuel for burning in this emissions unit is required to satisfy the BAT requirements in OAC 3745-31-05. The emissions unit is also equipped with a Low Nox burner.

b. Each continuous NOx monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2. At least 45 days before commencing certification testing of the continuous NOx monitoring system(s), the permittee shall develop and maintain a written quality assurance/quality control plan designed to ensure continuous valid and representative readings of NOx emissions from the continuous monitor(s), in units of the applicable standard(s). 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 NO_x monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; and to conduct relative accuracy test audits in units of the standard(s), in accordance with and at the frequencies required per 40 CFR Part 60.

c. OAC rule 3745-18-06 does not establish a sulfur dioxide emission limitation for this "fuel burning equipment" because it only employs natural gas as fuel.

d. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (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 the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) 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 OAC rule 3745-31-05, these emission limitations/control measures no longer apply.

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

The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled emissions of VOC and SO2 from this emissions unit since the potential to emit for VOC and SO2 emissions are less than ten tons per year.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

(2) The permittee shall operate and maintain equipment to continuously monitor and record NO_x emissions from this emissions unit pursuant to 40 CFR Part 60, Subpart Db.

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(2) The permittee shall record and maintain records of the amount of fuel combusted each day.

(3) The permittee shall install, calibrate, maintain, and operate a continuous monitoring system, and record the output of the system, for measuring nitrogen oxides emissions discharged to the atmosphere.

(4) The continuous monitoring system required under paragraph (b) of 40 CFR Part 60.48b shall be operated and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments.

(5) The 1-hour average nitrogen oxides emission rates measured by the continuous nitrogen oxides monitor required by paragraph (b) of 40 CFR Part 60.48b and required under 40 CFR Part 60.13(h) shall be expressed in ng/J or lb/million Btu heat input and shall be used to calculate the average emission rates. The 1-hour averages shall be calculated using the data points required under 40 CFR Part 60.13(h). At least 2 data points must be used to calculate each 1-hour average.

(6) For natural gas usage the analyzer span value for nitrogen oxides is 200 ppm.

(7) When nitrogen oxides emission data are not obtained because of continuous monitoring system breakdowns, repairs, calibration checks and zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7, Method 7A, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.

(8) Except as provided under paragraph (p) of 40 CFR Part 60.49b, the permittee shall maintain records of the following information for each steam generating unit operating day:

a. Calendar date.

b. The average hourly nitrogen oxides emission rates (expressed as NO_2) (ng/J or lb/million Btu heat input) measured.

c. The 30-day average nitrogen oxides emission rates (ng/J or lb/million Btu heat input) calculated at the end of each steam generating unit operating day from the measured hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days.

d. Identification of the steam generating unit operating days when the calculated 30-day average nitrogen oxides emission rates are in excess of the nitrogen oxides emissions standards under 40 CFR Part 60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken.

e. The 24-hour average nitrogen oxides emission rates (ng/J or lb/million Btu heat input) calculated at the end of each steam generating unit operating day from the measured hourly nitrogen oxide emission rates for the time period of May through September.

f. Identification of the steam generating unit operating days when the calculated 24-hour average nitrogen oxides emission rates are in excess of the nitrogen oxides emissions standards under OAC rule 3745-11-03, with the reasons for such excess emissions as well as a description of corrective actions taken.

g. Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken.

h. Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data.

i. Identification of "F" factor used for calculations, method of determination, and type of fuel combusted.

j. Identification of the times when the pollutant concentration exceeded full span of the continuous monitoring system.

k. Description of any modifications to the continuous monitoring system that could affect the ability of the continuous monitoring system to comply with Performance Specification 2 or 3.

l. Results of daily CEMS drift tests and quarterly accuracy assessments as required under 40 CFR Part 60 appendix F, Procedure 1.

(9) Prior to the installation of the continuous NO_x 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 2. The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous NO_x monitoring system meets the requirements of Performance Specification 2. Once received, the letter(s)/document(s) of certification shall be maintained on-site and shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

(10) The permittee shall install, operate, and maintain equipment to continuously monitor and record NO_x emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

The permittee shall maintain records of data obtained by the continuous NO_x monitoring system including, but not limited to:

a. emissions of NO_x in parts per million on an instantaneous (one-minute) basis;

b. emissions of NO_x in pounds per hour and in all units of the applicable standard(s) in the appropriate averaging period;

c. results of quarterly cylinder gas audits;

d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);

f. hours of operation of the emissions unit, continuous NO_x monitoring system, and control equipment;

g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NO_x monitoring system;

h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NO_x monitoring system; as well as,

i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

e) Reporting Requirements

(1) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NO_x monitoring system:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, 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 all instances of NO_x emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapters 3745-14 and 3745-110, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).

b. These quarterly reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall include the following:

i. the facility name and address;

ii. the manufacturer and model number of the continuous NO_x and other associated monitors;

iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;

iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;

v. the total NO_x emissions for the calendar quarter (tons);

vi. the total operating time (hours) of the emissions unit;

vii. the total operating time of the continuous NO_x monitoring system while the emissions unit was in operation;

viii. results and date of quarterly cylinder gas audits;

ix. unless previously submitted, results and date of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));

x. unless previously submitted, the results of any relative accuracy test audit showing the continuous NO_x monitor out-of-control and the compliant results following any corrective actions;

xi. the date, time, and duration of any/each malfunction** of the continuous NO_x monitoring system, emissions unit, and/or control equipment;

xii. the date, time, and duration of any downtime** of the continuous NO_x monitoring system and/or control equipment while the emissions unit was in operation; and

xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

** each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit

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

a. construction date (no later than 30 days after such date);

b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

c. actual start-up date (within 15 days after such date); and,

d. date of performance testing (if required, at least 30 days prior to testing).

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

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
Lazarus Government Center
50 West Town Street, Suite 700
P.O.Box1049
Columbus, Ohio 43216-1049

f) Testing Requirements

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

a. Emission Limitation -
0.020 lb/mmBtu of particulate emissions

Applicable Compliance Method -
Compliance shall be based upon multiplying the maximum hourly gas burning capacity of the emissions unit (0.122549 mmcf/hr) by the U.S. EPA reference document AP-42, 5th edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2(7/98) emission factor for particulate emissions (7.6 lbs of PE/mmcf) and dividing by the maximum hourly heat input capacity of the emissions unit (125.0 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the lb of particulate/mmBtu emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

b. Emission Limitation -
10.95 tons/yearof particulate emissions

Applicable Compliance Method -
Compliance with the annual limitation shall be assumed as long as compliance with the lb of particulate per mmBtu limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8,760 operating hrs/year, and then dividing by 2,000 lbs/ton).

c. Emission Limitation -
0.0375 lbpermmBtu and 4.68 lbs/hr of NOx emissions as a rolling, 30-day average

Applicable Compliance Method –

For the initial compliance test, nitrogen oxides from the steam generating unit are monitored for 30 successive steam generating unit operating days and the 30-day average emission rate is used to determine compliance with the nitrogen oxides emission limit. The 30-day average emission rate is calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period in units of lb/mmBtu. This lb/mmBtu emission rate is multiplied by the hourly heat input of the emissions unit (mmBtu/hr) to arrive at the lb/hr emission rate. Following the date on which the initial performance test is completed or required to be completed under. 40 CFR 60.8 whichever date comes first, the owner or operator of an affected facility which has a heat input capacity of 73 MW (250 million Btu/hour) or less and which combusts natural gas, distillate oil, or residual oil having a nitrogen content of 0.30 weight percent or less shall upon request determine compliance with the nitrogen oxides emission limit through the use of a 30-day performance test. During periods when performance tests are not requested, nitrogen oxides emissions data collected pursuant to Sec. 60.48b(g)(1) or Sec. 60.48b(g)(2) are used to calculate a 30-day rolling average emission rate on a daily basis and used to prepare excess emission reports, but will not be used to determine compliance with the nitrogen oxides emission limits. A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all of the hourly nitrogen oxides emission data for the preceding 30 steam generating unit operating days.

Ongoing compliance with the NOx emissions limitations contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the monitoring and record keeping section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60.

If required, the permittee shall demonstrate compliance with the emission limitation in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7, 7A, 7C, 7D, or 7E, and any additional approved USEPA methods as applicable.

d. Emission Limitation -
20.49 tons/year of NOx emissions

Applicable Compliance Method -
Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation determined in f)(1)c is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8,760 operating hrs/year, and then dividing by 2,000 lbs/ton).

e. Emission Limitation -
10.29 lbs/hr of CO emissions

Applicable Compliance Method -
Compliance shall be based upon multiplying the maximum hourly gas burning capacity of the emissions unit (0.122549 mmcf/hr) by the U.S. EPA reference document AP-42, 5th edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-1(7/98) emission factor for CO emissions (84 lbs of CO/mmcf).

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

f. Emission Limitation -
45.07 tons/year of CO emissions

Applicable Compliance Method -
Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8,760 operating hrs/year, and then dividing by 2,000 lbs/ton).

g. Emission Limitation –

Visible particulate emissions shall not exceed 5% opacity (as a six -minute average), except for one six-minute exemption period in any hour when up to 27% is permissible and during periods of boiler startups, shutdowns and/or reported malfunctions.

Applicable Compliance Method –
Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in U.S. EPA method 9 of 40 CFR Part 60, Appendix A.

No visible emission observations are specifically required to demonstrate compliance with these emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

h. Emission Limitation -
0.1 lbpermmBtu of NOx emissions based on a 24-hr daily heat input-weighted average during the period of May through September

Applicable Compliance Method –

Compliance with the NOx emissions limitations shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60. Determine the twenty-four-hour daily heat input-weighted average NOx emission rate based on the heat input-weighted average of the block hourly arithmetic average emission rates during each twenty-four-hour daily period from twelve a.m. to twelve a.m. the following day

using continuous emissions monitor data. The block hourly heat input-weighted average emission rate must be calculated for each one-hour period starting with the period twelve a.m. to one a.m. and continuing through until the last period eleven p.m. to twelve a.m.; or, starting with the period twelve p.m. to one p.m. and continuing through the last period eleven a.m. to twelve p.m.

In accordance with OAC rule 3745-110-05(A), the permittee shall demonstrate compliance with the applicable emission limit by performing emission tests in accordance with USEPA Method 7, 7A, 7C, 7D, or 7E, and any additional approved USEPA methods as applicable.

i. Emission Limitation:

Volatile organic compounds (VOC) emissions shall not exceed 0.67 lb/hr.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be determined by multiplying an emission factor of 5.5 lbs of VOC/mm cu. ft. by the emissions unit's maximum hourly natural gas firing rate (0.122549 mmcf/hr). The emission factor is specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

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

j. Emission Limitation:

Volatile organic compounds (VOC) emissions shall not exceed 2.93 tons/year.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8760 hours of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

k. Emission Limitation:

Sulfur dioxide (SO2) emissions shall not exceed 0.07 lb/hr.

Applicable Compliance Method:

Compliance with the lb/hr emission limitation shall be determined by multiplying an emission factor of 0.6 lb of SO2/mm cu. ft. by the emissions unit's maximum hourly natural gas firing rate (0.122549 mmcf/hr). The emission factor is specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 (7/98).

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

l. Emission Limitation:

Sulfur dioxide (SO2) emissions shall not exceed 0.31 ton/year.

Applicable Compliance Method:

The annual emission limitation was established by multiplying the hourly emission rate by 8760 hours of operation per year and dividing by 2000 pounds per ton. Therefore, compliance with the annual emission limitation shall be assumed provided compliance is maintained with the pounds per hour limitation.

(2) Within 60 days of achieving normal operation of the emissions unit, the permittee shall conduct certification tests of the continuous NO_x monitoring system in units of the applicable standard(s), to demonstrate compliance with 40 CFR Part 60, Appendix B, Performance Specification 2 ; and ORC section 3704.03(I).

Personnel from the Ohio EPA Central Office and 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. Two copies of the test results shall be submitted to Ohio EPA, one copy to the appropriate Ohio EPA District Office or local air agency and one copy to Ohio EPA Central Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification of the continuous NO_x monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2 ; and ORC section 3704.03(I).

(3) 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 180 days of achieving normal operation of the emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for nitrogen oxide.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass nitrogen oxide emission limitation: Methods 7, 7A, 7C, 7D or 7E of 40 CFR, Part 60, Appendix A. [Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.]

d. The emission testing shall be conducted while the emission unit is operating at or as close as possible to one hundred per cent load.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland DAQ. 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 Cleveland DAQ's refusal to accept the results of the emission test(s).

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

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland DAQ 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 Cleveland DAQ.

(4) For the compliance demonstrations performed pursuant to paragraph (A) of OAC rule 3745-110-05, the owner or operator shall obtain any additional test data (i.e., flow rates, oxygen concentrations, moisture contents, etc.), continuous diluent monitoring data (carbon dioxide or oxygen), or source fuel usage or horsepower data, concurrent with the required compliance demonstration in order to convert the emission test results or monitoring data to the units of the applicable limit. Compliance demonstrations shall be performed that are representative of the normal operating modes, including fuel types or fuel blends employed and shall exclude periods of startup, shutdown, malfunction, and low load operating conditions.

g) Miscellaneous Requirements

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