



Environmental Protection Agency

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

12/28/2011

Donald Janes
MARION CORRECTIONAL INSTITUTION
940 MARION WILLIAMSPORT RD
PO BOX 57
MARION, OH 43302

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0351010182
Permit Number: P0108447
Permit Type: Renewal
County: Marion

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very 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

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-NWDO



FINAL

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

Facility ID:	0351010182
Permit Number:	P0108447
Permit Type:	Renewal
Issued:	12/28/2011
Effective:	12/28/2011
Expiration:	12/28/2016



Division of Air Pollution Control
Permit-to-Install and Operate
for
MARION CORRECTIONAL INSTITUTION

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Authorization

Facility ID: 0351010182
Application Number(s): A0042115
Permit Number: P0108447
Permit Description: Renewal PTIO for 2 boilers (emissions units B005 and B006) and 2 backup generators (emissions units P001 and P002).
Permit Type: Renewal
Permit Fee: \$0.00
Issue Date: 12/28/2011
Effective Date: 12/28/2011
Expiration Date: 12/28/2016
Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

MARION CORRECTIONAL INSTITUTION
940 MARION WILLIAMSPORT ROAD
Marion, OH 43302

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

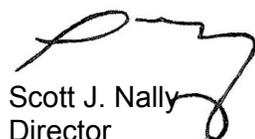
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency


Scott J. Nally
Director



Authorization (continued)

Permit Number: P0108447
Permit Description: Renewal PTIO for 2 boilers (emissions units B005 and B006) and 2 backup generators (emissions units P001 and P002).

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

Emissions Unit ID: P001
Company Equipment ID: Generator #2
Superseded Permit Number: P0087365
General Permit Category and Type: Not Applicable

Emissions Unit ID: P002
Company Equipment ID: Generator #1
Superseded Permit Number: P0087365
General Permit Category and Type: Not Applicable

Group Name: Boilers

Emissions Unit ID:	B005
Company Equipment ID:	Boiler #1
Superseded Permit Number:	P0087365
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B006
Company Equipment ID:	Boiler #2
Superseded Permit Number:	P0087365
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northwest District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting¹ a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

¹Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.

C. Emissions Unit Terms and Conditions

1. P001, Generator #2

Operations, Property and/or Equipment Description:

1490 horsepower (9.5MMBtu/hr) diesel fuel fired generator (generator 2).

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

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

a. None.

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

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

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)	3.07 lbs sulfur dioxide (SO ₂)/hr 30.40 lbs nitrogen oxides (NO _x)/hr 8.08 lbs carbon monoxide (CO)/hr; 0.60 ton CO/yr 0.60 lb particulate emissions (PE)/hr; 0.24 ton PE/yr 0.90 lb volatile organic compounds (VOC)/hr; 0.36 ton VOC/yr Visible PE shall not exceed 10% opacity as a six-minute average, except as during start-up and shutdown See b)(2)a. and b)(2)c.
b.	OAC rule 3745-31-05(D)	12.16 tons NO _x per rolling, 12-month period

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		1.23 tons SO ₂ per rolling, 12-month period See b)(2)a. and c)(1)
c.	OAC rule 3745-17-07(A)	See b)(2)b.
d.	OAC rule 3745-17-11(B)(5)(b)	0.062 lb/MMBtu
e.	OAC rule 3745-18-06(G)	See b)(2)b.

(2) Additional Terms and Conditions

a. The permittee has requested the following federally enforceable emission limitations based on the hours of operation restriction [see c)(1)] for purposes of avoiding Title V applicability:

- i. 12.16 tons NO_x per rolling, 12-month period; and
- ii. 1.23 tons SO₂ per rolling, 12-month period.

The annual hours of operation restriction also effectively restricts emissions of CO, VOC and PE.

- b. The emission limitation specified by this rule is less stringent than the emission limitation established by OAC rule 3745-31-05(A)(3).
- c. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).

c) Operational Restrictions

(1) The maximum annual hours of operation for this emissions unit shall not exceed 800 hours per year, based upon a rolling, 12-month summation of the operating hours. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the hours of operation, upon issuance of this permit

(2) The permittee shall combust only diesel fuel in this emissions unit.

(3) The sulfur content of the diesel fuel shall contain no more than 0.32 weight percent sulfur.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. the hours of operation;
- b. the rolling, 12-month hours of operation;

- c. the calculated monthly emission rate for PE using the following equation:
$$\text{PE emissions (in tons)} = [\text{hours of operation}] \times [\text{potential hourly PE emissions}] \times [1 \text{ ton}/2000 \text{ lbs}] = [d)(1)a.] \times [0.6 \text{ lb PE/hr}] \times [1 \text{ ton}/2000 \text{ lbs}];$$
 - d. the calculated monthly emission rate for CO using the following equation:
$$\text{CO emissions (in tons)} = [\text{hours of operation}] \times [\text{potential hourly CO emissions}] \times [1 \text{ ton}/2000 \text{ lbs}] = [d)(1)a.] \times [8.08 \text{ lbs CO/hr}] \times [1 \text{ ton}/2000 \text{ lbs}];$$
 - e. the calculated monthly emission rate for NOx using the following equation:
$$\text{NOx emissions (in tons)} = [\text{hours of operation}] \times [\text{potential hourly NOx emissions}] \times [1 \text{ ton}/2000 \text{ lbs}] = [d)(1)a.] \times [30.40 \text{ lbs NOx/hr}] \times [1 \text{ ton}/2000 \text{ lbs}];$$
 - f. the calculated monthly emission rate for SO2 using the following equation:
$$\text{SO2 emissions (in tons)} = [\text{hours of operation}] \times [\text{potential hourly SO2 emissions}] \times [1 \text{ ton}/2000 \text{ lbs}] = [d)(1)a.] \times [6.79 \text{ lbs SO2/hr}] \times [1 \text{ ton}/2000 \text{ lbs}];$$
 - g. the calculated monthly emission rate for VOC using the following equation:
$$\text{VOC emissions (in tons)} = [\text{hours of operation}] \times [\text{potential hourly VOC emissions}] \times [1 \text{ ton}/2000 \text{ lbs}] = [d)(1)a.] \times [0.90 \text{ lb VOC/hr}] \times [1 \text{ ton}/2000 \text{ lbs}];$$
 - h. the rolling, 12-month emission rates for NOx and SO2, in tons; and
 - i. the annual, year-to-date emission rates for PE, CO and VOC.
- (2) For each day during which the permittee burns a fuel other than diesel fuel the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
 - (3) The permittee shall use records of fuel supplier certification to demonstrate compliance with the operational restriction in c)(3). Records of fuel supplier certification shall include the following information:
 - a. the name of the supplier; and
 - b. a statement from the oil supplier that the oil complies with the sulfur content restriction specified in c)(3).
- e) Reporting Requirements
- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the rolling, 12-month hours of operation limitation of 800;
 - ii. the rolling, 12-month NO_x emission limitation of 12.16 tons;
 - iii. the rolling, 12-month SO₂ emission limitation of 1.23 tons; and
 - iv. the sulfur content restriction described in c)(3).
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

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

- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than diesel fuel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (4) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
- a. Emission Limitation:
 - 1.23 tons SO₂ per rolling, 12-month period

Applicable Compliance Method:

Compliance with the 12-month rolling emission limitation shall be determined by the recordkeeping required in d)(1).

b. Emission Limitation:

12.16 tons NO_x per rolling, 12-month period

Applicable Compliance Method:

Compliance with the 12-month rolling emission limitation shall be determined by the recordkeeping required in d)(1).

c. Emission Limitation:

3.07 lbs SO₂/hr

Applicable Compliance Method:

The hourly emission limitation was developed by multiplying an emission factor of 1.01 (S) lb SO₂/MMBtu from AP-42, Table 3.4-1 (revised 10/96) by the maximum percentage of sulfur (S=0.32), by weight, in the diesel fuel by the maximum heat input of the generator (9.5 MMBtu/hr). Therefore provided compliance is shown with the maximum sulfur content of 0.32 weight percent, compliance with the hourly limitation shall also be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly allowable SO₂ emission limitation in accordance with the test methods and procedures in Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:

30.4 lbs NO_x/hr

Applicable Compliance Method:

The hourly emission limitation was developed by multiplying the maximum fuel input rate of 9.5 MMBtu/hr and an emission factor of 3.2 lbs/MMBtu [from AP-42, Section 3.4 (10/96)].

If required, the permittee shall demonstrate compliance with the hourly allowable NO_x emission limitation by testing in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

e. Emission Limitation:

8.08 lbs CO/hr; 3.23 tons CO/yr

Applicable Compliance Method:

The hourly emission limitation was developed by multiplying the maximum fuel input rate of 9.5MMBtu/hr and an emission factor of 0.85 lb/MMBtu [from AP-42, Section 3.4 (10/96)].

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation in accordance with the test methods and procedures in Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A.

Compliance with the tons CO/yr limitation shall be demonstrated based upon the recordkeeping requirements in d)(1).

f. Emission Limitation:

0.90 lb VOC/hr; 0.36 ton VOC/yr

Applicable Compliance Method:

The hourly emission limitation was developed by multiplying the maximum fuel input rate of 9.5MMBtu/hr and an emission factor of 0.09 lb/MMBtu [from AP-42, Section 3.4 (10/96)].

If required, the permittee shall demonstrate compliance with the hourly allowable VOC emission limitation in accordance with the test methods and procedures in Methods 1-4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitation shall be determined by the recordkeeping required in d)(1).

g. Emission Limitation:

0.60 lb PE/hr; 0.24 ton PE/yr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the performance standard of 0.062 lb PE/MMBtu/hr by the maximum fuel input rate of 9.5 MMBtu/hr. If required, the permittee shall demonstrate compliance with the hourly emission limitation through testing conducted in accordance with the test methods and procedures in Methods 1-5 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the appropriate Ohio EPA District Office or local air agency.

Compliance with the annual emission limitation shall be determined by the recordkeeping required in d)(1).

h. Emission Limitation:

0.062 lb PE/MMBtu

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the performance standard in accordance with the methods specified in OAC rule 3745-17-03(B)(9).

i. Emission Limitation:

Visible PE shall not exceed 20% opacity as a six minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by testing in accordance with the methods specified in OAC rule 3745-17-03(B)(1).

g) Miscellaneous Requirements

(1) None.

2. P002, Generator #1

Operations, Property and/or Equipment Description:

1490 hp (10 MMBtu/hr) diesel fuel fired generator (generator 1)

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

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

a. None.

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

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

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)	3.23 lbs sulfur dioxide (SO ₂)/hr 32.0 lbs nitrogen oxides (NO _x)/hr 8.50 lbs carbon monoxide (CO)/hr 0.90 lb volatile organic compounds (VOC)/hr 0.62 lb particulate emissions (PE)/hr 0.57 lb particulate matter less than 10 microns in size (PM ₁₀)/hr Visible PE shall not exceed 10% opacity as a 6-minute average, except as provided by rule See b)(2)a.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D)	1.29 tons SO ₂ per rolling, 12-month period 12.80 tons NO _x per rolling, 12-month period 3.40 tons CO per rolling, 12-month period 0.36 ton VOC per rolling, 12-month period 0.25 ton PE per rolling, 12-month period 0.23 ton PM ₁₀ per rolling, 12-month period See b)(2)b.
c.	OAC rule 3745-17-07(A)	See b)(2)c.
d.	OAC rule 3745-17-11(B)(5)(b)	0.062 lb PE/MMBtu
e.	OAC rule 3745-18-06(G)	See b)(2)d.

(2) Additional Terms and Conditions

- a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
- b. The permittee has requested the following federally enforceable emission limitations based on the hours of operation restriction [see c)(1)] for purposes of avoiding Title V applicability:
 - i. 12.80 tons NO_x per rolling, 12-month period; and
 - ii. 1.29 tons SO₂ per rolling, 12-month period.

The annual hours of operation restriction also effectively restrict emissions of CO, VOC, PE and PM₁₀.
- c. The emissions limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
- d. This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(B).

c) Operational Restrictions

- (1) The maximum annual hours of operation for this emissions unit shall not exceed 800 hours per year, based upon a rolling, 12-month summation of the operating hours. This emissions unit has been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the hours of operation, upon issuance of this permit
- (2) The permittee shall combust only diesel fuel in this emissions unit.
- (3) The sulfur content of the diesel fuel shall contain no more than 0.32 weight percent sulfur.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the hours of operation;
 - b. the rolling, 12-month hours of operation;
 - c. the calculated monthly emission rate for PE using the following equation:
$$\text{PE emissions (in tons)} = [\text{hours of operation}] \times [\text{potential hourly PE emissions}] \times [1 \text{ ton}/2000 \text{ lbs}] = [d](1)a.] \times [0.62 \text{ lb PE/hr}] \times [1 \text{ ton}/2000 \text{ lbs}];$$
 - d. the calculated monthly emission rate for PM10 using the following equation:
$$\text{PM10 emissions (in tons)} = [\text{hours of operation}] \times [\text{potential hourly PM10 emissions}] \times [1 \text{ ton}/2000 \text{ lbs}] = [d](1)a.] \times [0.57 \text{ lb PM10/hr}] \times [1 \text{ ton}/2000 \text{ lbs}];$$
 - e. the calculated monthly emission rate for CO using the following equation:
$$\text{CO emissions (in tons)} = [\text{hours of operation}] \times [\text{potential hourly CO emissions}] \times [1 \text{ ton}/2000 \text{ lbs}] = [d](1)a.] \times [8.50 \text{ lbs CO/hr}] \times [1 \text{ ton}/2000 \text{ lbs}];$$
 - f. the calculated monthly emission rate for NOx using the following equation:
$$\text{NOx emissions (in tons)} = [\text{hours of operation}] \times [\text{potential hourly NOx emissions}] \times [1 \text{ ton}/2000 \text{ lbs}] = [d](1)a.] \times [12.8 \text{ lbs NOx/hr}] \times [1 \text{ ton}/2000 \text{ lbs}];$$
 - g. the calculated monthly emission rate for SO2 using the following equation:
$$\text{SO2 emissions (in tons)} = [\text{hours of operation}] \times [\text{potential hourly SO2 emissions}] \times [1 \text{ ton}/2000 \text{ lbs}] = [d](1)a.] \times [3.23 \text{ lbs SO2/hr}] \times [1 \text{ ton}/2000 \text{ lbs}];$$
 - h. the calculated monthly emission rate for VOC using the following equation:
$$\text{VOC emissions (in tons)} = [\text{hours of operation}] \times [\text{potential hourly VOC emissions}] \times [1 \text{ ton}/2000 \text{ lbs}] = [d](1)a.] \times [0.90 \text{ lb VOC/hr}] \times [1 \text{ ton}/2000 \text{ lbs}];$$
 and

unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than diesel fuel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

1.29 tons SO₂ per rolling, 12-month period
12.80 tons NO_x per rolling, 12-month period
3.40 tons CO per rolling, 12-month period
0.36 ton VOC per rolling, 12-month period
0.25 ton PE per rolling, 12-month period
0.23 ton PM₁₀ per rolling, 12-month period

Applicable Compliance Method:

Compliance with the emission limitations shall be demonstrated based upon the recordkeeping requirements in d)(1).

b. Emission Limitation:

3.23 lbs SO₂/hr

Applicable Compliance Method:

The hourly allowable SO₂ emission limitation was established by multiplying an emission factor of 1.01(S) lb SO₂/MMBtu from AP-42, Table 3.4-1 (revised 10/96) by the maximum percent of sulfur (S=0.32), by weight, in the diesel fuel by the maximum heat input of the generator (10 MMBtu/hr). Therefore, provided compliance is shown with the maximum sulfur content of 0.32 weight percent, compliance with the hourly allowable SO₂ limitation shall also be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly allowable SO₂ emission limitation in accordance with the test methods and procedures in Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the appropriate Ohio EPA District Office or local air agency.

c. Emission Limitation:

32.0 lbs NO_x/hr

Applicable Compliance Method:

The hourly emission limitation was developed by multiplying the maximum fuel input rate of 10 MMBtu/hr and an emission factor of 3.2 lbs NO_x/MMBtu from AP-42, Section 3.4 (revised 10/96).

If required, the permittee shall demonstrate compliance with the hourly allowable NO_x emission limitation by testing in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the appropriate Ohio EPA District Office or local air agency.

d. Emission Limitation:

8.50 lbs CO/hr

Applicable Compliance Method:

The hourly emission limitation was developed by multiplying the maximum fuel input rate of 10 MMBtu/hr and an emission factor of 0.85 lb CO/MMBtu from AP-42, Section 3.4 (revised 10/96).

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation in accordance with the test methods and procedures in Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the appropriate Ohio EPA District Office or local air agency.

e. Emission Limitation:

0.90 lb VOC/hr

Applicable Compliance Method:

The hourly emission limitation was developed by multiplying the maximum fuel input rate of 10 MMBtu/hr and an emission factor of 0.09 lb VOC/MMBtu from AP-42, Section 3.4 (revised 10/96).

If required, the permittee shall demonstrate compliance with the hourly emission limitation through testing conducted in accordance with the test methods and procedures in Methods 1-4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the appropriate Ohio EPA District Office or local air agency.

f. Emission Limitation:

0.62 lb PE/hr

Applicable Compliance Method:

The hourly emission limitation was established by multiplying the performance standard of 0.062 lb PE/MMBtu/hr by the maximum fuel input rate of 10

MMBtu/hr. If required, the permittee shall demonstrate compliance with the hourly emission limitation through testing conducted in accordance with the test methods and procedures in Methods 1-5 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the appropriate Ohio EPA District Office or local air agency.

g. Emission Limitation:

0.062 lb PE/MMBtu

Applicable Compliance Method:

If required, compliance with the lb/MMBtu PE limitation shall be demonstrated in accordance with methods specified in OAC rule 3745-17-03(B)(9).

h. Emission Limitation:

0.57 lb PM10/hr

Applicable Compliance Method:

The hourly emission limitation was developed by multiplying the maximum fuel input rate of 10 mmBTU/hr and an emission factor of 0.057 lbs PM10/MMBTU using AP-42, Chapter 3.4, Table 3.4-1 (revised 10/96).

If required, the permittee shall demonstrate compliance with the hourly emission limitation through testing conducted in accordance with the test methods and procedures in Methods 201/201A and 202 of 40 CFR, Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the appropriate Ohio EPA District Office or local air agency.

i. Emission Limitation:

Visible PE shall not exceed 20% opacity as a six minute average, except as provided by rule

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance by testing in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Boilers: B005,B006

EU ID	Operations, Property and/or Equipment Description
B005	44 mmBTU/hr natural gas and/or #2 fuel oil fired boiler
B006	44 mmBTU/hr natural gas and/or #2 fuel oil fired boiler

- a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
- (1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
- a. None.
- (2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
- a. b)(1)a., b)(2)a., c)(2), c)(3), d)(1), d)(3), e)(2) and f)(1)a.
- 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(D)	0.026 lb sulfur dioxide (SO ₂)/hr; 0.11 ton SO ₂ /yr, when burning natural gas 14.29 lbs SO ₂ /hr; 62.55 tons SO ₂ per rolling, 12-month period, when burning #2 fuel oil, based on a combined hours of operation restriction for B005 and B006 See b)(2)a. and c)(1)
b.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-10(B)	0.020 lb PE/mmBTU
d.	OAC rule 3745-18-06(D)	See b)(2)b.

- (2) Additional Terms and Conditions
 - a. The permittee has requested a federally enforceable limitation of 62.55 tons SO₂ per rolling, 12-month period, based on a combined hours of operation restriction for B005 and B006 [See c)(2)] for purposes of limiting potential to emit to avoid Title V applicability.
 - b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D).
- c) Operational Restrictions
 - (1) The permittee shall burn only natural gas and/or #2 fuel oil in these emissions units.
 - (2) The sulfur content of the #2 fuel oil shall contain no more than 0.32 weight percent sulfur.
 - (3) The maximum annual hours of operation for emissions units B005 and B006, combined, shall not exceed 8760 hrs/yr, based upon a rolling, 12-month summation of the operating hours while burning #2 fuel oil. These emissions unit have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the hours of operation, upon issuance of tis permit.
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall maintain monthly records of the following information for emissions units B005 and B006, combined, while burning #2 fuel oil:
 - a. the number of operating hours;
 - b. the rolling, 12-month hours of operation;
 - c. the calculated monthly emission rate for SO₂ using the following equation:
$$\text{SO}_2 \text{ emissions in tons} = [\text{hours of operation}] \times [\text{potential hourly SO}_2 \text{ emissions}] \times [1 \text{ ton}/2000 \text{ lbs}] = [d)(1)a.] \times [14.29 \text{ lbs SO}_2/\text{hr}] \times [1 \text{ ton}/2000 \text{ lbs}]; \text{ and}$$
 - d. the rolling, 12-month SO₂ emission rates, in tons.
 - (2) For each day during which the permittee burns a fuel other than natural gas and/or #2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
 - (3) The permittee shall use records of fuel supplier certification to demonstrate compliance with the operational restriction in c)(2). Records of fuel supplier certification shall include the following information:
 - a. the name of the oil supplier; and
 - b. a statement from the oil supplier that the oil complies with the sulfur content restriction specified in c)(2).

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
 - i. the rolling, 12-month hours of operation limitation of 8760, combined for emissions unit B005 and B006, when burning #2 fuel oil;
 - ii. the rolling, 12-month SO₂ emission limitation of 62.55 tons, combined for emissions units B005 and B006, when burning #2 fuel oil; and
 - iii. the sulfur content restriction described in c)(2).
 - b. the probable cause of each deviation (excursion);
 - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

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

- (3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or #2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation:
0.026 lb SO₂/hr; 0.11 ton SO₂/yr when burning natural gas

Applicable Compliance Method:

The hourly emission limitation was developed by dividing the maximum heat input of 44 MMBtu/hr by the natural gas heating value of 1020 MMBtu/MMscf and multiplying by an emission factor of 0.60 lb SO₂/MMscf from AP-42, Table 1.4-2 (revised 7/98).

If required, the permittee shall demonstrate compliance with the hourly emission limitation by testing in accordance with Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was developed by multiplying the maximum hourly emission limitation by a maximum operating schedule of 8760 hrs and dividing by 2000 lb/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual limitation shall also be demonstrated.

b. Emission Limitation:

14.28 lbs SO₂/hr; 62.55 tons SO₂ per rolling, 12-month period, when burning #2 fuel oil

Applicable Compliance Method:

The hourly emission limitation was established by multiplying an emission factor of 142(S) lb SO₂/1000 gallon from AP-42, Table 1.3-1 (revised 5/10) by the maximum percent of sulfur (S=0.32), by weight, in the #2 fuel oil by the maximum heat input of the 44 MMBtu/hr and dividing by the maximum heat content of 0.14 MMBtu/gallon. Therefore, provided compliance is shown with the maximum sulfur content of 0.32 weight percent, compliance with the hourly emission limitation shall also be demonstrated.

If required, the permittee shall demonstrate compliance with the hourly allowable SO₂ emission limitation in accordance with the test methods and procedures in Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A.

Compliance with the emission limitations shall be demonstrated based upon the recordkeeping requirements in d)(1).

c. Emission Limitation:

0.02 lb PE/mmBTU

Applicable Compliance Method:

When firing natural gas, the permittee may demonstrate compliance with this limitation by multiplying the hourly natural gas consumption rate in MMcf/hr by the emissions factor of 1.90 lbs PE (filterable)/MMcf from AP-42, Table 1.4-2 (revised 7/98) and then dividing by the heat input capacity of the boiler in MMBtu/hr.

When firing #2 fuel oil and/or a combination of #2 fuel oil and natural gas, the permittee shall demonstrate compliance by multiplying the hourly fuel oil consumption rate in gallons/hr by the emission factor of 2.0 lbs PE (filterable)/1000 gallons of oil used from AP-42, Table 1.3-1 (revised 5/10) and dividing by the heat input capacity of the boiler in MMBtu/hr.

If required, compliance with the lb/MMBtu PE limitation shall be demonstrated in accordance with methods specified in OAC rule 3745-17-03(B)(9).

d. Emission Limitation:

Visible PE shall not exceed 20% opacity as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.