



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
MAHONING COUNTY**

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 02-18527

DATE: 9/30/2003

Bulldog Boiler
Richard D. Wells
1641 Caniff
Hamtramck, MI 48212

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging 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 Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. 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, Ohio 43215

Sincerely,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

NEDO



**Permit To Install
Terms and Conditions**

**Issue Date: 9/30/2003
Effective Date: 9/30/2003**

FINAL PERMIT TO INSTALL 02-18527

Application Number: 02-18527
APS Premise Number: 0250941023
Permit Fee: **\$400**
Name of Facility: Bulldog Boiler
Person to Contact: Richard D. Wells
Address: 1641 Caniff
Hamtramck, MI 48212

Location of proposed air contaminant source(s) [emissions unit(s)]:
**500 Gypsy Lane
Youngstown, Ohio**

Description of proposed emissions unit(s):
Portable natural gas fired boiler.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) 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 above described 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

Director

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Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- 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 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 appropriate Ohio EPA District Office or local air agency. 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., 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.)

3. Records Retention Requirements

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.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized

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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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

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Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

10. 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.

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

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14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. 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 this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE	1.29
OC	2.02
NOx	18.40
CO	15.08
SO2	0.18

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Emissions Unit ID: **B001**

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-17-10(B)(1)
B001 - 42 mmBtu/hr Natural Gas- fired Portable Boiler	OAC rule 3745-31-05(A)(3)	
		OAC rule 3745-18-06(A)
		OAC rule 3745-21-08(B)
		OAC rule 3745-21-07(B) OAC rule 3745-23-06(B)
	OAC rule 3745-17-07(A)(1)	

40 CFR Part 60 Subpart Dc

Applicable Emissions
Limitations/Control Measures

Particulate emissions (PE) shall not exceed 0.007 lb/MMBTU, 0.29 lb/hr and 1.29 tons per year (TPY); Organic compound (OC) emissions shall not exceed 0.011 lb/MMBTU, 0.46 lb/hr and 2.02 TPY; Nitrogen oxide (NOx) emissions shall not exceed 0.10 lb/MMBTU, 4.20 lbs/hr and 18.40 TPY; Carbon monoxide (CO) emissions shall not exceed 0.082 lb/MMBTU, 3.44 lbs/hr and 15.08 TPY; and Sulfur dioxide (SO₂) emissions shall not exceed 0.001 lb/MMBTU, 0.04 lb/hr and 0.18 TPY.

See term A.2.e.

The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1).

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

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See term A.2.f.

The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

See term A.2.d.

The emission limitation specified by this rule is equivalent to the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

2. Additional Terms and Conditions

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of natural gas and the emissions limitations listed in term A.1 above.
- 2.b** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency (USEPA), 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency (Ohio EPA).
- 2.c** The lb/MMBTU actual heat input and tons per year emission limitations, except for SO₂, are based on the emissions unit's potentials to emit. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with these limitations.
- 2.d** The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-07(B) and 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this air permit to install.
- 2.e** Visible particulate emissions from any stack shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
- 2.f** The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3).

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revisions occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

B. Operational Restrictions

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

C. Monitoring and/or Recordkeeping Requirements

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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.

D. Reporting Requirements

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

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, Ohio 43216-3669

and to:

Ohio Environmental Protection Agency
Northeast District Office
Division of Air Pollution Control
2110 East Aurora Road
Twinsburg, Ohio 44087

2. The permittee shall notify the Director (the appropriate local air agency or District Office) in writing of any fuel burned in this emissions unit other than natural gas. The notification shall include a copy of such record and shall be sent to the Director (the appropriate local air agency or District Office) within 45 days after the deviation occurs.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:
20% opacity, as a six-minute average

Applicable Compliance Method(s):

Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 in 40 CFR, Part 60, Appendix A, and the procedures specified in OAC rule 3745-17-03(B)(1).

- b. Emission Limitation:
0.10 lb/mmBtu, 4.20 lbs/hr and 18.40 TPY NO_x emissions

Applicable Compliance Method:

The emission limitations were based upon emission factors from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-1 (7/98). Compliance with the hourly emission limitation shall be determined by converting the 100 lbs NO_x/10⁶ scf emission factor into lbs NO_x/mmBtu by dividing by 1,020 Btu/scf, and then multiplying this value by the maximum heat input rating of the boiler (42 mmBtu/hr). Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 8760 hrs/yr and dividing by 2000 lbs/ton.

- c. Emission Limitation:
0.082 lb/mmBtu, 3.44 lbs/hr and 15.08 TPY CO emissions

Applicable Compliance Method:

The emission limitations were based upon emission factors from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-1 (7/98). Compliance with the hourly emission limitation shall be determined by converting the 84 lbs CO/10⁶ scf emission factor into lbs CO/mmBtu by dividing by 1,020 Btu/scf, and then multiplying this value by the maximum heat input rating of the boiler (42 mmBtu/hr). Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 8760 hrs/yr and dividing by 2000 lbs/ton.

- d. Emission Limitation:
0.011 lb/mmBtu, 0.46 lb/hr and 2.02 TPY OC emissions

Applicable Compliance Method:

The emission limitations were based upon emission factors from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (7/98). Compliance with the hourly emission limitation shall be determined by converting the 11 lbs TOC/10⁶ scf emission factor into lbs TOC/mmBtu by dividing by 1,020 Btu/scf, and

Emissions Unit ID: **B001**

then multiplying this value by the maximum heat input rating of the boiler (42 mmBtu/hr). Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 8760 hrs/yr and dividing by 2000 lbs/ton.

- e. Emission Limitation:
 0.001 lb/mmBtu, 0.04 lb/hr and 0.18 TPY SO₂ emissions

Applicable Compliance Method:

The emission limitations were based upon emission factors from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (7/98).

Compliance with the hourly emission limitation shall be determined by converting the 0.6 lb SO₂/10⁶ scf emission factor into lbs SO₂/mmBtu by dividing by 1,020 Btu/scf, and then multiplying this value by the maximum heat input rating of the boiler (42 mmBtu/hr). Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 8760 hrs/yr and dividing by 2000 lbs/ton.

- f. Emission Limitation:
 0.007 lb/mmBtu, 0.29 lb/hr and 1.29 TPY PE

Applicable Compliance Method:

The emission limitations were based upon emission factors from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.4, Table 1.4-2 (7/98).

Compliance with the hourly emission limitation shall be determined by converting the 7.6 lb PM/10⁶ scf emission factor into lbs PM/mmBtu by dividing by 1,020 Btu/scf, and then multiplying this value by the maximum heat input rating of the boiler (42 mmBtu/hr). Compliance with the annual emission limitation shall be determined by multiplying the hourly emission limitation by 8760 hrs/yr and dividing by 2000 lbs/ton.

F. Miscellaneous Requirements

1. Notice to Relocate a Portable or Mobile Emissions Unit

Pursuant to OAC rule 3745-31-03(A)(1)(p)(i), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria are met:

- a. the portable emissions unit is equipped with the best available technology for such portable emissions unit;
- b. the portable emissions unit is operating pursuant to a currently effective permit to operate (PTO);

- c. the applicant has provided proper notice of intent to relocate the portable emissions unit to NEDO and the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site within a minimum of thirty days prior to the scheduled relocation; and
 - d. in NEDO's and the appropriate Ohio EPA District Office's or local air agency's judgement, the proposed site is acceptable under OAC rule 3745-15-07.
2. In the alternative, pursuant to OAC rule 3745-31-03(A)(1)(p)(ii), the permittee of a portable or mobile emissions unit may relocate within the State of Ohio without first obtaining a PTI providing the following criteria of OAC rule 3745-31-05(F) are met:
 - a. the permittee of the portable emissions unit possesses an effective Ohio EPA PTI, PTO or registration status;
 - b. the portable emissions unit is equipped with best available technology;
 - c. the portable emission unit owner has identified the proposed site to Ohio EPA;
 - d. Ohio EPA has determined that the portable emissions unit, at the proposed site, will have an acceptable environmental impact;
 - e. a public notice, consistent with OAC Chapter 3745-47, is published in the county where the proposed site is located;
 - f. the owner of the proposed site has provided the portable emissions unit owner with approval or equivalent declaration that it is acceptable to the site owner to move the portable emissions unit to this proposed site; and
 - g. the portable emissions unit owner has provided Ohio EPA with fifteen days written notice of the relocation.
3. Any site approvals issued by Ohio EPA, pursuant to F.2. above, shall be valid for no longer than three years and are subject to renewal.

In order for NEDO and the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site to determine compliance with all of the above criteria, the owner or operator of the portable or mobile emissions unit must file a "Notice of Intent to Relocate", within the specified time frame (30 or 15 days) prior to the relocation of the emissions unit with NEDO and the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new

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site. Upon receipt of the notice, NEDO and/or the appropriate Ohio EPA District Office or local air agency having jurisdiction over the new site, will evaluate the request in accordance with the above criteria.