



State of Ohio Environmental Protection Agency

**RE: PERMIT TO INSTALL MODIFICATION CERTIFIED MAIL
TRUMBULL COUNTY**

Street Address:

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

Mailing Address:

Lazarus Gov.
Center

Application No: 02-12660

DATE: 6/21/00

CSC Ltd
Terry Byrne
4000 Mahoning Ave
Warren, OH 444831968

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

A handwritten signature in cursive script that reads "Thomas G. Rigo".

Thomas G. Rigo
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NEDO



Permit To Install
Terms and Conditions

Issue Date: 6/21/00
Effective Date: 6/21/00

ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 02-12660

Application Number: 02-12660
APS Premise Number: 0278080015
Permit Fee: **\$400**
Name of Facility: CSC Ltd
Person to Contact: Terry Byrne
Address: 4000 Mahoning Ave
Warren, OH 444831968

Location of proposed air contaminant source(s) [emissions unit(s)]:
4000 Mahoning Ave
Warren, Ohio

Description of proposed emissions unit(s):

Modification of PTI 02-2660, issued 01/06/99, requesting revised emission limits for NOx. Four natural gas fired, 600 horsepower, fluid heaters no 1 thru 4, 25.1 mmBtu/hr rated heat input each.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS**A. State and Federally Enforceable Permit To Install General Terms and Conditions****1. Monitoring and Related Recordkeeping 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:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. 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:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.11 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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.
- iv. 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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.

4. 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.

5. Severability Clause

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.

6. 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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, 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, reopening 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.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. 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.
- b. 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:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. 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.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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.

10. Permit To Operate Application

- a. If 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).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 thirty (30) days after commencing operation of the source(s) covered by this permit.

B. State Only Enforceable 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 Related to Monitoring and Recordkeeping 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 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 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 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. 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.

4. 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.

5. 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.

6. 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 Environmental Protection Agency if the proposed sources are inadequate 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 prove to be inadequate or cannot meet applicable standards.

7. 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.

8. 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).

9. 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.

10. 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.

11. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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.

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
PE/PM ₁₀	3.32
NO _x	14.95
CO	36.24
SO ₂	0.28
VOC	2.40

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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)
B003 - 600 HP Fluid Heater No.1 (25.1 mmBtu/hr)	OAC rule 3745-31-05(A)(3) OAC rule 3745-23-06(B)	
(Administrative modification to revise NO _x emission limit)	OAC rule 3745-21-08(B) 40CFR, Part 60 Subpart Dc	OAC rule 3745-18-06(A)

OAC rule 3745-17-07(A)(1)

Applicable Emissions
Limitations/Control
Measures

Use of Natural Gas
and Low NO_x Burners
(see Section A.II.1.)

PE/PM₁₀ - 0.19 lb/hr,
0.83 TPY

SO₂ - 0.02 lb/hr,
0.07 TPY

NO_x - 0.034 lb/mmBtu,
0.85 lb/hr,
3.74 TPY

VOC - 0.14 lb/hr,
0.60 TPY

CO - 2.07 lb/hr,
9.06 TPY

Visible particulate emissions
shall not exceed 5% opacity
as a 6-minute average.

Less stringent than OAC rule
3745-31-05(A)(3)

Less stringent than OAC rule
3745-31-05(A)(3)

Less stringent than OAC rule
3745-31-05(A)(3)

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

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

III. 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 amounts of each fuel combusted during each day. All records required under this section shall be maintained by the permittee for a period of two years following the date of such record.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each period of time during which a fuel other than natural gas is burned in this emissions unit in violation of the operating restriction specified above.
2. The deviation reports shall be submitted in accordance with Section A.1. of Part I of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
PE/PM₁₀ - 0.19 lb/hr, 0.83 TPY

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Fifth edition, Section 1.4, February'98 version for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{PM}_{10}) = 25.1 \text{ mmBtu/hr} \times 7.6 \text{ lbs} / \text{MMCF}(\text{AP-42}) \times 1 \text{ CF}/1020\text{BTU}(\text{nat.gas}) \times 8760 \text{ hr/yr} \times 1 \text{ ton} / 2000 \text{ lbs.}$$

- b. Emission Limitation:
SO₂ - 0.02 lb/hr, 0.07 TPY

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-

42, Fifth edition, Section 1.4, February'98 version for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{SO}_2) = 25.1 \text{ mmBtu/hr} \times 0.60 \text{ lb / MMCF(AP-42)} \times 1 \text{ CF/1020BTU(nat.gas)} \times 8760 \text{ hr/yr} \times 1 \text{ ton / 2000 lbs.}$$

- c. Emission Limitation:
NO_x - 0.034 lb/MMBTU

Applicable Compliance Method

Method 7E of 40 CFR Part 60, Appendix A, shall be used to demonstrate compliance. Alternative USEPA approved test methods may be used with prior approval from the Ohio EPA.

- d. Emission Limitation:
NO_x - 0.85 lb/hr

Applicable Compliance Method:

To determine the actual hourly emission rate for NO_x, results from the required Method 7E compliance emission testing shall be used.

$$E(\text{NO}_x) = 25.1 \text{ mmBtu/hr} \times (\text{actual NO}_x \text{ emission rate - lbs / MMBTU})$$

- e. Emission Limitation:
NO_x - 3.74 TPY

Applicable Compliance Method:

Compliance shall be based on the maximum annual heat input and results from the required Method 7E compliance emission testing.

$$E(\text{NO}_x) = 25.1 \text{ mmBtu/hr} \times 8760 \text{ hrs/yr} \times (\text{actual NO}_x \text{ emission rate - lbs / MMBTU}) \times 1 \text{ ton / 2000 lbs}$$

- f. Emission Limitation:
VOC - 0.14 lb/hr, 0.60 TPY

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Fifth edition, Section 1.4, February'98 version for natural gas combustion and the maximum capacity of the gas burners.

Emissions Unit: B003

$$E(\text{VOC}) = 25.1 \text{ mmBtu/hr} \times 5.5 \text{ lbs / MMCF(AP-42)} \times 1 \text{ CF/1020BTU(nat.gas)} \times 8760 \text{ hr/yr} \times 1 \text{ ton / 2000 lbs}$$

- g. Emission Limitation:
CO - 2.07 lb/hr, 9.06 TPY

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Fifth edition, Section 1.4, February'98 version for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{CO}) = 25.1 \text{ mmBtu/hr} \times 84 \text{ lbs / MMCF(AP-42)} \times 1 \text{ CF/1020BTU(nat.gas)} \times 8760 \text{ hr/yr} \times 1 \text{ ton / 2000 lbs.}$$

- h. Emission Limitation:
Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

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

2. CSC, Ltd. shall conduct, or have conducted, emission testing of one of the four fluid heaters, identified as Fluid Heaters No. 1, 2, 3 and 4, in accordance with the following requirements:
 - a. Emission testing shall be conducted within 3 months after issuance of the permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable emission rate for NO_x.
 - c. The following test method shall be employed to demonstrate compliance with the allowable emission rate for NO_x: Method 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.
3. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date, CSC, Ltd. shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the person(s) who will be conducting the test. Failure to submit such notification for review and approval prior to the test may result in the Ohio EPA District Office's refusal to accept the results of the emission test.

Emissions Unit: B003

Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test, 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.

A comprehensive written report on the results of the emissions test shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test. CSC, Ltd. may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

VI. Miscellaneous Requirements

- 1. The requirements of this permit shall replace the requirements of PTI 02-2660, issued January 6, 1999, entirely.

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
B003	600 HP Fluid Heater No. 1 (25.1 mmBtu/hr)	Dc

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner / operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

Reports are to be sent to:

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

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CSC Ltd

PTI Application: **02-12660**

Issued: 6/21/00

Facility ID: **0278080015**

Emissions Unit: B003

and Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087

B. State Only Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

CSC I

PTI A_j

Issued: 6/21/00

Emissions Unit ID: B004

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>	
B004 - 600 HP Fluid Heater No. 2 (25.1 mmBtu/hr) (Administrative modification to revise NO _x emission limit)	OAC rule 3745-31-05(A)(3) OAC rule 3745-23-06(B) OAC rule 3745-21-08(B) 40CFR, Part 60 Subpart Dc	OAC rule 3745-18-06(A)
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-10(B)(1)	

CSC I

PTI A_j

Issued: 6/21/00

Emissions Unit ID: B004

Applicable Emissions
Limitations/Control
Measures

Use of Natural Gas
and Low NO_x Burners
(see Section A.II.1.)

PE/PM₁₀ - 0.19 lb/hr,
0.83 TPY

SO₂ - 0.02 lb/hr,
0.07 TPY

NO_x - 0.034 lb/MMBTU,
0.85 lb/hr,
3.74 TPY

VOC - 0.14 lb/hr,
0.60 TPY

CO - 2.07 lb/hr,
9.06 TPY

Visible particulate emissions
shall not exceed 5% opacity
as a 6-minute average.

Less stringent than OAC rule
3745-31-05(A)(3)

Less stringent than OAC rule
3745-31-05(A)(3)

Less stringent than OAC rule
3745-31-05(A)(3)

2. Additional Terms and Conditions

2.a None

CSC I

PTI Aj

Issued: 6/21/00

Emissions Unit ID: B004

II. Operational Restrictions

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

III. 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 amounts of each fuel combusted during each day. All records required under this section shall be maintained by the permittee for a period of two years following the date of such record.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each period of time during which a fuel other than natural gas is burned in this emissions unit in violation of the operating restriction specified above.
2. The deviation reports shall be submitted in accordance with Section A.1. of Part I of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
PE/PM₁₀ - 0.19 lb/hr, 0.83 TPY

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Fifth edition, Section 1.4, February'98 version for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{PM}_{10}) = 25.1 \text{ mmBtu/hr} \times 7.6 \text{ lbs} / \text{MMCF}(\text{AP-42}) \times 1 \text{ CF}/1020\text{BTU}(\text{nat.gas}) \times 8760 \text{ hr/yr} \times 1 \text{ ton} / 2000 \text{ lbs.}$$

- b. Emission Limitation:
SO₂ - 0.02 lb/hr, 0.07 TPY

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Fifth edition, Section 1.4, February'98 version for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{SO}_2) = 25.1 \text{ mmBtu/hr} \times 0.60 \text{ lb / MMCF(AP-42)} \times 1 \text{ CF/1020BTU(nat.gas)} \times 8760 \text{ hr/yr} \times 1 \text{ ton / 2000 lbs.}$$

- c. Emission Limitation:
NO_x - 0.034 lb/MMBTU

Applicable Compliance Method

Method 7E of 40 CFR Part 60, Appendix A, shall be used to demonstrate compliance. Alternative USEPA approved test methods may be used with prior approval from the Ohio EPA.

- d. Emission Limitation:
NO_x - 0.85 lb/hr

Applicable Compliance Method:

To determine the actual hourly emission rate for NO_x, results from the required Method 7E compliance emission testing shall be used.

$$E(\text{NO}_x) = 25.1 \text{ mmBtu/hr} \times (\text{actual NO}_x \text{ emission rate} - \text{lbs / MMBTU})$$

- e. Emission Limitation:
NO_x - 3.74 TPY

Applicable Compliance Method:

Compliance shall be based on the maximum annual heat input and results from the required Method 7E compliance emission testing.

$$E(\text{NO}_x) = 25.1 \text{ mmBtu/hr} \times 8760 \text{ hrs/yr} \times (\text{actual NO}_x \text{ emission rate} - \text{lbs / MMBTU}) \times 1 \text{ ton / 2000 lbs}$$

- f. Emission Limitation:
VOC - 0.14 lb/hr, 0.60 TPY

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Fifth edition, Section 1.4, February'98 version for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{VOC}) = 25.1 \text{ mmBtu/hr} \times 5.5 \text{ lbs / MMCF(AP-42)} \times 1 \text{ CF/1020BTU(nat.gas)} \times 8760$$

hr/yr x 1 ton / 2000 lbs

- g. Emission Limitation:
CO - 2.07 lb/hr, 9.06 TPY

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Fifth edition, Section 1.4, February'98 version for natural gas combustion and the maximum capacity of the gas burners.

$E(\text{CO}) = 25.1 \text{ mmBtu/hr} \times 84 \text{ lbs} / \text{MMCF}(\text{AP-42}) \times 1 \text{ CF}/1020\text{BTU}(\text{nat.gas}) \times 8760 \text{ hr/yr} \times 1 \text{ ton} / 2000 \text{ lbs.}$

- h. Emission Limitation:
Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

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

2. CSC, Ltd. shall conduct, or have conducted, emission testing of one of the four fluid heaters, identified as Fluid Heaters No. 1, 2, 3 and 4, in accordance with the following requirements:
- a. Emission testing shall be conducted within 3 months after issuance of the permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable emission rate for NO_x.
 - c. The following test method shall be employed to demonstrate compliance with the allowable emission rate for NO_x: Method 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.
3. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date, CSC, Ltd. shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the person(s) who will be conducting the test. Failure

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Issued: 6/21/00

Emissions Unit ID: B004

to submit such notification for review and approval prior to the test may result in the Ohio EPA District Office's refusal to accept the results of the emission test.

Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test, 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.

A comprehensive written report on the results of the emissions test shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test. CSC, Ltd. may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

VI. Miscellaneous Requirements

1. The requirements of this permit shall replace the requirements of PTI 02-2660, issued January 6, 1999, entirely.
2. The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
B004	600 HP Fluid Heater No. 2 (25.1 mmBtu/hr)	Dc

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner / operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

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Issued: 6/21/00

Emissions Unit ID: B004

B. State Only Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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PTI A_j

Issued: 6/21/00

Emissions Unit ID: B005

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>	
B005 - 600 HP Fluid Heater No. 3 (25.1 mmBtu/hr) (Administrative modification to revise NO _x emission limit)	OAC rule 3745-31-05(A)(3) OAC rule 3745-23-06(B) OAC rule 3745-21-08(B) 40CFR, Part 60 Subpart Dc	OAC rule 3745-18-06(A)
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-10(B)(1)	

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Issued: 6/21/00

Emissions Unit ID: B005

Applicable Emissions
Limitations/Control
Measures

Use of Natural Gas
and Low NO_x Burners
(see Section A.II.1.)

PE/PM₁₀ - 0.19 lb/hr,
0.83 TPY

SO₂ - 0.02 lb/hr,
0.07 TPY

NO_x - 0.034 lb/MMBTU,
0.85 lb/hr,
3.74 TPY

VOC - 0.14 lb/hr,
0.60 TPY

CO - 2.07 lb/hr,
9.06 TPY

Visible particulate emissions
shall not exceed 5% opacity
as a 6-minute average.

Less stringent than OAC rule
3745-31-05(A)(3)

Less stringent than OAC rule
3745-31-05(A)(3)

Less stringent than OAC rule
3745-31-05(A)(3)

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

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

III. 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 amounts of each fuel combusted during each day. All records required under this section shall be maintained by the permittee for a period of two years following the date of such record.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each period of time during which a fuel other than natural gas is burned in this emissions unit in violation of the operating restriction specified above.
2. The deviation reports shall be submitted in accordance with Section A.1. of Part I of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
PE/PM₁₀ - 0.19 lb/hr, 0.83 TPY

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Fifth edition, Section 1.4, February'98 version for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{PM}_{10}) = 25.1 \text{ mmBtu/hr} \times 7.6 \text{ lbs} / \text{MMCF}(\text{AP-42}) \times 1 \text{ CF}/1020\text{BTU}(\text{nat.gas}) \times 8760 \text{ hr/yr} \times 1 \text{ ton} / 2000 \text{ lbs.}$$

- b. Emission Limitation:
SO₂ - 0.02 lb/hr, 0.07 TPY

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Fifth edition, Section 1.4, February'98 version for natural gas combustion and the

maximum capacity of the gas burners.

$$E(\text{SO}_2) = 25.1 \text{ mmBtu/hr} \times 0.60 \text{ lb / MMCF(AP-42)} \times 1 \text{ CF/1020BTU(nat.gas)} \times 8760 \text{ hr/yr} \times 1 \text{ ton / 2000 lbs.}$$

- c. Emission Limitation:
NO_x - 0.034 lb/MMBtu

Applicable Compliance Method

Method 7E of 40 CFR Part 60, Appendix A, shall be used to demonstrate compliance. Alternative USEPA approved test methods may be used with prior approval from the Ohio EPA.

- d. Emission Limitation:
NO_x - 0.85 lb/hr

Applicable Compliance Method:

To determine the actual hourly emission rate for NO_x, results from the required Method 7E compliance emission testing shall be used.

$$E(\text{NO}_x) = 25.1 \text{ mmBtu/hr} \times (\text{actual NO}_x \text{ emission rate} - \text{lbs / MMBtu})$$

- e. Emission Limitation:
NO_x - 3.74 tpy

Applicable Compliance Method:

Compliance shall be based on the maximum annual heat input and results from the required Method 7E compliance emission testing.

$$E(\text{NO}_x) = 25.1 \text{ mmBtu/hr} \times 8760 \text{ hrs/yr} \times (\text{actual NO}_x \text{ emission rate} - \text{lbs / MMBtu}) \times 1 \text{ ton / 2000 lbs}$$

- f. Emission Limitation:
VOC - 0.14 lb/hr, 0.60 tpy

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Fifth edition, Section 1.4, February'98 version for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{VOC}) = 25.1 \text{ mmBtu/hr} \times 5.5 \text{ lbs / MMCF(AP-42)} \times 1 \text{ CF/1020BTU(nat.gas)} \times 8760$$

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hr/yr x 1 ton / 2000 lbs

- g. Emission Limitation:
CO - 2.07 lb/hr, 9.06 tpy

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Fifth edition, Section 1.4, February'98 version for natural gas combustion and the maximum capacity of the gas burners.

$E(\text{CO}) = 25.1 \text{ mmBtu/hr} \times 84 \text{ lbs} / \text{MMCF}(\text{AP-42}) \times 1 \text{ CF}/1020\text{BTU}(\text{nat.gas}) \times 8760 \text{ hr/yr} \times 1 \text{ ton} / 2000 \text{ lbs.}$

- h. Emission Limitation:
Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

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

2. CSC, Ltd. shall conduct, or have conducted, emission testing of one of the four fluid heaters, identified as Fluid Heaters No. 1, 2, 3 and 4, in accordance with the following requirements:
- a. Emission testing shall be conducted within 3 months after issuance of the permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable emission rate for NO_x.
 - c. The following test method shall be employed to demonstrate compliance with the allowable emission rate for NO_x: Method 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.
3. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date, CSC, Ltd. shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the person(s) who will be conducting the test. Failure

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Issued: 6/21/00

Emissions Unit ID: B005

P.O. Box 163669
Columbus, Ohio 43216-3669

and Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087

B. State Only Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

- 2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

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Issued: 6/21/00

Emissions Unit ID: B006

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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>	
B006 - 600 HP Fluid Heater No. 4 (25.1 mmBtu/hr) (Administrative modification to revise NO _x emission limit)	OAC rule 3745-31-05(A)(3) OAC rule 3745-23-06(B) OAC rule 3745-21-08(B) 40CFR, Part 60 Subpart Dc	OAC rule 3745-18-06(A)
	OAC rule 3745-17-07(A)(1)	
	OAC rule 3745-17-10(B)(1)	

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Issued: 6/21/00

Emissions Unit ID: B006

Applicable Emissions
Limitations/Control
Measures

Use of Natural Gas
and Low NO_x Burners
(see Section A.II.1.)

PE/PM₁₀ - 0.19 lb/hr,
0.83 TPY

SO₂ - 0.02 lb/hr,
0.07 TPY

NO_x - 0.034 lb/MMBTU,
0.85 lb/hr,
3.74 TPY

VOC - 0.14 lb/hr,
0.60 TPY

CO - 2.07 lb/hr,
9.06 TPY

Visible particulate emissions
shall not exceed 5% opacity
as a 6-minute average.

Less stringent than OAC rule
3745-31-05(A)(3)

Less stringent than OAC rule
3745-31-05(A)(3)

Less stringent than OAC rule
3745-31-05(A)(3)

2. Additional Terms and Conditions

2.a None

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Issued: 6/21/00

Emissions Unit ID: B006

II. Operational Restrictions

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

III. 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 amounts of each fuel combusted during each day. All records required under this section shall be maintained by the permittee for a period of two years following the date of such record.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each period of time during which a fuel other than natural gas is burned in this emissions unit in violation of the operating restriction specified above.
2. The deviation reports shall be submitted in accordance with Section A.1. of Part I of the General Terms and Conditions of this permit.

V. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.I of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation:
PE/PM₁₀ - 0.19 lb/hr, 0.83 TPY

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Fifth edition, Section 1.4, February'98 version for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{PM}_{10}) = 25.1 \text{ mmBtu/hr} \times 7.6 \text{ lbs} / \text{MMCF}(\text{AP-42}) \times 1 \text{ CF}/1020\text{BTU}(\text{nat.gas}) \times 8760 \text{ hr/yr} \times 1 \text{ ton} / 2000 \text{ lbs.}$$

- b. Emission Limitation:
SO₂ - 0.02 lb/hr, 0.07 TPY

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Fifth edition, Section 1.4, February'98 version for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{SO}_2) = 25.1 \text{ mmBtu/hr} \times 0.60 \text{ lb / MMCF(AP-42)} \times 1 \text{ CF/1020BTU(nat.gas)} \times 8760 \text{ hr/yr} \times 1 \text{ ton / 2000 lbs.}$$

- c. Emission Limitation:
NO_x - 0.034 lb/MMBTU

Applicable Compliance Method

Method 7E of 40 CFR Part 60, Appendix A, shall be used to demonstrate compliance. Alternative USEPA approved test methods may be used with prior approval from the Ohio EPA.

- d. Emission Limitation:
NO_x - 0.85 lb/hr

Applicable Compliance Method:

To determine the actual hourly emission rate for NO_x, results from the required Method 7E compliance emission testing shall be used.

$$E(\text{NO}_x) = 25.1 \text{ mmBtu/hr} \times (\text{actual NO}_x \text{ emission rate} - \text{lbs / MMBTU})$$

- e. Emission Limitation:
NO_x - 3.74 TPY

Applicable Compliance Method:

Compliance shall be based on the maximum annual heat input and results from the required Method 7E compliance emission testing.

$$E(\text{NO}_x) = 25.1 \text{ mmBtu/hr} \times 8760 \text{ hrs/yr} \times (\text{actual NO}_x \text{ emission rate} - \text{lbs / MMBTU}) \times 1 \text{ ton / 2000 lbs}$$

- f. Emission Limitation:
VOC - 0.14 lb/hr, 0.60 TPY

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42,

Emissions Unit ID: B006

Fifth edition, Section 1.4, February'98 version for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{VOC}) = 25.1 \text{ mmBtu/hr} \times 5.5 \text{ lbs} / \text{MMCF}(\text{AP-42}) \times 1 \text{ CF}/1020\text{BTU}(\text{nat.gas}) \times 8760 \text{ hr/yr} \times 1 \text{ ton} / 2000 \text{ lbs}$$

- g. Emission Limitation:
CO - 2.07 lb/hr, 9.06 TPY

Applicable Compliance Method:

Compliance shall be based on a one time calculation by using emission factors from AP-42, Fifth edition, Section 1.4, February'98 version for natural gas combustion and the maximum capacity of the gas burners.

$$E(\text{CO}) = 25.1 \text{ mmBtu/hr} \times 84 \text{ lbs} / \text{MMCF}(\text{AP-42}) \times 1 \text{ CF}/1020\text{BTU}(\text{nat.gas}) \times 8760 \text{ hr/yr} \times 1 \text{ ton} / 2000 \text{ lbs.}$$

- h. Emission Limitation:
Visible particulate emissions shall not exceed 5% opacity as a 6-minute average.

Applicable Compliance Method:

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

2. CSC, Ltd. shall conduct, or have conducted, emission testing of one of the four fluid heaters, identified as Fluid Heaters No. 1, 2, 3 and 4, in accordance with the following requirements:
 - a. Emission testing shall be conducted within 3 months after issuance of the permit.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable emission rate for NO_x.
 - c. The following test method shall be employed to demonstrate compliance with the allowable emission rate for NO_x: Method 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.
3. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northeast District Office.

Not later than 30 days prior to the proposed test date, CSC, Ltd. shall submit an "Intent to Test" notification to the Ohio EPA Northeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time and date of the test, and the person(s) who will be conducting the test. Failure

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to submit such notification for review and approval prior to the test may result in the Ohio EPA District Office's refusal to accept the results of the emission test.

Personnel from the Ohio EPA Northeast District Office shall be permitted to witness the test, 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.

A comprehensive written report on the results of the emissions test shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office within 30 days following completion of the test. CSC, Ltd. may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northeast District Office.

VI. Miscellaneous Requirements

1. The requirements of this permit shall replace the requirements of PTI 02-2660, issued January 6, 1999, entirely.
2. The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
B006	600 HP Fluid Heater No. 4 (25.1 mmBtu/hr)	Dc

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner / operator is hereby advised of the requirement to report the following at the appropriate times:

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (If required, at least 30 days prior to testing).

CSC Ltd

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Issued

Facility ID: 0278080015

Emissions Unit ID: B006

Reports are to be sent to:

Ohio Environmental Protection Agency

DAPC - Permit Management Unit

P.O. Box 163669

Columbus, Ohio 43216-3669

and Northeast District Office

2110 E. Aurora Road

Twinsburg, Ohio 44087

B. State Only Enforceable Section

I. 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>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

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None

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