



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.  
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION  
DEFIANCE COUNTY  
Application No: 03-13598  
Fac ID: 0320010044**

**CERTIFIED MAIL**

**DATE: 9/20/2005**

Defiance Energy  
Gary Hughes  
26427 State Route 281 East  
Defiance, OH 43512

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of \$ 0 will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

*Michael W. Ahern*

Michael W. Ahern, Manager  
Permit Issuance and Data Management Section  
Division of Air Pollution Control

CC: USEPA

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**DEFIANCE COUNTY**

**PUBLIC NOTICE**

**ISSUANCE OF DRAFT PERMIT TO INSTALL 03-13598 FOR AN AIR CONTAMINANT SOURCE FOR  
Defiance Energy**

On 9/20/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Defiance Energy**, located at **26427 State Route 281 East, c/o GMC, Defiance**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-13598:

**Modification of PTI 03-13598 issued August 7, 2001 to adjust synthetic NOx group limit.**

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

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



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT MODIFICATION OF PERMIT TO INSTALL 03-13598**

Application Number: 03-13598  
Facility ID: 0320010044  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Defiance Energy  
Person to Contact: Gary Hughes  
Address: 26427 State Route 281 East  
Defiance, OH 43512

Location of proposed air contaminant source(s) [emissions unit(s)]:  
**26427 State Route 281 East, c/o GMC  
Defiance, Ohio**

Description of proposed emissions unit(s):  
**Modification of PTI 03-13598 issued August 7, 2001 to adjust synthetic NOx group limit.**

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

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Director

Defiance Energy

Facility ID: 0320010044

PTI Application: 03-13598

Issued: To be entered upon final issuance

## 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

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reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.8 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 (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - iv. If this permit is for an emissions unit located at a Title V facility, then each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d. The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **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

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permittee shall comply with the requirement to register such a plan.

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**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 re-issuance, or modification
- b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.
- c. This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d. This permit does not convey any property rights of any sort, or any exclusive privilege.
- e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to

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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.

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## **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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

## **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 its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. 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 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 ninety (90) days after commencing operation of the source(s) covered by this permit.

## 11. 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.

## 12. Air Pollution Nuisance

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**PTI Application: 03-13598**

**Issued: To be entered upon final issuance**

**Facility ID: 0320010044**

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.

**Defiance Energy**

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### **13. Permit-To-Install**

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

## **B. State Only Enforceable Permit-To-Install General Terms and Conditions**

### **1. Compliance Requirements**

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

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

### **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.

**Defiance Energy****Facility ID: 0320010044****PTI Application: 03-13598****Issued: To be entered upon final issuance****4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or 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.

**5. Construction of New Sources(s)**

This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

**6. 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.

**7. 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).

**Defiance Energy**

**Facility ID: 0320010044**

**PTI Application: 03-13598**

**Issued: To be entered upon final issuance**

**8. Construction Compliance Certification**

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install.

Defia

PTI A

Emissions Unit ID: B001

**Issued: To be entered upon final issuance**

The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

**9. 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., postmarked), 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.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
NOx	6.96
CO	24.3
PE	5.70

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**Defiance Energy**

**PTI Application: 03-13598**

**Issued: To be entered upon final issuance**

**Facility ID: 0320010044**

**Defia**

**PTI A**

Emissions Unit ID: B001

**Issued: To be entered upon final issuance**

**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.

Defia

PTI A

Emissions Unit ID: B001

Issued: To be entered upon final issuance

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>	40 CFR Part 60, Subpart Dc
B001 - 22 mmBtu/hr natural gas fired boiler - CUC boiler # 1	40 CFR Part 52.21 OAC rule 3745-31-(10-20)  OAC rule 3745-31-05(C)	
(Modification of the August 7, 2001 issuance, to change the NOx combined limit, and remove two small combustion sources from the permit)	OAC rule 3745-31-05(A)	
	OAC rule 3745-17-10(B)	
	OAC rule 3745-17-07(A)	

**Defia**

**PTI A**

Emissions Unit ID: B001

**Issued: To be entered upon final issuance**

Applicable Emissions Limitations/Control Measures	actual heat input
control requirements (see A.2.a)	visible PE's shall not exceed 20% opacity as a six-minute average, except as provided by rule
6.96 tons nitrogen oxide (NO <sub>x</sub> ) per rolling 12-month period, for emissions units B001, B002, and B003 combined, based upon natural gas usage restrictions (see A.2.b)	Recordkeeping (see A.2.c)
The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21/ OAC rule 3745-31-(10-20), OAC rule 3745-17-10(B), OAC rule 3745-17-07(A) and 40 CFR Part 60, Subpart Dc. (See II.1)	
1.1 lb NO <sub>x</sub> /hr, 4.82 tons NO <sub>x</sub> /yr	
1.85 lbs carbon monoxide (CO)/hr, 8.1 tons CO/yr	
0.44 lb particulate emissions (PE)/hr, 1.9 tons PE/yr	
0.020 lb PE/mmBtu of	

Defia

PTI A

Emissions Unit ID: B001

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** The permittee shall employ best available control technology (BACT) on this emissions unit. BACT has been determined to be the use of a control system meeting the following requirements for control of NO<sub>x</sub> emissions:
- i. boiler equipped with low NO<sub>x</sub> burners with flue gas recirculation and designed to emit NO<sub>x</sub> at a rate of 50 lbs/mmCf of natural gas burned.
- 2.b** In order to comply with Prevention of Significant Deterioration (PSD) Significant Impact Increment for NO<sub>x</sub>, the permittee has requested federally enforceable restrictions to limit the potential to emit from the emissions units contained in this permit to install by limiting natural gas usage. Combined annual NO<sub>x</sub> emissions from emissions units B001, B002 and B003, shall not exceed 6.96 tons/yr based upon a rolling, 12-month restriction of natural gas usage (see A.II.2).
- 2.c** The permittee shall record and maintain records of the amounts of each fuel combusted during each day.
- 2.d** All PE is assumed to be in the form of PM<sub>10</sub>.

**II. Operational Restrictions**

1. The permittee shall burn only natural gas in this emissions unit.
2. The maximum annual natural gas usage for emissions unit B001, B002 and B003 shall not exceed 278.4 mmCf/yr, combined, based upon a rolling 12-month summation of natural gas usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the natural gas usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Cumulative natural gas usage (mmCf)</u>
1	25.93
1-2	51.85
1-3	77.78
1-4	103.71
1-5	129.64
1-6	155.57

**Defiance Energy**  
**PTI A**  
**Issue**

**Facility ID: 0320010044**

Emissions Unit ID: B001

1-7	181.50
1-8	207.43
1-9	233.36
1-10	259.29
1-11	278.4
1-12	278.4

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage shall be based upon a rolling 12-month summation of the natural gas usage.

### 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 maintain monthly records of the following information for emissions unit B001, B002, and B003 :
  - a. the quantity of natural gas combusted, in mmCf;
  - b. for the first 12 months of operation under the provisions of this permit, the cumulative monthly natural gas usage, in mmCf; and
  - c. after the first 12 months of operation under the provisions of this permit, the annual natural gas usage, in mmCf, based on a rolling, 12-month summation of the monthly natural gas usage.
3. In addition to the above information, the permittee shall also record the following information each month for emissions units B001, B002, and B003 :
  - a. the calculated NO<sub>x</sub> emission rate, in tons per month;
  - b. for the first 12 months of operation under the provisions of this permit, the cumulative monthly NO<sub>x</sub> emission rate, in tons; and
  - c. after the first 12 months of operation under the provisions of this permit, the annual NO<sub>x</sub> emission rate, in tons, based on a rolling, 12-month summation of the monthly NO<sub>x</sub> emissions.
4. 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.

**Defia****PTI A**

Emissions Unit ID: B001

**Issued: To be entered upon final issuance****IV. Reporting Requirements**

1. The permittee shall submit deviation(excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
  - a. for the first 12 calendar months of operation, all exceedance of the allowable cumulative natural gas usage; and
  - b. the annual natural gas usage restrictions and emission limitation per rolling 12-month period.

**V. Testing Requirements**

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. The emissions testing shall be conducted within 6 months after start-up of this emissions unit.
  - b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for NO<sub>x</sub> and CO.
  - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: NO<sub>x</sub>, Method 7 of 40 CFR Part 60, Appendix A. CO, Method 10 of 40 CFR Part 60, Appendix A.
  - d. The test shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director or appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit and "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the

Emissions Unit ID: B001

Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee shall include in the report the operating parameters as required in (V)(1)(c) above.

2. Compliance Methods Requirements: Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation: 6.96 tons NO<sub>x</sub> per rolling 12-month period

Applicable Compliance Method: Compliance with the rolling 12-month emission limitation shall be demonstrated by the recordkeeping requirements specified in section A.III.3.

- b. Emission Limitation: 1.1 lbs NO<sub>x</sub>/hr, 4.82 tons NO<sub>x</sub>/yr

Applicable Compliance Method: Compliance with the lb/hr limitation shall be determined through the testing required in sections A.V.1 and A.V.2 of the terms and conditions of this permit. Ongoing compliance with the lb/hr limitation shall be demonstrated through emission testing in accordance with Ohio EPA, Office of Air Pollution Control, Division of Engineering, Engineering Guide #16.

The tons/yr emission limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- c. Emission Limitation: 1.85 lbs CO/hr, 8.1 tons CO/yr

Applicable Compliance Method: Compliance with the lb/hr limitation shall be determined through the testing required in sections A.V.1 and A.V.2 of the terms and conditions of this permit. Ongoing compliance with the lb/hr limitation shall be demonstrated through emission testing in accordance with Ohio EPA, Office of Air Pollution Control, Division of Engineering, Engineering Guide #16.

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Emissions Unit ID: B001

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The tons/yr emission limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

**Defial****PTI A**

Emissions Unit ID: B001

**Issued: To be entered upon final issuance**

- d. Emission Limitation: 0.44 lb PE/hr, 1.9 tons PE/yr

Applicable Compliance Method: The lb PE/hr was determined by multiplying the maximum heat input capacity of the boiler (22 mmBtu/hr) by the allowable emission rate of 0.020 lb PE/mmBtu of actual heat input. Therefore, provided compliance is shown with OAC 3745-17-10(B), compliance will also be shown with the lb/hr allowable.

The tons/yr emission limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- e. Emission Limitation: 0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method: The permittee shall demonstrate compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (48,000 cu. ft./hr) by the appropriate emission factor from AP-42, Table 1.4-2 (revised 7/98) [1.9 lbs PE (filtrable)/mmCf. ft.] and dividing by the maximum heat input capacity of the boiler (22 mmBtu/hr). If required, compliance shall be determined in accordance with OAC rule 3745-17-03(B)(9).

- f. Emission Limitation: 20% opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method: OAC rule 3745-17-03(B)(1)

## **VI. Miscellaneous Requirements**

None

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

### A. Applicable Emissions Limitations and/or Control Requirements

- 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>
B002 - 22 mmBtu natural gas fired boiler - CUC boiler #2  (Modification of the August 7, 2001 issuance, to change the NOx combined limit, and remove two small combustion sources from the permit)	40 CFR Part 52.21 OAC rule 3745-31-(10-20)  OAC rule 3745-31-05(C)  OAC rule 3745-31-05(A)	control requirements (see A.2.a)  6.96 tons nitrogen oxide (NO <sub>x</sub> ) per rolling 12-month period, for emissions units B001, B002, and B003 combined, based upon natural gas usage restrictions (see A.2.b)  The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21/ OAC rule 3745-31-(10-20), OAC rule 3745-17-10(B), OAC rule 3745-17-07(A) and 40 CFR Part 60, Subpart Dc. (See II.1)  1.1 lb NO <sub>x</sub> /hr, 4.82 tons NO <sub>x</sub> /yr  1.85 lbs carbon monoxide (CO)/hr, 8.1 tons CO/yr
	OAC rule 3745-17-10(B)	0.44 lb particulate emissions (PE)/hr, 1.9 tons PE/yr
	OAC rule 3745-17-07(A)	0.020 lb PE/mmBtu of actual heat input
	40 CFR Part 60, Subpart Dc	visible PE's shall not exceed 20% opacity as a six-minute average, except as provided by rule

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Emissions Unit ID: B002

Issued: To be entered upon final issuance

Recordkeeping (see A.2.c)

**2. Additional Terms and Conditions**

- 2.a** The permittee shall employ best available control technology (BACT) on this emissions unit. BACT has been determined to be the use of a control system meeting the following requirements for control of NO<sub>x</sub> emissions:
  - i. boiler equipped with low NO<sub>x</sub> burners with flue gas recirculation and designed to emit NO<sub>x</sub> at a rate of 50 lbs/mmCf of natural gas burned.
- 2.b** In order to comply with Prevention of Significant Deterioration (PSD) Significant Impact Increment for NO<sub>x</sub>, the permittee has requested federally enforceable restrictions to limit the potential to emit from the emissions units contained in this permit to install by limiting natural gas usage. Combined annual NO<sub>x</sub> emissions from emissions units B001, B002 and B003, shall not exceed 6.96 tons/yr based upon a rolling, 12-month restriction of natural gas usage (see A.II.2).
- 2.c** The permittee shall record and maintain records of the amounts of each fuel combusted during each day.
- 2.d** All PE is assumed to be in the form of PM<sub>10</sub>.

**II. Operational Restrictions**

- 1. The permittee shall burn only natural gas in this emissions unit.
- 2. The maximum annual natural gas usage for emissions unit B001, B002 and B003 shall not exceed 278.4 mmCf/yr, combined, based upon a rolling 12-month summation of natural gas usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the natural gas usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Cumulative natural gas usage (mmCf)</u>
1	25.93
1-2	51.85

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1-3	77.78	
1-4	103.71	
1-5	129.64	
1-6	155.57	
1-7	181.50	
1-8	207.43	
1-9	233.36	
1-10	259.29	
1-11		278.4
1-12		278.4

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage shall be based upon a rolling 12-month summation of the natural gas usage.

### 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 maintain monthly records of the following information for emissions unit B001, B002, and B003 :
  - a. the quantity of natural gas combusted, in mmCf;
  - b. for the first 12 months of operation under the provisions of this permit, the cumulative monthly natural gas usage, in mmCf; and
  - c. after the first 12 months of operation under the provisions of this permit, the annual natural gas usage, in mmCf, based on a rolling, 12-month summation of the monthly natural gas usage.
3. In addition to the above information, the permittee shall also record the following information each month for emissions units B001, B002, and B003 :
  - a. the calculated NO<sub>x</sub> emission rate, in tons per month;
  - b. for the first 12 months of operation under the provisions of this permit, the cumulative monthly NO<sub>x</sub> emission rate, in tons; and
  - c. after the first 12 months of operation under the provisions of this permit, the annual NO<sub>x</sub> emission rate, in tons, based on a rolling, 12-month summation of the monthly NO<sub>x</sub> emissions.

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4. 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.

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Emissions Unit ID: B002

**Issued: To be entered upon final issuance****IV. Reporting Requirements**

1. The permittee shall submit deviation(excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
  - a. for the first 12 calendar months of operation, all exceedance of the allowable cumulative natural gas usage; and
  - b. the annual natural gas usage restrictions and emission limitation per rolling 12-month period.

**V. Testing Requirements**

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. The emissions testing shall be conducted within 6 months after start-up of this emissions unit.
  - b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for NO<sub>x</sub> and CO.
  - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: NO<sub>x</sub>, Method 7 of 40 CFR Part 60, Appendix A. CO, Method 10 of 40 CFR Part 60, Appendix A.
  - d. The test shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director or appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit and "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the

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Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee shall include in the report the operating parameters as required in (V)(1)(c) above.

2. Compliance Methods Requirements: Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation: 6.96 tons NO<sub>x</sub> per rolling 12-month period

Applicable Compliance Method: Compliance with the rolling 12-month emission limitation shall be demonstrated by the recordkeeping requirements specified in section A.III.3.

- b. Emission Limitation: 1.1 lbs NO<sub>x</sub>/hr, 4.82 tons NO<sub>x</sub>/yr

Applicable Compliance Method: Compliance with the lb/hr limitation shall be determined through the testing required in sections A.V.1 and A.V.2 of the terms and conditions of this permit. Ongoing compliance with the lb/hr limitation shall be demonstrated through emission testing in accordance with Ohio EPA, Office of Air Pollution Control, Division of Engineering, Engineering Guide #16.

The tons/yr emission limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- c. Emission Limitation: 1.85 lbs CO/hr, 8.1 tons CO/yr

Applicable Compliance Method: Compliance with the lb/hr limitation shall be

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determined through the testing required in sections A.V.1 and A.V.2 of the terms and conditions of this permit. Ongoing compliance with the lb/hr limitation shall be demonstrated through emission testing in accordance with Ohio EPA, Office of Air Pollution Control, Division of Engineering, Engineering Guide #16.

The tons/yr emission limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

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- d. Emission Limitation: 0.44 lb PE/hr, 1.9 tons PE/yr

Applicable Compliance Method: The lb PE/hr was determined by multiplying the maximum heat input capacity of the boiler (22 mmBtu/hr) by the allowable emission rate of 0.020 lb PE/mmBtu of actual heat input. Therefore, provided compliance is shown with OAC 3745-17-10(B), compliance will also be shown with the lb/hr allowable.

The tons/yr emission limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- e. Emission Limitation: 0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method: The permittee shall demonstrate compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (48,000 cu. ft./hr) by the appropriate emission factor from AP-42, Table 1.4-2 (revised 7/98) [1.9 lbs PE (filtrable)/mmCf. ft.] and dividing by the maximum heat input capacity of the boiler (22 mmBtu/hr). If required, compliance shall be determined in accordance with OAC rule 3745-17-03(B)(9).

- f. Emission Limitation: 20% opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method: OAC rule 3745-17-03(B)(1)

## **VI. Miscellaneous Requirements**

None

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Emissions Unit ID: B003

Issued: To be entered upon final issuance

**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>	40 CFR Part 60, Subpart Dc
B003 - 22 mmBtu/hr natural gas fired boiler - CUC boiler # 3	40 CFR Part 52.21 OAC rule 3745-31-(10-20)  OAC rule 3745-31-05(C)	
(Modification of the August 7, 2001 issuance, to change the NOx combined limit, and remove two small combustion sources from the permit)	OAC rule 3745-31-05(A)	
	OAC rule 3745-17-10(B)	
	OAC rule 3745-17-07(A)	

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Emissions Unit ID: B003

Applicable Emissions  
Limitations/Control  
Measures

six-minute average, except as provided by rule

Recordkeeping (see A.2.c)

control requirements (see A.2.a)

6.96 tons nitrogen oxide (NO<sub>x</sub>) per rolling 12-month period, for emissions units B001, B002, and B003 combined, based upon natural gas usage restrictions (see A.2.b)

The requirements of this rule also include compliance with the requirements of 40 CFR Part 52.21/ OAC rule 3745-31-(10-20), OAC rule 3745-17-10(B), OAC rule 3745-17-07(A) and 40 CFR Part 60, Subpart Dc.  
(See II.1)

1.1 lb NO<sub>x</sub>/hr, 4.82 tons NO<sub>x</sub>/yr

1.85 lbs carbon monoxide (CO)/hr,  
8.1 tons CO/yr

0.44 lb particulate emissions (PE)/hr, 1.9 tons PE/yr

0.020 lb PE/mmBtu of actual heat input

visible PE's shall not exceed 20% opacity as a

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**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** The permittee shall employ best available control technology (BACT) on this emissions unit. BACT has been determined to be the use of a control system meeting the following requirements for control of NO<sub>x</sub> emissions:
- i. boiler equipped with low NO<sub>x</sub> burners with flue gas recirculation and designed to emit NO<sub>x</sub> at a rate of 50 lbs/mmCf of natural gas burned.
- 2.b** In order to comply with Prevention of Significant Deterioration (PSD) Significant Impact Increment for NO<sub>x</sub>, the permittee has requested federally enforceable restrictions to limit the potential to emit from the emissions units contained in this permit to install by limiting natural gas usage. Combined annual NO<sub>x</sub> emissions from emissions units B001, B002 and B003, shall not exceed 6.96 tons/yr based upon a rolling, 12-month restriction of natural gas usage (see A.II.2).
- 2.c** The permittee shall record and maintain records of the amounts of each fuel combusted during each day.
- 2.d** All PE is assumed to be in the form of PM<sub>10</sub>.

**II. Operational Restrictions**

1. The permittee shall burn only natural gas in this emissions unit.
2. The maximum annual natural gas usage for emissions unit B001, B002 and B003 shall not exceed 278.4 mmCf/yr, combined, based upon a rolling 12-month summation of natural gas usage.

To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the natural gas usage levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Cumulative natural gas usage (mmCf)</u>
1	25.93
1-2	51.85
1-3	77.78
1-4	103.71
1-5	129.64
1-6	155.57

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1-7	181.50
1-8	207.43
1-9	233.36
1-10	259.29
1-11	278.4
1-12	278.4

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual natural gas usage shall be based upon a rolling 12-month summation of the natural gas usage.

**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 maintain monthly records of the following information for emissions unit B001, B002, and B003 :
  - a. the quantity of natural gas combusted, in mmCf;
  - b. for the first 12 months of operation under the provisions of this permit, the cumulative monthly natural gas usage, in mmCf; and
  - c. after the first 12 months of operation under the provisions of this permit, the annual natural gas usage, in mmCf, based on a rolling, 12-month summation of the monthly natural gas usage.
3. In addition to the above information, the permittee shall also record the following information each month for emissions units B001, B002, and B003 :
  - a. the calculated NO<sub>x</sub> emission rate, in tons per month;
  - b. for the first 12 months of operation under the provisions of this permit, the cumulative monthly NO<sub>x</sub> emission rate, in tons; and
  - c. after the first 12 months of operation under the provisions of this permit, the annual NO<sub>x</sub> emission rate, in tons, based on a rolling, 12-month summation of the monthly NO<sub>x</sub> emissions.

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4. 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.

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**Issued: To be entered upon final issuance****IV. Reporting Requirements**

1. The permittee shall submit deviation(excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports which identify exceedances of any of the following:
  - a. for the first 12 calendar months of operation, all exceedance of the allowable cumulative natural gas usage; and
  - b. the annual natural gas usage restrictions and emission limitation per rolling 12-month period.

**V. Testing Requirements**

1. The permittee shall conduct, or have conducted, emissions testing in accordance with the following requirements:
  - a. The emissions testing shall be conducted within 6 months after start-up of this emissions unit.
  - b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate for NO<sub>x</sub> and CO.
  - c. The following test method shall be employed to demonstrate compliance with the allowable mass emission rate: NO<sub>x</sub>, Method 7 of 40 CFR Part 60, Appendix A. CO, Method 10 of 40 CFR Part 60, Appendix A.
  - d. The test shall be conducted while the emissions unit is operating at its maximum capacity, unless otherwise specified or approved by the Director or appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit and "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the

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Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee shall include in the report the operating parameters as required in (V)(1)(c) above.

2. Compliance Methods Requirements: Compliance with the emission limitations in section A.I of the terms and conditions of this permit shall be determined in accordance with the following methods:

- a. Emission Limitation: 6.96 tons NO<sub>x</sub> per rolling 12-month period

Applicable Compliance Method: Compliance with the rolling 12-month emission limitation shall be demonstrated by the recordkeeping requirements specified in section A.III.3.

- b. Emission Limitation: 1.1 lbs NO<sub>x</sub>/hr, 4.82 tons NO<sub>x</sub>/yr

Applicable Compliance Method: Compliance with the lb/hr limitation shall be determined through the testing required in sections A.V.1 and A.V.2 of the terms and conditions of this permit. Ongoing compliance with the lb/hr limitation shall be demonstrated through emission testing in accordance with Ohio EPA, Office of Air Pollution Control, Division of Engineering, Engineering Guide #16.

The tons/yr emission limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- c. Emission Limitation: 1.85 lbs CO/hr, 8.1 tons CO/yr

Applicable Compliance Method: Compliance with the lb/hr limitation shall be

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Emissions Unit ID: B003

determined through the testing required in sections A.V.1 and A.V.2 of the terms and conditions of this permit. Ongoing compliance with the lb/hr limitation shall be demonstrated through emission testing in accordance with Ohio EPA, Office of Air Pollution Control, Division of Engineering, Engineering Guide #16.

The tons/yr emission limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

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- d. Emission Limitation: 0.44 lb PE/hr, 1.9 tons PE/yr

Applicable Compliance Method: The lb PE/hr was determined by multiplying the maximum heat input capacity of the boiler (22 mmBtu/hr) by the allowable emission rate of 0.020 lb PE/mmBtu of actual heat input. Therefore, provided compliance is shown with OAC 3745-17-10(B), compliance will also be shown with the lb/hr allowable.

The tons/yr emission limitation was developed by multiplying the lb/hr limitation by the maximum operating schedule of 8760 hours/yr and dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance will also be shown with the annual limitation.

- e. Emission Limitation: 0.020 lb PE/mmBtu of actual heat input

Applicable Compliance Method: The permittee shall demonstrate compliance with this limitation by multiplying the maximum hourly natural gas consumption rate (48,000 cu. ft./hr) by the appropriate emission factor from AP-42, Table 1.4-2 (revised 7/98) [1.9 lbs PE (filtrable)/mmCf. ft.] and dividing by the maximum heat input capacity of the boiler (22 mmBtu/hr). If required, compliance shall be determined in accordance with OAC rule 3745-17-03(B)(9).

- f. Emission Limitation: 20% opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method: OAC rule 3745-17-03(B)(1)

## **VI. Miscellaneous Requirements**

None