



Environmental Protection Agency

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

9/27/2012

Larry Krause
Keebler Company
One Trade Street
Mariemont
Cincinnati, OH 45227

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

Facility ID: 1431070662
Permit Number: P0110718
Permit Type: Renewal
County: Hamilton

Certified Mail

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

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. 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 permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Cincinnati Enquirer. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777.

Sincerely,

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

Cc: U.S. EPA Region 5 Via E-Mail Notification
SWOAQA; Indiana; Kentucky



Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

Keebler Company has submitted a renewal of a federally enforceable permit to install and operate (FEPTIO) application for two existing 24.2 mmBtu per hour gas-fired boilers. As part of this renewal FEPTIO request, the Keebler Company has requested restrictions to avoid being subject to area source maximum achievable control technology (MACT), subpart JJJJJJ.

3. Facility Emissions and Attainment Status:

The two existing boilers, emissions units B001 and B002, are subject to both Ohio Administrative Code (OAC) rules 3745-17 and 18. for particulate emissions and sulfur dioxide emissions, respectively, and are located in Hamilton County, which is attainment for all criteria pollutants, except for ozone. Total facility wide hazardous air pollutant (HAP) emissions are below major stationary source emission trigger levels.

4. Source Emissions:

Since both emissions units B001 and B002, along with some other emissions units, located at the facility generated below major stationary source HAP emission threshold levels, therefore, emissions units B001 and B002 would be subject to area source MACT, subpart JJJJJ. However, contained within subpart JJJJJ is an exemption from being subject to that subpart. The Keebler Company thru the issuance of this draft FEPTIO and its final is securing federally enforceable terms to avoid that subpart by incorporating the exemption requirement within this permitting action. This permitting action is deemed to be a synthetic minor permitting action due to following exemption: boilers shall only burn only natural gas except during period of gas curtailment, natural gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

5. Conclusion:

Since the Keebler Company has accepted this hourly and operational exemption limitation to avoid being subject to area source maximum MACT, subpart JJJJJJ, emissions units B001 and B002 are not subject to that subpart.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant

Tons Per Year

There is no permit tons per year allowable emissions associated with this permitting action.

PUBLIC NOTICE
9/27/2012 Issuance of Draft Air Pollution Permit-To-Install and Operate

Keebler Company
One Trade Street, Mariemont
Cincinnati, OH 45227

Hamilton County

FACILITY DESC.: Cookie and Cracker Manufacturing

PERMIT #: P0110718

PERMIT TYPE: Renewal

PERMIT DESC: B001 & B002 - 24.2 MMBTU/HR Gas Fired Boilers w / (option of oil or propane use during NG curtailment) with federally enforceable limitations classifying boilers as gas fired boilers with respect to 40 CFR Part 63 subpart JJJJJJ.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: Bonnie Pray, Southwest Ohio Air Quality Agency, 250 William Howard Taft Rd., Cincinnati, OH 45219. Ph: (513)946-7777



DRAFT

**Division of Air Pollution Control
Permit-to-Install and Operate
for
Keebler Company**

Facility ID:	1431070662
Permit Number:	P0110718
Permit Type:	Renewal
Issued:	9/27/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
Keebler Company

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Authorization

Facility ID: 1431070662

Application Number(s): A0044821

Permit Number: P0110718

Permit Description: B001 & B002 - 24.2 MMBTU/HR Gas Fired Boilers w / (option of oil or propane use during NG curtailment) with federally enforceable limitations classifying boilers as gas fired boilers with respect to 40 CFR Part 63 subpart JJJJJJ.

Permit Type: Renewal

Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 9/27/2012

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Keebler Company
One Trade Street
Mariemont
Cincinnati, OH 45227

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

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

Southwest Ohio Air Quality Agency
250 William Howard Taft Rd.
Cincinnati, OH 45219
(513)946-7777

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0110718

Permit Description: B001 & B002 - 24.2 MMBTU/HR Gas Fired Boilers w / (option of oil or propane use during NG curtailment) with federally enforceable limitations classifying boilers as gas fired boilers with respect to 40 CFR Part 63 subpart JJJJJJ.

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

Group Name: B001B002 24.2 MMbtu Gas Boilers

Emissions Unit ID:	B001
Company Equipment ID:	Boiler #1
Superseded Permit Number:	P0098205
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B002
Company Equipment ID:	Boiler #2
Superseded Permit Number:	P0098205
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

Draft Permit-to-Install and Operate

Keebler Company

Permit Number: P0110718

Facility ID: 1431070662

Effective Date: To be entered upon final issuance

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

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group -B001 and B002 are both 24.2 MMBtu Gas Boilers: B001,B002,

EU ID	Operations, Property and/or Equipment Description
B001	Boiler #1
B002	Boiler #2

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

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

a. None.

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

a. See c)(2), d)(2).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity, as a six minute average, except as specified by rule.
b.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 pound (lb) per million BTU (MMBtu) actual heat input.
c.	OAC rule 3745-18-06(C)	Sulfur dioxide emissions shall not exceed 1.6 lbs per MMBtu actual heat input.
d.	OAC rule 3745-31-05(D)(1)(b). Federal Enforceable Permit To Install and Operate (FEPTIO) to avoid Area Source MACT applicability pursuant to 40 CFR part 63, Subpart JJJJJJ	The permittee is exempt from the area source MACT requirements pursuant to 40 CFR Part 63.11195(e) of Subpart JJJJJJ as long this emissions unit complies with the following requirements: gas-fired boiler as defined in 63.11237 which states a boiler that primarily burns gas is still considered a gas-fired boiler even if it also burns oil or other liquid fuel

Draft Permit-to-Install and Operate

Keebler Company

Permit Number: P0110718

Facility ID: 1431070662

Effective Date: To be entered upon final issuance

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		during periods of gas curtailment, gas supply emergencies, or for periodic testing not to exceed 48 hours during any calendar year. See c)(2).
e.	40 CFR Part 60, Subpart A (40 CFR 60.1-60.19)	Specific general provisions of this section may be applicable.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

- (1) The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in this permit.
- (2) For emission units B001 and B002, the permittee shall burn only natural gas except during periods of gas curtailment, natural gas supply emergencies, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.
- (2) The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the director.
- (3) The permittee shall log any fuel use other than natural gas or propane in B001 & B002. The log shall include the time, in hours, and date of the period when an alternate fuel was used as well as the identification and quantity of the fuel consumed during this time frame. The log shall also include the reason why the alternate fuel was used.

e) Reporting Requirements

- (1) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.
- (3) The permittee shall notify the Southwest Ohio Air Quality Agency in writing of any record which shows a deviation of the limitation outlined in c)(2). The notification shall include a copy of such record and shall be sent the Southwest Ohio Air Quality Agency within 30 days after the deviation occurs.

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), Appendix A, U.S. EPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/MMBtu actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5.

c. Emission Limitation:

Sulfur dioxide emissions shall not exceed 1.6 lbs per MMBtu actual heat input.

Applicable Compliance Method:

Compliance with the allowable sulfur dioxide emission limitation may be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

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

g) Miscellaneous Requirements

(1) None.