



Environmental Protection Agency

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

10/11/2012

Willard Vaughan  
Rohm and Haas Chemicals LLC  
2000 West Street  
Reading, OH 45215

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1431380075  
Permit Number: P0110585  
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
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
309 South Fourth Street, Room 222  
Columbus, OH 43215

If you have any questions, please contact Southwest Ohio Air Quality Agency at (513)946-7777 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPCWeb page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc), by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: SWOAQA





**FINAL**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
Rohm and Haas Chemicals LLC**

Facility ID:	1431380075
Permit Number:	P0110585
Permit Type:	Renewal
Issued:	10/11/2012
Effective:	10/11/2012
Expiration:	10/3/2017





Division of Air Pollution Control
Permit-to-Install and Operate
for
Rohm and Haas Chemicals LLC

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## Authorization

Facility ID: 1431380075  
Application Number(s): A0045101, A0045237  
Permit Number: P0110585  
Permit Description: PTIO Renewal permit for Boilers: B008, B009 and B010.  
Permit Type: Renewal  
Permit Fee: \$0.00  
Issue Date: 10/11/2012  
Effective Date: 10/11/2012  
Expiration Date: 10/3/2017  
Permit Evaluation Report (PER) Annual Date: July 1 - June 30, Due Aug 15

This document constitutes issuance to:

Rohm and Haas Chemicals LLC  
2000 West Street  
Reading, OH 45215

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

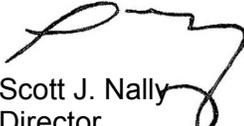
Ohio EPA District Office or local air agency responsible for processing and administering your permit:

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: P0110585

Permit Description: PTIO Renewal permit for Boilers: B008, B009 and B010.

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

<b>Emissions Unit ID:</b>	<b>B010</b>
Company Equipment ID:	29.3 MMBTU/HR CLEAVER BROOKS BOILER
Superseded Permit Number:	P0099870
General Permit Category and Type:	Not Applicable

**Group Name: Boilers B008 & B009**

<b>Emissions Unit ID:</b>	<b>B008</b>
Company Equipment ID:	25.2 MMBTU/HR ATLAS BOILER
Superseded Permit Number:	P0099870
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B009</b>
Company Equipment ID:	12.6 MMBTU/HR AMES BOILER
Superseded Permit Number:	P0099870
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 submitting<sup>1</sup> 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.

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<sup>1</sup>Permittees 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**

**Final Permit-to-Install and Operate**

Rohm and Haas Chemicals LLC

**Permit Number:** P0110585

**Facility ID:** 1431380075

**Effective Date:** 10/11/2012

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) 2., 3., 4., and 5.
2. The actual emissions of Hazardous Air Pollutants (HAPs), as identified in Section 112(b) of Title III of the Clean Air Act from emissions units B008 (Atlas boiler), B009 (Ames boiler), B010 (Cleaves Brook boiler), P004 (chemical pilot plant), P012 (B3 Lubricating Stabilizer), P017 (organotin production), P019 (organotin production), P022 (asphalt additive production), P024 (Thin Film Evaporator), P025 (Stannic Chloride Plant B11), P026 (Stannic Chloride Plant B12), any de minimis emissions units as defined in OAC rule 3745-15-05, any registration status and/or permit exempt emissions units, or future constructed emissions units, shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for any combination of HAPs. Compliance with the above limitations shall be based on a rolling, 12-month summation.
3. The permittee shall collect and record the following information each month for the emissions units identified in 2.:
  - a) For the boilers, the total individual HAP emission factor of each fuel burned in pounds of individual HAP per gallon or cubic foot of fuel burned;
  - b) For the boilers, the number of gallons or cubic feet of each fuel burned;
  - c) For the boilers, the total individual HAP emissions from each fuel burned, in pounds or tons per month [the sum of a) times b) times the emissions factor (if applicable) for each fuel burned];
  - d) For the boilers, the total combined HAP emissions from all fuels burned, in pounds or tons per month [the sum of all individual HAP emissions from c)];
  - e) For non-boiler operations, the total individual HAP emissions for each HAP, in pounds or tons per month plus individual HAP emissions from any de minimis, registration status, and/or permit exempt emissions units at the facility;
  - f) For non-boiler operations, the total combined HAP emissions, in pounds or tons per month plus combined HAP emissions from any de minimis, registration status, and/or permit exempt emissions unit at the facility;
  - g) The total individual HAP emissions for each HAP from all sources, in pounds or tons per month [the sum of c) and e) for each HAP];

**Final Permit-to-Install and Operate**

Rohm and Haas Chemicals LLC

**Permit Number:** P0110585

**Facility ID:** 1431380075

**Effective Date:** 10/11/2012

- h) The total combined HAP emissions from all sources, in pounds or tons per month [the sum of d) and f)];
- i) The updated rolling, 12-month summation of the individual HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months; and
- j) The updated rolling, 12-month summation of the combined HAP emissions, in pounds or tons. This shall include the information for the current month and the preceding eleven calendar months.

\* A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting Southwest Ohio Air Quality Agency. This information does not have to be kept on an individual emissions unit basis.

- 4. The permittee shall submit quarterly deviation reports which identify any exceedance of the HAP emission limitations outlined in 2. If no exceedances occurred, the permittee shall state so in the report. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June, and July through September, respectively).

5. Emission Limitation:

HAP emissions shall not exceed 9.9 TPY for any single HAP and 24.9 TPY for combined HAPs, based on a rolling, 12-month summation for the emissions units listed in 2.

Applicable Compliance Method:

Compliance with the HAP emission limitations in 2. shall be demonstrated by the record keeping requirements specified in 3.

- 6. The Ohio EPA has determined that this facility may be applicable to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>

## **C. Emissions Unit Terms and Conditions**

**1. B010, 29.3 MMBTU/HR CLEAVER BROOKS BOILER**

**Operations, Property and/or Equipment Description:**

29.3 mmBtu/hour natural gas and No. 2 fuel oil-fired boiler (Cleaver Brooks)

- 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 b)(1)b., c)(1), c)(3), d)(3)c., d)(4)b. and e)(1).
- b) Applicable Emissions Limitations and/or Control Requirements
  - (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	See b)(2)(a) through b)(2)(d) and c)(2).  The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and OAC rule 3745-31-05(D).
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid title V permitting)	The sulfur dioxide (SO <sub>2</sub> ) emissions based on a rolling 12-month average for boilers B008, B009 and B010 combined shall not exceed the following: 0.19 ton per year (TPY) of SO <sub>2</sub> when burning natural gas; 64.35 TPY of SO <sub>2</sub> when burning oil.  See Section B.2 , c)(1) and c)(3).
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-17-10(B)(1)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-18-06(D)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

- a. When burning only natural gas, the following emissions limitations shall not be exceeded for this emissions unit:

0.11 lb of nitrogen oxides (NO<sub>x</sub>)/mmBtu of actual heat input;

0.089 lb of carbon monoxide (CO)/mmBtu of actual heat input;

0.008 lb of particulate emissions (PE) and particulate emissions ten microns and less in diameter (PM<sub>10</sub>)/mmBtu of actual heat input;

0.012 lb of organic compounds (OC)/mmBtu of actual heat input; and

0.001 lb of sulfur dioxide (SO<sub>2</sub>)/mmBtu of actual heat input.

The lb/mmBtu emissions limitations above are based on the emissions unit's potential to emit. Therefore, no operational restrictions, monitoring and/or record keeping requirements, and reporting requirements are necessary to demonstrate compliance with these emissions limitations.

- b. When burning No. 2 fuel oil, the following emissions limitations shall not be exceeded:

0.16 lb of NO<sub>x</sub>/mmBtu of actual heat input;

0.039 lb of CO/mmBtu of actual heat input;

0.016 lb of PE/mmBtu of actual heat input;

0.008 lb of PM<sub>10</sub>/mmBtu of actual heat input; and

0.002 lb of OC/mmBtu of actual heat input.

The lb/mmBtu emissions limitations for PE, PM<sub>10</sub>, NO<sub>x</sub>, CO, and OC are based on the emissions units potential to emit. Therefore, no operational restrictions, monitoring and/or record keeping requirements, and reporting requirements are necessary to demonstrate compliance with these emissions limitations.

- c. The annual emissions from the combustion of natural gas for boiler B010 shall not exceed the following:

14.12 TPY of NO<sub>x</sub>;

11.42 TPY of CO;

1.03 TPY of PE/PM<sub>10</sub>; and

1.54 TPY of OC.

The TPY emission limitations for PE, PM<sub>10</sub>, NO<sub>x</sub>, CO, and OC when burning natural gas are based on the emissions units potential to emit. Therefore, no operational restrictions, monitoring and/or record keeping requirements, and reporting requirements are necessary to demonstrate compliance with these emissions limitations.

- d. The annual emissions from the combustion of No. 2 fuel oil for boilers B010 shall not exceed the following:

20.53 TPY of NO<sub>x</sub>;

5.01 TPY of CO;

2.05 TPY of PE;

1.03 TPY of PM<sub>10</sub>; and

0.26 TPY of OC.

- e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the visible emissions limitation, the mass emission limitations, the use of natural gas and/or No. 2 fuel oil and the annual fuel usage restriction.

c) **Operational Restrictions**

- (1) The maximum No. 2 fuel oil usage rate for emissions units B008, B009, and B010, combined shall not exceed 1,800,000 gallons per year, based upon a rolling 12-month summation.
- (2) The permittee shall burn only natural gas and/or No. 2 fuel oil in this emissions unit.
- (3) The quality of the oil burned in this emissions unit shall have a combination of sulfur content and heat content sufficient to comply with a SO<sub>2</sub> emissions limitation of 0.55 lb of SO<sub>2</sub> per mmBtu and shall not exceed a maximum sulfur content of 0.5% by weight.

Compliance with the above-mentioned specification shall be determined by using the analytical results provided by the permittee or oil supplier for each shipment of oil.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below:

a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and 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.

b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee'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).

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 ASTM methods 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 maintain monthly records of the following information for emissions units B008, B009, and B010, combined:

- a. The total volume of natural gas (mmft<sup>3</sup>) burned in this emissions unit.
  - b. The total number of gallons of No. 2 fuel oil used in this boiler for each month.
  - c. The rolling, 12-month summation of the gallons of No. 2 fuel oil used.
- (4) The permittee shall maintain monthly records of the following information for emissions units B008, B009, and B010, combined, in order to monitor compliance with the rolling, 12-month summation emissions limitations for fuel oil:
- a. The total SO<sub>2</sub> emissions, in tons; and
  - b. The rolling, 12-month summation of SO<sub>2</sub> emissions, in tons (the total amount of emissions calculated for the current month plus the total amount of emissions for the previous eleven calendar months).
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. HAP emission limitations outlined in Section B.2.;
    - ii. SO<sub>2</sub> emissions limitations outlined in b)(1)b.; and
    - iii. The rolling, 12-month fuel usage limitation outlined in c)(1).
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

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

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

- (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) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

a. Emissions Limitation:

Visible particulate emissions shall not exceed 20% percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

b. Emissions Limitations:

Particulate emissions (PE/PM10) shall not exceed 0.008 lb/mmBtu of actual heat input and 1.03 TPY of PE/PM10 when firing natural gas; 0.016 lb of PE/mmBtu of actual heat input and 2.05 TPY of PE when firing fuel oil; and 0.008 lb of PM10/mmBtu of actual heat input and 1.03 TPY of PM10 when firing fuel oil.

Applicable Compliance Method:

For the use of natural gas, compliance shall be determined by multiplying the hourly gas burning capacity of the emissions unit (mm cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 7.6 lbs of PE/PM10/mm cu. ft, and then dividing by the maximum hourly heat input of the emissions unit (mmBtu/hr).

When firing No. 2 fuel oil, compliance shall be determined by multiplying the hourly fuel burning capacity of the emissions unit (1000 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (5/10) emission factor of 2.0 lbs of filterable PE/1000 gallons (or for PM10, the AP-42, Fifth Edition, Section 1.3, Table 1.3-6 (5/10) emission factor of 1.0 lb of PM10/1000 gallons) and then dividing by the maximum hourly heat input of the emissions unit (mmBtu/hr).

Compliance with the annual emissions limitations may be demonstrated by multiplying the lb of PE/PM10/mmBtu value by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

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

c. Emissions Limitations:

Sulfur dioxide emissions shall not exceed:

0.001 lb of SO<sub>2</sub>/mmBtu of actual heat input; and 0.19 TPY of SO<sub>2</sub> for B008-B010, combined, when burning natural gas; and 0.55 lb of SO<sub>2</sub>/mmBtu of actual heat input; and 64.35 TPY of SO<sub>2</sub> for B008-B010, combined, when burning fuel oil.

Applicable Compliance Method:

For the use of natural gas, compliance shall be determined by multiplying the hourly gas burning capacity of the emissions unit (mm cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 0.6 lbs of SO<sub>2</sub>/mm cu. ft, and then dividing by the maximum hourly heat input of the emissions unit (mmBtu/hr). For natural gas, the combined annual limit is based upon the emissions units' potential to emit as provided in PTI application 14-05744 submitted on July 5, 2005 and the following calculation:

Annual emissions = 67.1 mmBtu/hr for B008-B010, combined, divided by 950 Btu/cu ft x 0.6 lbs/mm cubic feet of natural gas (per AP-42 Section 1.4 emissions factors) x 8760 hours per year divided by 2000 pounds per ton.

For the use of No. 2 fuel oil, compliance shall be determined by the emissions factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5th Edition, Section 1.3, Table 1.3-1 (5/10), where the SO<sub>2</sub> emissions factor in lb/1000 gallons = 142(S) and S = the percent sulfur content of the oil. Compliance with the lb/mmBtu emissions limitation shall be based upon the record keeping in term and condition d)(2).

The annual emissions from emission units B008, B009, and B010, combined, shall be summed over the rolling 12-month period to determine compliance with the annual emissions limitation. SO<sub>2</sub> annual emissions rate = 0.55 lb SO<sub>2</sub>/mmBtu x 1,800,000 gal/yr x 0.130 mmBtu/gal divided by 2000 lb/ton = 64.35 TPY SO<sub>2</sub>.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emissions limitation through emissions tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 6.

d. Emissions Limitations:

0.11 lb of NO<sub>x</sub>/mmBtu of actual heat input and 14.12 TPY NO<sub>x</sub> when burning natural gas; and 0.16 lb of NO<sub>x</sub>/mmBtu of actual heat input and 20.53 TPY NO<sub>x</sub> when burning fuel oil.

Applicable Compliance Method:

When burning natural gas, compliance shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu.ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emission factor of 100 lbs of NO<sub>x</sub>/mmcu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

When burning No. 2 fuel oil, compliance shall be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (5/10) emission factor of 20 lbs of NO<sub>x</sub>/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

Compliance with the annual emissions limitations may be demonstrated by multiplying the lb of NO<sub>x</sub>/mmBtu value by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emissions limitation through emissions tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 7.

e. Emissions Limitations:

0.089 lb of CO/mmBtu of actual heat input and 11.42 TPY of CO when burning natural gas; and 0.039 lb of CO/mmBtu of actual heat input and 5.01 TPY of CO when burning No. 2 fuel oil.

Applicable Compliance Method:

When burning natural gas, compliance shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu.ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-1 (revised 7/98) emissions factor of 84 lbs of CO/mm cu. ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

When burning No. 2 fuel oil, compliance shall be determined by multiplying the maximum fuel oil capacity of the emissions unit (1000 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (5/10) emissions factor of 5 lbs of CO/1000 gallons of fuel oil and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

Compliance with the annual emissions limitations may be demonstrated by multiplying the lb of CO/mmBtu value by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emissions limitation in accordance with 40 CFR, Part 60, Appendix A, Methods 1-4, and 10.

f. Emissions Limitations:

0.012 lb of OC/mmBtu of actual heat input and 1.54 TPY of OC when burning natural gas; and 0.002 lb of OC/mmBtu of actual heat input and 0.26 TPY of OC when burning No. 2 fuel oil.

Applicable Compliance Method:

When burning natural gas, compliance shall be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (mm cu ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 11 lbs of OC/mm cu.ft of natural gas, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

When burning No. 2 fuel oil, compliance shall be determined by multiplying the maximum fuel oil capacity of the emissions unit (gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-3 (5/10) emission factor of 0.252 lb of OC/1000 gallons of fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (mmBtu/hr).

Compliance with the annual emissions limitations may be demonstrated by multiplying the lb of OC/mmBtu value by the maximum rated heat input capacity of the emissions unit (in mmBtu/hr), then multiplying by 8760 hrs/yr and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/mmBtu emissions limitations in accordance with 40 CFR, Part 60, Appendix A, Methods 1-4, and 25.

(2) Compliance with the fuel usage limitations in c)(1), shall be demonstrated by the record keeping in d)(3).

(3) Compliance with the fuel employed limitation in c)(2), shall be demonstrated by the record keeping in d)(1).

g) Miscellaneous Requirements

(1) None.

**2. Emissions Unit Group -Boilers B008 & B009: B008,B009,**

EU ID	Operations, Property and/or Equipment Description
B008	25.2 mmBtu/hour natural gas and No. 2 fuel oil-fired boiler (Atlas boiler)
B009	12.6 mmBtu/hour natural gas and No. 2 fuel oil-fired boiler, (Ames boiler)

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

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

a. None.

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

a. b)(1)a., b)(2)b., c)(1), c)(3), d)(3)c., d)(4)b. and e)(1).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(F) (Synthetic minor to avoid title V permitting)	See Section B.2, b)(2)(a), b)(2)(b), and c)(1) through c)(3).
b.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
c.	OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.020 lb/mmBtu of actual heat input when burning natural gas or No.2 fuel oil.
d.	OAC rule 3745-18-06(D)	The emissions limitation specified by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(F).

(2) Additional Terms and Conditions

- a. The total combined annual emissions from the combustion of natural gas for boilers B008, B009 and B010 shall not exceed the following:

0.19 ton per year (TPY) of sulfur dioxide (SO<sub>2</sub>)

The TPY emissions limitations for SO<sub>2</sub> when burning natural gas are based on the emissions units' potential to emit. Therefore, no operational restrictions, monitoring and/or record keeping and reporting requirements are necessary to demonstrate compliance with this emissions limitation.

- b. The total combined emissions from the combustion of No. 2 fuel oil for boilers B008, B009 and B010 shall not exceed the following emissions limitation, based upon a rolling, 12-month summation: 64.35 TPY of SO<sub>2</sub>.

c) Operational Restrictions

- (1) The maximum No. 2 fuel oil usage rate for emissions units B008, B009, and B010, combined shall not exceed 1,800,000 gallons per year, based upon a rolling 12-month summation.
- (2) The permittee shall burn only natural gas and/or No. 2 fuel oil in this emissions unit.
- (3) The quality of the oil burned in this emissions unit shall have a combination of sulfur content and heat content sufficient to comply with a SO<sub>2</sub> emissions limitation of 0.55 lb of SO<sub>2</sub> per mmBtu and shall not exceed a maximum sulfur content of 0.5% by weight.

Compliance with the above-mentioned specification shall be determined by using the analytical results provided by the permittee or oil supplier for each shipment of oil.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below:

a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and 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.

b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee'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).

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 ASTM methods 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 maintain monthly records of the following information for emissions units B008, B009, and B010, combined:
- a. The total volume of natural gas (mmft<sup>3</sup>) burned in this emissions unit.
  - b. The total number of gallons of No. 2 fuel oil used in this boiler for each month.
  - c. The rolling, 12-month summation of the gallons of No. 2 fuel oil used.
- (4) The permittee shall maintain monthly records of the following information for emissions units B008, B009, and B010, combined, in order to monitor compliance with the rolling, 12-month summation emissions limitations for fuel oil:
- a. The total SO<sub>2</sub> emissions, in tons; and
  - b. The rolling, 12-month summation of SO<sub>2</sub> emissions, in tons (the total amount of emissions calculated for the current month plus the total amount of emissions for the previous eleven calendar months).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
  - a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:
    - i. HAP emission limitations outlined in Section B.2.;
    - ii. SO<sub>2</sub> emissions limitations outlined in b)(2)b.; and
    - iii. The rolling, 12-month fuel usage limitation outlined in c)(1).
  - b. the probable cause of each deviation (excursion);
  - c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
  - d. the magnitude and duration of each deviation (excursion).

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

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

- (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) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

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

- a. Emissions Limitation:

Visible particulate emissions shall not exceed 20% percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

b. Emissions Limitation:

Particulate emissions (PE) shall not exceed 0.020 lb/mmBtu of actual heat input when firing natural gas or No. 2 fuel oil.

Applicable Compliance Method:

When firing natural gas, compliance may be determined by multiplying the maximum hourly gas burning capacity of the emissions unit (0.0252 mm cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 1.9 lbs of filterable PE/mm cu. ft, and then dividing by the maximum hourly heat input capacity of the emissions unit (25.2 mmBtu/hr).

When firing no. 2 fuel oil, compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (thousand gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (5/10) emission factor of 2.0 lbs of filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (25.2 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/mmBtu emissions limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9) while firing no. 2 fuel oil.

c. Emissions Limitation:

Sulfur dioxide emissions shall not exceed 0.55 lb of SO<sub>2</sub> /mmBtu of actual heat input (fuel oil firing).

Applicable Compliance Method:

Compliance with the allowable sulfur dioxide emissions limitation may be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation in c)(3).

For the use of number 2 fuel oil, the emissions limitation shall be based upon the emission factor from AP-42, "Compilation of Air Pollutant Emission Factors", 5<sup>th</sup> Edition, Section 1.3, Table 1.3-1 (5/10) where SO<sub>2</sub> emissions factor in lb/1000 gallons = 142(S) and S = the percent sulfur content of the oil employed. Compliance with the lb/mmBtu emission limitation shall be based upon the record keeping in d)(2).

If required, the permittee shall demonstrate compliance with the lb/mmBtu emissions limitation through emissions tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 4, and 6.

d. Emission Limitations:

64.35 TPY of SO<sub>2</sub> for B008-B010, combined, when firing No. 2 fuel oil.

Applicable Compliance Method:

The actual annual emission rate shall be calculated by using the actual fuel oil usages and emission factors specified below. When firing fuel oil, the annual emissions from emission units B008, B009, and B010, combined, shall be summed over the rolling 12 month period to determine compliance with the annual emission limitation for fuel oil.

For SO<sub>2</sub> from No. 2 oil:

SO<sub>2</sub> annual emissions rate = 0.55 lb SO<sub>2</sub>/mmBtu x 1,800,000 gal/yr x 0.130 mmBtu/gal divided by 2000 lb/ton = 64.35 TPY SO<sub>2</sub>.

e. Emissions Limitations:

0.19 TPY of SO<sub>2</sub> for B008-B010, combined, when firing natural gas.

Applicable Compliance Method:

For natural gas, the combined annual limit is based upon the emissions units' potential to emit as provided in PTI application 14-05744 submitted on July 5, 2005 and the following calculation:

Annual emissions = 67.1 mmBtu/hr for B008-B010, combined, divided by 950 Btu/cu ft x 0.6 lbs/mm cubic feet of natural gas (per AP-42 Section 1.4 emissions factors) x 8760 hours per year divided by 2000 pounds per ton.

- (2) Compliance with the fuel usage limitations in c)(1), shall be demonstrated by the record keeping in d)(3).
- (3) Compliance with the fuel employed limitation in c)(2), shall be demonstrated by the record keeping in d)(1).

g) Miscellaneous Requirements

- (1) None.