

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install: **03-17154**

A. Source Description

This permit addresses the installation of a 1490 hp (10 mmBtu/hr) diesel fired generator at Marion Correctional Institute in Marion County.

B. Facility Emissions and Attainment Status

This facility is potentially major for NO_x and SO₂ for Title V purposes. Marion county is in attainment/unclassifiable for all criteria pollutants.

C. Source Emissions

Potential Emissions: The potential emissions for this emissions unit are based on a fuel input capacity of 10 mmBtu/hr and emission factors from AP-42, Section 3.4 (10/96).

NO_x: (10 mmBtu/hr) (3.2 lbs/mmBtu) (8760 hrs/yr) (ton/2000 lbs) = **140.16 tons/yr***

CO: (10 mmBtu/hr) (0.85 lb/mmBtu) (8760 hrs/yr) (ton/2000 lbs) = 37.23 tons/yr

SO₂: (10 mmBtu/hr) (0.32 lb/mmBtu) (8760 hrs/yr) (ton/2000 lbs) = 14.15 tons/yr**

VOC: (10 mmBtu/hr) (0.09 lb/mmBtu) (8760 hrs/yr) (ton/2000 lbs) = 3.94 tons/yr

PE: (10 mmBtu/hr) (0.062 lb/mmBtu) (8760 hrs/yr) (ton/2000 lbs) = 2.72 tons/yr

PM10: (10 mmBtu/hr) (0.0573 lb/mmBtu) (8760 hrs/yr) (ton/2000 lbs) = 2.51 tons/yr

*The NO_x emissions are greater than the Title V threshold level (100 tons per year).

**SO₂ emissions from this unit and others at the facility could from a potential to emit at 8760 hrs/yr exceed Title V major thresholds.

Restricted Emissions: The company wishes to avoid triggering Title V, so they have accepted federally enforceable limits on the annual hours of operation (800 hours per year).

NO_x: (10 mmBtu/hr) (3.2 lbs/mmBtu) (800 hrs/yr) (ton/2000 lbs) = 12.80 tons/yr

CO: (10 mmBtu/hr) (0.85 lb/mmBtu) (800 hrs/yr) (ton/2000 lbs) = 3.40 tons/yr

SO₂: (10 mmBtu/hr) (0.32 lb/mmBtu) (800 hrs/yr) (ton/2000 lbs) = 1.29 tons/yr

VOC: (10 mmBtu/hr) (0.09 lb/mmBtu) (800 hrs/yr) (ton/2000 lbs) = 0.36 tons/yr

PE: (10 mmBtu/hr) (0.062 lb/mmBtu) (800 hrs/yr) (ton/2000 lbs) = 0.25 tons/yr

PM10: (10 mmBtu/hr) (0.0573 lb/mmBtu) (800 hrs/yr) (ton/2000 lbs) = 0.23 tons/yr

D. Conclusion

With the synthetic minor restrictions, potential emissions do not trigger Title V threshold levels.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL
MARION COUNTY**

CERTIFIED MAIL

Street Address:

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

Mailing Address:
Lazarus Gov.
Center

Application No: 03-17154

Fac ID: 0351010182

DATE: 7/6/2006

Marion Correctional Institution
Michael Marsh
9841 York Alpha Drive, Unit D
North Royalton, OH 44133

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on 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 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 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 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 a fee of **\$400** 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

NWDO

PUBLIC NOTICE

ISSUANCE OF DRAFT PERMIT TO INSTALL **03-17154** FOR AN AIR CONTAMINANT SOURCE FOR
Marion Correctional Institution

On 7/6/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Marion Correctional Institution**, located at **940 Marion Williamsport Road, Marion, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 03-17154:

Emergency diesel generator.

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 PERMIT TO INSTALL 03-17154

Application Number: 03-17154
Facility ID: 0351010182
Permit Fee: **To be entered upon final issuance**
Name of Facility: Marion Correctional Institution
Person to Contact: Michael Marsh
Address: 9841 York Alpha Drive, Unit D
North Royalton, OH 44133

Location of proposed air contaminant source(s) [emissions unit(s)]:
**940 Marion Williamsport Road
Marion, Ohio**

Description of proposed emissions unit(s):
Emergency diesel generator.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Marion Correctional Institution
PTI Application: 03-17154
Issued: To be entered upon final issuance
Part I - GENERAL TERMS AND CONDITIONS

Facility ID: 0351010182

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections,

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conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

6. Permit Transfers

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

7. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental

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Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

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

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available

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Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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

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

14. Construction Compliance Certification

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

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
NOx	12.80
CO	3.40
SO ₂	1.29
VOC	0.36
PE	0.25
PM10	0.23

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.

Add rows as necessary**Operations, Property, and/or Equipment - (P002) - 1490 hp (10 mmBtu/hr) diesel fired generator (generator 1)**

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	32.0 lbs nitrogen oxides (NO _x)/hr
	8.50 lbs carbon monoxide (CO)/hr
	3.23 lbs sulfur dioxide (SO ₂)/hr
	0.90 lb volatile organic compounds (VOC)/hr
	0.62 lb particulate emissions (PE)/hr
	0.573 lb particulate matter less than 10 microns in size (PM ₁₀)/hr
	Visible particulate emissions shall not exceed 10% opacity, as a 6-minute average, except during start-up and shutdown.
	See A.2.a
	See A.2.a
OAC rule 3745-31-05(C)	12.80 tons NO _x per rolling, 12-month period
	3.40 tons CO per rolling, 12-month period
	1.29 tons SO ₂ per rolling, 12-month period
	0.36 ton VOC per rolling, 12-month period
	0.25 ton PE per rolling, 12-month period
	0.23 ton PM ₁₀ per rolling, 12-month period
	See A.2.b
OAC rule 3745-17-07(A)	See A.2.c
OAC rule 3745-17-11(B)(5)(b)	0.062 lb PE/mmBtu
OAC rule 3745-18-06(G)	See A.2.d
OAC rule 3745-21-07(B)	See A.2.c
OAC rule 3745-21-08(B)	See A.2.e
OAC rule 3745-23-06(B)	See A.2.f

2. Additional Terms and Conditions

- The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-31-05(C) and OAC rule 3745-17-11(B)(5)(b).

2.b This permit establishes the following federally enforceable emission limitations based on an hours of operation restriction (See B.2) for purposes of avoiding Title V applicability.:

- i. 12.80 tons NOx per rolling, 12-month period;
- ii. 1.29 tons SO2 per rolling, 12-month period

The annual hours of operation restriction also effectively restricts emissions of CO, VOC, PE, and PM10.

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

2.d This emissions unit is exempt from the requirements of OAC rule 3745-18-06 pursuant to OAC rule 3745-18-06(B).

2.e The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-21-07(B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

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

2.f The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this Permit to Install.

On February 14, 2005, OAC rule 3745-23-06 was rescinded; therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State

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Implementation Plan (SIP). Therefore, until the U.S. EPA approves the revision to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.g** The hourly emission limitations represent the potential to emit for this emissions unit. Therefore, no monitoring, record keeping, or reporting requirements are necessary to ensure compliance with these emission limitations.

B. Operational Restrictions

1. The permittee shall combust only distillate fuel oil in this emissions unit.

The oil combusted in this emissions unit shall only be distillate oil (fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78, 89, 90, 92, 96, or 98, "Standard Specification for Fuel Oils"). The sulfur content of the distillate oil shall contain no more than 0.32 weight percent sulfur.

2. The maximum annual hours of operation for emissions unit P002 shall not exceed 800 hours per year, based upon a rolling 12-month summation of the operating hours.

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

<u>Month(s)</u>	<u>Maximum Allowable Hours of Operation</u>
1	160
1-2	320
1-3	480
1-4	640
1-12	800

After the first 12 calendar months of operation, following issuance of this permit, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the monthly operating hours rates.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

Emissions Unit ID: P002

- a. the hours of operation;
 - b. the calculated monthly emission rate for NOx using the following equation: NOx emissions in tons = (hours of operation) x (potential hourly NOx emissions) x (1 ton/2000 lbs) = (C.1.a) x (32.0 lbs NOx) x (1/2000 lbs);
 - c. the calculated monthly emission rate of SO2 using the following equation: SO2 emissions in tons = (hours of operation) x (potential hourly SO2 emissions) x (1 ton/2000 lbs) = (C.1.a) x (3.23 lbs SO2) x (1/2000 lbs);
 - d. for the first 12 months of operation, following the issuance of this permit, the cumulative year-to-date total for:
 - i. NOx emissions, in tons;
 - ii. SO2 emissions, in tons; and
 - iii. hours of operations.
 - e. beginning the first month, after the first 12 months of operation following the issuance of this permit, the following summations:
 - i. the rolling, 12-month NOx emission rates, in tons;
 - ii. the rolling, 12-month SO2 emission rates, in tons; and
 - iii. the rolling, 12-month hours of operation.
2. For each day during which the permittee burns a fuel other than distillate fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
 3. The permittee shall use records of fuel supplier certification to demonstrate compliance with the operational restriction in section B.1. Records of fuel supplier certification shall include the following information:
 - a. the name of the oil supplier; and
 - b. a statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in B.1 above.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify the following:

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exceedances:

- a. All exceedances of the rolling, 12-month restriction of 800 hours;
- b. All exceedances of the rolling, 12-month NO_x emission limitation of 12.80 tons;
- c. All exceedances of the rolling, 12-month SO₂ emission limitation of 1.29 tons;
- d. For the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation specified in section B.2.
- e. All exceedances of the sulfur content fuel restriction specified in condition B.1.

These deviation (excursion) reports shall be submitted in accordance with the general terms and conditions of this permit.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than distillate fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

E. Testing Requirements

1. Compliance with the emission limitations in the terms and conditions of this permit shall be determined in accordance with the following methods:
 - a. Emission Limitation: 32.0 lbs NO_x/hr and 12.80 tons of NO_x per rolling, 12-month period

Applicable Compliance Method: The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*Potential to emit for this emissions unit was established by multiplying the maximum fuel input rate of 10 mmBtu/hr and an emission factor of 3.2 lbs/mmBtu [from AP-42, Section 3.4 (10/96)].

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4 and 7 of 40 CFR Part 60, Appendix A.

Emissions Unit ID: P002

Compliance with the tons of NO_x per rolling 12-month period limitation shall be demonstrated by the recordkeeping requirements in section C.1.

- b. Emission Limitation: 8.50 lbs CO/hr and 3.40 tons of CO per rolling, 12-month period

Applicable Compliance Method: The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*Potential to emit for this emissions unit was established by multiplying the maximum fuel input rate of 10 mmBtu/hr and an emission factor of 0.85 lbs/mmBtu [from AP-42, Section 3.4 (10/96)].

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4 and 10 of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by a maximum operating schedule of 800 hours per rolling, 12-month period and dividing by 2000 lbs/ton. Therefore provided compliance is shown the hourly limitation and with the 800 hours per rolling 12-month period operational restriction, compliance with the annual limitation will be assumed.

- c. Emission Limitation: 3.23 lbs SO₂/hr and 1.29 tons of SO₂ per rolling, 12-month period

Applicable Compliance Method: The hourly emission limitation was established by multiplying an emission factor of 1.01 (S) lb SO₂/mmBtu from AP-42, Table 3.4-1 (revised 10/96) by the maximum percentage of sulfur (S=0.32), by weight, in the distillate oil by the maximum heat input of the generator (10 mmBtu/hr). Therefore provided compliance is shown with the maximum sulfur content of 0.32% wt, compliance with the hourly limitation will be assumed.

If required, the permittee shall demonstrate compliance in accordance with the test methods and procedures in Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

Compliance with the tons of SO₂ per rolling 12-month period limitation shall be demonstrated by the recordkeeping requirements in section C.1.

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- d. Emission Limitation: 0.90 lb VOC/hr and 0.36 ton of VOC per rolling, 12-month period

Applicable Compliance Method: The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*Potential to emit for this emissions unit was established by multiplying the maximum fuel input rate of 10 mmBtu/hr and an emission factor of 0.09 lbs/mmBtu [from AP-42, Section 3.4 (10/96)].

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4 and 18, 25 or 25A, as applicable, of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly emission limitation by a maximum operating schedule of 800 hours per rolling, 12-month period and dividing by 2000 lbs/ton. Therefore provided compliance is shown the hourly limitation and with the 800 hours per rolling 12-month period operational restriction, compliance with the annual limitation will be assumed.

- e. Emission Limitation: 0.062 lb PE/mmBtu and 0.25 ton of PE per rolling, 12-month period

Applicable Compliance Method: The lb/mmBtu emission limitation represents the potential to emit* for this emissions unit. Therefore no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*Potential to emit was determined using AP-42, Chapter 3.4, Table 3.4-1 (revised 10/96).

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by multiplying the emission limitation of 0.062 lb PE/mmBtu, a maximum heat input of 10 mmBtu/hr, a maximum operating schedule of 800 hours per rolling, 12-month period and dividing by 2000 lbs/ton. Therefore provided compliance is shown the hourly limitation and with the 800 hours per rolling 12-month period operational

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restriction, compliance with the annual limitation will be assumed.

- f. Emission Limitation: 0.573 lb PM10/hr and 0.23 ton of PM10 per rolling, 12-month period

Applicable Compliance Method: The hourly emission limitation represents the potential to emit* for this emissions unit. Therefore no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*Potential to emit for this emissions unit was established by multiplying the maximum fuel input rate of 10 mmBtu/hr and an emission factor of 0.0573 lbs/mmBtu [from AP-42, Section 3.4 (10/96)].

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 201/201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the appropriate Ohio EPA District Office or local air agency

The annual emission limitation was established by multiplying the hourly emission limitation by a maximum operating schedule of 800 hours per rolling, 12-month period and dividing by 2000 lbs/ton. Therefore provided compliance is shown the hourly limitation and with the 800 hours per rolling 12-month period operational restriction, compliance with the annual limitation will be assumed.

- g. Emission Limitation: Visible particulate emissions shall not exceed 10% opacity, as a 6-minute average, except during start-up or shutdown

Applicable Compliance Method: If required, the permittee shall demonstrate compliance by testing in accordance with Method 9 of 40 CFR Part 60, Appendix A.

F. Miscellaneous Requirements

1. The following terms and conditions are federally enforceable: A.1, B.2, C.1, D.1, E.1.a and E.1.c.