



State of Ohio Environmental Protection Agency

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Street Address:

Lazarus Gov. Center
50 West Town Street, Suite 700
Columbus, OH 43215

TELE: (614) 644-3020 FAX: (614) 644-2329

CANTON CITY HEALTH DEPT.
AIR POLLUTION DIVISION
Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

CERTIFIED MAIL

RE: FINAL PERMIT TO INSTALL

STARK COUNTY

Application No: 15-01676

Fac ID: 1576131996

DATE: 9/25/2007

Vision Power Systems Inc. at FibreCorr
Alex Spitz
3733 Crown Point Rd.
Jacksonville, FL 32257

	TOXIC REVIEW
	PSD
	SYNTHETIC MINOR
	CEMS
	MACT
40 CFR Part 60, Subpart Dc	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

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.

You are hereby notified that this action of the Director is final 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 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

Sincerely,

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

CC: USEPA

Canton LAA



Permit To Install
Terms and Conditions

Issue Date: 9/25/2007
Effective Date: 9/25/2007

FINAL PERMIT TO INSTALL 15-01676

Application Number: 15-01676

Facility ID: 1576131996

Permit Fee: **\$400**

Name of Facility: Vision Power Systems Inc. at FibreCorr

Person to Contact: Alex Spitz

Address: 3733 Crown Point Rd.
Jacksonville, FL 32257

Location of proposed air contaminant source(s) [emissions unit(s)]:
670 17th St., NW
Massillon, Ohio

Description of proposed emissions unit(s):
State only PTI for the installation of a 84 mmBtu/hr pyrolytic wood burning boiler for steam generation.

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

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

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 (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. 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, 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 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 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>
PE	7.37
PM-10	7.37
CO	62.3
SOx	9.2
NOx	68.2
VOC	6.26

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.

Operations, Property, and/or Equipment - (B001) - 84 mmBtu/hr. steam generating boiler which fires wood fuel via a pyrolysis process. This emission unit utilizes a baghouse emission control devices to control PE.

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	15.6 lbs NOx/hour and 68.2 tons NOx/yr. 14.2 lbs CO/hour and 63.2 tons CO/yr.
ORC 3704.03(T)(4)	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the VOC and SO2 emissions from this air contaminant source since the uncontrolled potential to emit for VOC emissions are less than 10 tpy.
OAC rule 3745-31-05(C)	Permit to Install 15-01676 for this air contaminant source takes into account the use of a baghouse as proposed by the permittee for the purpose of avoiding PE Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3).
OAC rule 3745-21-08(B)	See A.2.a.
40 CFR Part 60.43c(c)	Stack emissions shall not exceed an opacity of 20 % as a 6 minute average except for one 6-minute period per hour of not more than 27 percent opacity.
40 CFR Part 60.43c(e)(1) (Subpart Dc)	0.03 lbs PM/mmBtu
OAC rule 3745-17-10(C)(1) Figure 1.	The emission limitation specified under this rule is less stringent than the 40 CFR Part 60.43c(e)(1) emission limitation specified above.
OAC rule 3745-17-07(A)	The emission limitation specified under this rule is less stringent than the emission limitation specified under rule 40 CFR Part 60.43c(c).

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-17-08(A)	See section A.I.2.g.

2. Additional Terms and Conditions

- a. All new stationary carbon monoxide emission sources shall minimize carbon monoxide emissions by use of the best available control techniques and operating practices in accordance with best current technology.

The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by use of controlled combustion practices.

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.

- b. Since the annual BAT emission limitations for NO_x and CO are based on the potential to emit for this emissions unit, no monitoring, record keeping, or reporting requirements are necessary.
- c. [40 CFR Part 60.47c(a)]
The permittee shall install, calibrate, maintain, and operate a COMS for measuring opacity of the emissions and record the output of the system.
- d. Within 180 days of the effective date of this permit, the permittee shall develop and maintain a written quality assurance/quality control plan for the continuous opacity monitoring system, designed to ensure continuous valid and representative readings of opacity and compliance with 40 CFR Part 60. The plan shall include, at a minimum, procedures for conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring that Performance Specification 1 is maintained on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.
- e. [40 CFR Part 60.47c(b)]
The span value of the opacity COMs shall be between 60 and 80 percent.

- f. [40 CFR Part 60.43c(d)
The PM and opacity standards under this section apply at all times, except during periods of startup, shutdown, and malfunction.

- g. The permittee shall maintain compliance with OAC rule 3745-15-07 and OAC rule 3745-17-02. The requirements of OAC rule 3745-17-08(B), for fugitive emissions in an Appendix A area, currently do not apply to this emissions unit unless if, in the director's judgment, probable cause exists to believe that this emission unit is causing or contributing to a violation of OAC rule 3745-15-07 or OAC rule 3745-17-02. In such cases, the director may require the permittee to submit and implement a control program which will bring the fugitive dust source into compliance with the requirements of OAC rule 3745-17-08(B) as expeditiously as practicable and/or apply for a permit to operate for the fugitive source in accordance with OAC rule 3745-35-02.

B. Operational Restrictions

- 1. The permittee shall not accept wood as fuel that contains adhesives or coatings of any kind or quantity. The permittee shall generate and implement a Fuels Management Plan(FMP) as specified in section C.5.

- 2. In order for this emission unit to operate at an Ohio Acceptable Incremental Impact concentration, the permittee shall operate this emissions unit in accordance with the design and operational features as specified in the PTI application with the following exceptions:
 - 1. The stack height shall be at least 100 feet high.
 - 2. The stack diameter shall be no greater than 60 inches in diameter I.D.
 - 3. The exhaust temperature of the stack gases shall be maintained at least 300 degrees F.

See sections B.4 and E.1 of this permit.

- 4. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether the Ohio Acceptable Incremental Impact for NOx is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that if the Ohio Acceptable Incremental Impact for all criteria pollutants are satisfied. If, upon evaluation, the permittee determines that the Ohio Acceptable Incremental Impact for the criteria pollutants are not satisfied, the permittee will not make the change but submit to the Ohio EPA or local air agency a modified PTI application for review. Also, any modification to this emission unit which triggers OAC rule 3745-31 modification criteria must submit to the Ohio EPA or local air agency a modified PTI application for review.

Changes that can affect the parameters used include the following:

- a. changes in the composition of the materials used or the use of new materials.
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that was proposed in the application and modeled; and
- c. physical changes to any of the emissions units or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the Ohio Acceptable Incremental Impact levels:

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of the evaluation and determination that the changed emissions unit still satisfies the Ohio Acceptable Incremental Impact levels; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results for the change.

C. Monitoring and/or Record keeping Requirements

1. Prior to the installation of the continuous opacity monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 1. The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous opacity monitoring system meets the requirements of Performance Specification 1. Once received, the letter/document of certification shall be maintained on-site and shall be made available to the director (the appropriate Ohio EPA District Office or local air agency) upon request.
2. Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.
3. Within 60 days of the startup of emission unit B001, the permittee shall install, operate, and maintain a continuous opacity monitoring system to continuously monitor and record the opacity of the particulate emissions from this emissions unit. The permittee shall notify the Canton Iaa, in writing, of the startup date of emission unit B001 within two weeks of the

startup date. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

4. The permittee shall maintain records of data obtained by the continuous opacity monitoring system including, but not limited to:
 - a. percent opacity on an instantaneous (one-minute) and 6-minute block average basis;
 - b. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
 - c. hours of operation of the emissions unit, continuous opacity monitoring system, and control equipment;
 - d. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous opacity monitoring system;
 - e. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous opacity monitoring system; and
 - f. the reason (if known) and the corrective actions taken (if any) for each such event in (d) and (e).
5. The permittee shall develop and implement a Fuels Management Plan (FMP) which includes methods and procedures for the screening of fuels to be burned in the boiler, identification of those fuels that are unacceptable, and for the disposition of unacceptable fuels. The plan shall also include action levels upon which plant personnel will respond to unacceptable situations regarding fuels being burned. The plan shall include all monitoring and record keeping required to maintain the plan. The plan shall be in writing and submitted to the Canton local air agency at least 60 days prior to startup of the boiler system for approval.

D. Reporting Requirements

1. [40 CFR Part 60.48c(a)]
The permittee shall submit notification of the date of construction or reconstruction and actual startup, as provided by 40 CFR part 60.7. This notification shall include all elements listed in 40 CFR Part 60.48c(1 thru 4).
2. [40 CFR Part 60.48c(b)]
The permittee shall submit to the Administrator and the Canton laa the performance test data from the initial and any subsequent performance tests and the performance evaluation of the CEMS and/or COMS using the applicable performance specifications in appendix B of this part.

3. [40 CFR Part 60.48c(c)]
The permittee shall submit excess emission reports for any excess emissions from the affected facility that occur during the reporting period.
4. The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous opacity monitoring system:
 - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of opacity values in excess of any limitation specified in this permit, 40 CFR Part 60, OAC rule 3745-17-07, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude (percent opacity) of each 6-minute block average exceeding the applicable opacity limitation(s), as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. If there are no exceedances during the calendar quarter, the permittee shall submit a statement to that effect.
 - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous opacity monitor;
 - iii. the location of the continuous opacity monitor;
 - iv. the exceedance report as detailed in (a) above;
 - v. the total operating time (hours) of the emissions unit;
 - vi. the total operating time of the continuous opacity monitoring system while the emissions unit was in operation;
 - vii. the date, time, and duration of any/each malfunction* of the continuous opacity monitoring system, emissions unit, and/or control equipment;
 - viii. the date, time, and duration of any downtime* of the continuous opacity monitoring system and/or control equipment while the emissions unit was in operation; and
 - ix. the reason (if known) and the corrective actions taken (if any) for each event in (b)(vii) and (viii).
5. Each report shall address the operations conducted and data obtained during the previous calendar quarter.
6. Each downtime and malfunction event shall be reported regardless if there is an exceedance of the opacity limit.

7. [40 CFR Part 60.48c(g)(1)]
The permittee shall record and maintain records of the amount of wood fuel combusted during each operating day.

E. Testing Requirements

1. Compliance with the emission limitations specified in section A.I.1 shall be demonstrated by the use of the following methods and procedures:

- a. Emission Limitation:

15.6 lbs NOx/hour and 68.2 tons NOx/year
14.2 lbs CO/hour and 62.3 tons CO/year

Applicable Compliance Method:

If required, compliance with the hourly mass emission limitations for NOx and CO shall be demonstrated by emission testing using US EPA method 7E and method 10B, respectively. Alternative US EPA promulgated methods may be used with the approval of Ohio EPA and/or the Canton local air agency.

Since the tons per year mass emission limitations of 62.3 tons NOx/year and 68.2 tons CO/year are this emission unit's potential to emit based on the hourly mass emission limitations above, compliance shall be demonstrated with the tons/year limitations upon demonstration of compliance with the hourly mass emission limitations.

- b. Emissions Limitation:

Stack emissions shall not exceed an opacity of 20 % as a 6 minute average except for one 6-minute period per hour of not more than 27 percent opacity.

Applicable Compliance Method:

Compliance shall be demonstrated through the use of a continuous opacity monitoring system as specified in section C.(1 thru 4)

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

- c. Emissions Limitation:

0.03 lbs PM/mmBtu

Applicable Compliance Method:

If required, compliance with this mass emission limitation shall be demonstrated by emissions testing using applicable test methods as specified in 40 CFR Part 60.45c.

2. COM Certification

- a. Within 60 days of the startup of this emissions unit, the permittee shall conduct certification tests on the continuous opacity monitoring system equipment pursuant to 40 CFR Part 60, Appendix B, Performance Specification 1 and ORC section 3704.03(I). The permittee shall notify, in writing, the Canton laa of the startup date of this emissions unit within at least two weeks of startup.
- b. Personnel from the Ohio EPA Central Office and the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the appropriate Ohio EPA District Office or local air agency and one copy to Ohio EPA Central Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.
- c. Certification of the continuous opacity monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1; ORC section 3704.03(I); and ASTM D 6216-98.
- d. Ongoing compliance with the opacity limitation contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and re-certification requirements of 40 CFR Part 60.

3. The permittee shall conduct emissions testing for this emissions unit in accordance with the following requirements:

- a. Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after the initial startup of such facility, and at such other times as may be required by the Administrator under section 114 of the Act, Ohio EPA, or the Canton local air agency, the permittee shall conduct performance test(s).
- a. Emissions testing shall be conducted at two operating levels. One test shall be conducted at 20 % heat input capacity of the boiler and the other shall be conducted at maximum (100 %) heat input capacity of the boiler.

- b. The permittee shall conduct emissions testing at both boiler operating levels to demonstrate compliance with the grain loading limitation for PM/PM10 and the NOx and CO limitations specified in section A.I.1 as follows:
- PM/PM-10 Testing to be conducted in accordance with applicable sections of 40 CFR Part 60.45c(a).
- NOx Testing to be conducted in accordance with US EPA Method 7E or an alternative US EPA method from 40 CFR part 60, Appendix A that has been approved by Ohio EPA and the Canton laa.
- CO Testing to be conducted in accordance with US EPA Method 10B or an alternative US EPA method from 40 CFR part 60, Appendix A that has been approved by Ohio EPA and the Canton laa..
- c. The permittee shall conduct emissions testing at both boiler operating levels to verify emission factors for SO2 and VOC, in lbs pollutant/mmBtu, that have been used to establish emission limitations specified in section A.I.1. This testing is being requested due to the unique type of combustion being utilized in this emission unit (i.e.; pyrolysis burning of wood). The permittee shall utilize the following US EPA test methods from 40 CFR Part 60, Appendix A for conducting the tests:
- SO2 Testing to be conducted in accordance with US EPA Method 6 or an alternative US EPA method from 40 CFR part 60, Appendix A as approved by Ohio EPA and the Canton laa.
- VOC Testing to be conducted in accordance with US EPA Method 25 or 25A or approved alternative US EPA method from 40 CFR part 60, Appendix A as approved by Ohio EPA and the Canton laa.
- d. The permittee shall collect representative grab samples of the wood fuel as it is being fed to the boiler system every 15 minutes during the test. The grab samples collected over the SO2 and VOC sampling periods each hour of testing shall be composited and a representative sample of that composite shall be analyzed by an independent, approved testing laboratory for moisture content, total sulfur, and total carbon, and total organic carbon. The testing laboratory shall utilize standard, documented methods for analysis.
- e. During the tests for compliance with the grain loading limitation specified in section A.I.1, the permittee shall operate the calibrated COM to record opacity data. In lieu of using the COM, method 9 visible emissions observations may be used on the stack servicing this emissions unit during the tests.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test(ITT)" notification to the Canton Local Air Agency. The ITT shall describe in detail the proposed test methods and procedures, the emissions unit

operating parameters, the time(s) and date(s) of the test(s), and the person conducting the tests. Failure to submit such a notification for review and approval at least 30 days prior to the test may result in the Canton Local Air Agency's refusal to accept the results of the emission test(s).

- g. Personnel from the Canton LAA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
- h. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the test(s) and submitted to the Canton LAA within 30 days following completion of the test(s).
- i. In place of PM testing, the permittee may elect to install, calibrate, maintain, and operate a CEMS for monitoring PM emissions discharged to the atmosphere and record the output of the system. If the permittee elects to continuously monitor PM emissions instead of conducting performance testing, the permittee shall install, calibrate, maintain, and operate a CEMS and shall comply with the requirements specified in paragraphs (c)(1) through (c)(13) of 40 CFR part 60.45c.

F. Miscellaneous Requirements

1. The US EPA and Ohio EPA have established Modeling Standards and Significant Emission Rates for criteria pollutants. The emission rates in this permit to install for emissions unit B001 were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application in accordance with current guidance. Using data from the permit to install application, an allowable annual emission rate was calculated and compared to the Ohio Modeling Significant emission rate provided in existing guidance. NOx was the only criteria pollutant emitted at levels over the significant emission rate. Therefore, modeling was performed for NOx using the SCREEN 3.0 model or other Ohio EPA approved model. The modeling was conducted using allowable stack emission rates, in gram/second, which were credited with emissions from the shutdown of existing boiler emission units. The modeling results were compared to the Ohio Acceptable Incremental Impact concentrations, in ug/cubic meter. Ohio's Acceptable Incremental Impact for NOx is 12.5 ug/cubic meter. The modeled value was 34.4 ug/cubic meter. The model was conducted again however with at an exhaust temperature of 300 degree F vs. 200 degree F, a 100 foot stack height vs. a 50 foot stack height, and a 60 inch stack diameter vs. a 64 inch stack diameter. Operation of this emissions unit at these new design and operational levels was modeled again. The modeled impact was 10.5 ug/cubic meter which is below the Ohio's Acceptable Incremental Impact for NOx of 12.5 ug/cubic meter.