



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL MODIFICATION  
PIKE COUNTY**

**CERTIFIED MAIL**

Street Address:

50 West Town Street, Suite 700

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049

**Application No: 06-06708**

**Fac ID: 0666000050**

**DATE: 1/15/2008**

Portsmouth Gaseous Diffusion Plant/Becht  
Gilbert Drexel  
PO Box 900  
Piketon, OH 45661

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

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

SEDO



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Permit To Install  
Terms and Conditions

Issue Date: 1/15/2008  
Effective Date: 1/15/2008

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## FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 06-06708

Application Number: 06-06708  
Facility ID: 0666000050  
Permit Fee: **\$400**  
Name of Facility: Portsmouth Gaseous Diffusion Plant/Becht  
Person to Contact: Gilbert Drexel  
Address: PO Box 900  
Piketon, OH 45661

Location of proposed air contaminant source(s) [emissions unit(s)]:

**3930 US Rt 23 S  
Piketon, Ohio**

Description of proposed emissions unit(s):

**Administrative Modification to transfer operational ownership of two natural gas/fuel oil boilers to United States Enrichment Corp. Premise No. 0666000000.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Chris Korleski  
Director

## Part I - GENERAL TERMS AND CONDITIONS

### A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

#### 1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to

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**PTI Application: 06-06708**  
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the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

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

## **2. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **3. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

#### 4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

#### 5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

#### 6. General Requirements

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

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**7. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**8. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

**9. Compliance Requirements**

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
  - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

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- iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

#### **10. Permit-To-Operate Application**

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

#### **11. Best Available Technology**

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

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**12. 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.

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

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

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

### **1. Compliance Requirements**

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

### **2. Reporting Requirements**

The permittee shall submit required reports in the following manner:

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

### **3. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder.

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The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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**4. Authorization To Install or Modify**

If applicable, authorization to install or modify any new or existing emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

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

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

**6. Public Disclosure**

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

**7. Applicability**

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

**8. Construction Compliance Certification**

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

**9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**C. Permit-To-Install Summary of Allowable Emissions**

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
NOx	70.8
SO2	14.5
CO	59.7
VOC	3.9
PM	6.0

This is an Administrative Modification of PTI 06-06708 to give operational control of two boilers to United States Enrichment Corp. (premise id: 0666000000) from DOE (premise id: 0666000050). In issuing this Ad-Mod the premise number will have to be changed, the contact info will need to be changed to: United States Enrichment Corp.

Robert Blythe  
 3930 U.S. Route 23 South  
 Piketon, OH 45661-0628

The emission unit id's will need to be changed from B007 and B008 to B044 and B045. The original

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**Facility ID: 066600005**

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PTI contained two storage tanks whose emission units id's were revoked by Directors findings and Orders and should be left out of this action. In PTI's 2000, the Ad-Mod is listed under DOE's premise number. This Ad-Mod was developed based on guidance received from Mike Ahern.

**Additional comments:** None.

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**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
B044- 81.1 mmBtu per hour Natural Gas and number 2, low sulfur fuel oil fired boiler."Modified" (Terms in this permit supersede those identified in PTI # 06 06708 issued March 25, 2003)	<p>OAC rule 3745-31-05(A)(3)</p> <p>OAC rule 3745-17-10(B)(1)</p> <p>OAC rule 3745-17-07(A)</p> <p>OAC rule 3745-17-07(A)</p> <p>OAC rule 3745-35-07(B)</p>

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	Applicable Emissions <u>Limitations/Control Measures</u>	
40 CFR 60, Subpart Dc	<p>Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed: 0.20 lb/MmBtu actual heat input from low sulfur fuel oil; 0.035 lb/MmBtu actual heat input from natural gas; and 16.2 lbs/hr.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed: 0.051 lb/MmBtu actual heat input from low sulfur fuel oil; and 4.14 lbs/hr.</p> <p>Carbon monoxide (CO) emissions shall not exceed: 0.082 lb/MmBtu actual heat input from natural gas; 0.04 lb/MmBtu actual heat input from low sulfur fuel oil; and 6.7 lbs/hr.</p>	<p>requirements of 3745-17-10(B)(1), OAC rule 3745-17-07(A), OAC 3745-31-05(D), and 40 CFR 60, Subpart Dc.</p> <p>Particulate emissions shall not exceed 0.020 lb mmBtu actual heat input.</p> <p>The visible particulate emission limitation specified in OAC rule 3745-17-07(A)(1) is less stringent than the visible emission limitation specified in 40 CFR, Part 60, Subpart Dc while operating on number 2 low sulfur fuel oil.</p> <p>Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule while operating on natural gas.</p> <p>B044 and B045 together shall not consume more than 4,000,000 gallons of number 2 low sulfur fuel oil, based upon a rolling, 12-month summation.</p>
OAC rule 3745-18-06(A)	<p>Volatile Organic Compounds (VOC) emissions shall not exceed 0.01 lb/MmBtu actual heat input from low sulfur fuel oil; and 0.8 lb/hr.</p> <p>Particulate emissions(PE) emissions shall not exceed 1.62 lbs/hr.</p> <p>The requirements of this rule also include compliance with the</p>	<p>Emissions from the use of both natural gas and low sulfur fuel oil, in emissions units B044 and B045 together, shall not exceed the following:</p> <p>Sulfur dioxide (SO<sub>2</sub>) shall not exceed 14.5 tons per rolling 12-month period;</p> <p>Nitrogen oxide (NO<sub>x</sub>) shall not exceed 70.8 tons per rolling 12-month period;</p>

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Carbon monoxide (CO) shall not exceed 59.7 tons per rolling 12-month period;

Volatile organic compounds (VOC) shall not exceed 4.5 tons per rolling 12-month period; and

Particulate emissions (PE) shall not exceed 6.0 tons per rolling 12-month period.

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity; and the SO<sub>2</sub> emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) while operating on number 2 low sulfur fuel oil.

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

## 2. Additional Terms and Conditions

### 2.a None

## II. Operational Restrictions

1. The total maximum low sulfur, No. 2 fuel oil usage of emissions units B044 and B045 combined shall not exceed 4,000,000 gallons, based upon a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months following the startup of this emissions unit the permittee shall not exceed the monthly fuel oil usage restrictions specified in the following table:

Month	Cumulative fuel oil usage for B044 and B045
1	1,000,000
1-2	2,000,000
1-3	3,000,000
1-4 through 12	4,000,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual fuel oil usage limitation for B044 and B045 shall be based on a rolling, 12-month summation of fuel oil usage.

2. The sulfur content of fuel oil burned in this emissions unit shall not exceed 0.05 percent by weight. The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in Section A.I above.

## III. Monitoring and/or Record keeping Requirements

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur

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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 and D4294), or equivalent methods as approved by the Director.

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, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

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## 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)).

2. The permittee shall maintain daily records of the total quantity of the low sulfur, No. 2 fuel oil (in gallons) and/or natural gas (in millions of cubic feet) combusted in this emissions unit.
3. The permittee shall record and maintain records of the amount of fuel oil combusted each month, and the cumulative amount from preceding months as follows:
  - a. During the first 12 calendar months of operation, following issuance of this permit, the permittee shall record the cumulative gallons of fuel oil combusted for each calendar month; and
  - b. Beginning after the first 12 calendar months of operation, following issuance of this permit, the permittee shall record the rolling, 12-month summation of fuel oil combusted.
4. For any day during which the permittee burns a fuel other than natural gas and/or low sulfur (0.05%), No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify any record which shows that the sulfur content of the fuel oil exceeded 0.05 percent by weight, or identification of any day in which a fuel other than natural gas and/or the low sulfur (0.05%), No.2 fuel oil was burned. The quarterly deviation reports shall be

Emissions Unit ID: **B044**

submitted in accordance with the reporting requirements specified in Part I, Section B.2.b of the General Term and Conditions.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month fuel oil usage limitation, and for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative fuel oil usage levels specified in Section A.II.1. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.
3. This emissions unit is subject to the applicable provisions of Subpart Dc of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.
  - a. Pursuant to 40 CFR Part 60.7, the permittee is hereby advised of the requirement to report the following at the appropriate times:
    - i. Construction date (no later than 30 days after such date);
    - ii. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
    - iii. Actual start-up date (within 15 days after such date); and,
    - iv. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Permit Management Unit  
P. O. Box 163669  
Columbus, Ohio 43216-3669

and

Ohio Environmental Protection Agency  
Southeast District Office  
Division of Air Pollution Control  
2195 Front Street  
Logan, Ohio 43138

- b. Pursuant to 40 CFR Part 60.48c(d) & (e), the permittee shall submit quarterly reports to the Ohio EPA Southeast District Office, which includes the following

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information:

- i. Calendar dates covered in the reporting period;
- ii. The name of the oil supplier(s);
- iii. A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in Section 60.41c, or records of the fuel supplier(s) certification(s) of the sulfur content for each shipment of oil received during the reporting period; and
- iv. A certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

These quarterly reports shall be postmarked by the 30th day following the end of the reporting quarter of each year, and shall cover the fuel oil shipments received during the previous calendar quarters.

**V. Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
  - a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit.
  - b. The emission testing shall be conducted to demonstrate compliance with the lb/mmBtu limitations for NO<sub>x</sub> and CO from the combustion of low sulfur, No. 2 fuel oil, and for NO<sub>x</sub> and CO from the combustion of natural gas.
  - c. The following test method(s) shall be employed to demonstrate compliance with the above emissions limitations:

Methods 1 through 4 from 40 CFR Part 60, Appendix A for velocity traverses, velocity and volumetric flow rates, gas analysis, and moisture content  
Method 7E from 40 CFR Part 60, Appendix A for NO<sub>x</sub>;  
Method 10 from 40 CFR Part 60, Appendix A for CO; and  
Alternative U.S. EPA approved test methods may be used with prior approval

from the Ohio EPA.

- d. The testing shall be conducted while the emissions unit is operating at or near its maximum capacity , unless otherwise specified or approved by the Ohio EPA, Southeast District Office.
  - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southeast District Office refusal to accept the results of the emission test(s).
  - f. Personnel from the Ohio EPA, Southeast District Office 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.
  - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.
2. Compliance with the short term emission limitations contained in this permit shall be determined in accordance with the following methods:
- a. Emission Limitation:

NO<sub>x</sub> emissions shall not exceed 0.20 lb/MMBTU from low sulfur, No. 2 fuel oil  
 NO<sub>x</sub> emissions shall not exceed 0.035 lb/MMBTU from natural gas

Applicable Compliance Method:

Compliance with the allowable pounds of NO<sub>x</sub>/MMBTU shall be demonstrated through the performance testing, as described in Section V.1, above. Until testing is completed, compliance shall be demonstrated by using the documented, manufacturer supplied, performance data for NO<sub>x</sub> emissions of 0.20 lb/MmBtu for low sulfur, No. 2 fuel oil and 0.035 lb/MmBtu for natural gas.
  - b. Emission Limitation:

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NO<sub>x</sub> emissions shall not exceed 16.2 lbs/hr

Applicable Compliance Method:

Compliance shall be demonstrated by the testing requirements in Section V.1 above; and for continued compliance, the emission factor (in lb/MmBtu), derived from the most recent performance test, shall be multiplied by the maximum hourly heat input capacity of the boiler (81.1 MmBtu/hr). Until testing is completed, the manufacture's documented emission factors, of 0.20 lb NO<sub>x</sub>/MmBtu for low sulfur, No. 2 fuel oil, and 0.035 lb NO<sub>x</sub>/MmBtu for natural gas, shall be multiplied by the maximum hourly heat input capacity of the boiler (81.1 MmBtu/hr) to demonstrate compliance.

c. Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 0.051 lb/MmBtu from low sulfur, No. 2 fuel oil

Applicable Compliance Method:

When burning low sulfur, No. 2 fuel oil, compliance shall be demonstrated by the monitoring and record keeping requirements in this permit, and fuel testing requirements and certification for each shipment of low sulfur, No. 2 fuel oil. The sulfur dioxide emission rate (in lbs/MmBtu) shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

d. Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 4.14 lbs/hr

Applicable Compliance Method:

When burning low sulfur, No. 2 fuel oil compliance shall be demonstrated by multiplying the sulfur dioxide emission rate, calculated in accordance with the formula specified in OAC rule 3745-18-04(F) (lbs/MmBtu), by the maximum hourly heat input capacity of the boiler (81.1 MmBtu/hr).

When burning natural gas, compliance shall be based upon multiplying the maximum hourly gas burning capacity of the emissions unit (81,100 cu. ft/hr) by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors",

Emissions Unit ID: **B044**

Table 1.4-2 (7/98) for sulfur dioxide in natural gas combustion (0.6 lbs/mm cu. ft)

e. Emission Limitation:

CO emissions shall not exceed 0.082 lb/MmBtu from natural gas

CO emissions shall not exceed 0.04 lb/MmBtu from low sulfur, No. 2 fuel oil

Applicable Compliance Method:

When burning low sulfur, No. 2 fuel oil, compliance with the allowable pounds of CO/MmBtu shall be demonstrated through the performance testing, as described in Section V.1. Until testing is completed for the low sulfur, No. 2 fuel oil, compliance shall be demonstrated by using the documented, manufacturer supplied, performance data for CO emissions of 0.04 lb/MmBtu for low sulfur, No. 2 fuel oil.

When burning natural gas, compliance with the allowable pounds of CO/MmBtu shall be demonstrated through the performance testing, as described in Section V.1. Until testing is completed for natural gas, compliance shall be based upon multiplying the maximum hourly gas burning capacity of the emissions unit (81,100 cu.ft/hr) by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-1 (7/98) for carbon monoxide in natural gas combustion (84 lbs/mm cu. ft) times the inverse of the maximum hourly heat input capacity of the boiler (1hr/81.1 MmBtu).

f. Emission Limitation:

CO emissions shall not exceed 6.7 lbs/hr

Applicable Compliance Method:

When burning low sulfur, No. 2 fuel oil, compliance shall be demonstrated by the testing requirements in Section V.1 above; and for continued compliance, the emission factor (in lb/MmBtu), derived from the most recent performance test, shall be multiplied by the maximum hourly heat input capacity of the boiler (81.1 MmBtu/hr for low sulfur fuel oil). Until testing is completed for the fuel oil, the manufacture's documented emission factor of 0.04 lb CO/MmBtu for low sulfur, No.2 fuel oil shall be multiplied by the maximum hourly heat input capacity of the boiler (81.1 MmBtu/hr for low sulfur fuel oil) to demonstrate compliance.

When burning natural gas, compliance shall be demonstrated by the testing requirements in Section V.1 above; and for continued compliance, the emission factor (in lb/MmBtu), derived from the most recent performance test, shall be multiplied by the maximum hourly heat input capacity of the boiler (81.1 MmBtu/hr for natural gas). Until testing is completed for the natural gas,

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compliance shall be based upon multiplying the maximum hourly gas burning capacity of the emissions unit (81,100 cu.ft/hr) by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-1 (7/98) for carbon monoxide in natural gas combustion (84 lbs/mm cu. ft)

g. Emission Limitation:

VOC emissions shall not exceed 0.01 lb/MmBtu from low sulfur, No. 2 fuel oil

Applicable Compliance Method:

Compliance shall be demonstrated by using the documented, manufacturer supplied, performance data, for VOC emissions of 0.01 lb/MmBtu for fuel oil and 0.004 lb/MmBtu for natural gas. These emission factors were provided by the manufacturer based on stack testing of identical units.

h. Emission Limitation:

VOC emissions shall not exceed 0.8 lb/hr

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the manufacture's documented emission factors, of 0.01 lb VOC/MmBtu for low sulfur, No. 2 fuel oil and 0.004 lb VOC/MmBtu for natural gas, by the maximum hourly heat input capacity of the boiler (81.1 MmBtu/hr).

i. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/MmBtu actual heat input

When burning low sulfur, No. 2 fuel oil, compliance shall be demonstrated by using the documented, manufacturer supplied, performance data for particulate emissions of 0.02 lb/MmBtu for low sulfur, No. 2 fuel oil.

When burning natural gas, compliance shall be demonstrated by using the documented, manufacturer supplied, performance data, of 0.001 lb particulate/MmBtu for particulate emissions in natural gas combustion. These emission factors were provided by the manufacturer based on stack testing of identical units.

j. Emission Limitation:

Particulate emissions shall not exceed 1.62 lbs PE/hour.

Applicable Compliance Method:

Compliance with this emission limitation when burning low sulfur, No. 2 fuel oil shall be demonstrated by multiplying the maximum hourly heat input capacity of the boiler (81.1 MmBtu/hr) by the manufacturer supplied, performance data emission factor of 0.02 lb particulate/MmBtu for No. 2 fuel oil combustion.

Compliance with this emission limitation when burning natural gas shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (81.1 MmBtu/hr) by the manufacturer supplied, performance data emission factor of 0.001 lb particulate/MmBtu for natural gas combustion.

k. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity while operating on number 2 low sulfur fuel oil.

Applicable Compliance Method:

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

l. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule while operating on natural gas.

Applicable Compliance Method:

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

3. Compliance with the rolling 12-month emission limitations contained in this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

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The SO<sub>2</sub> emissions from B044 and B045 combined shall not exceed 14.5 tons per rolling 12-month period

Applicable Compliance Method:

Compliance with the rolling 12-month emission limit shall be calculated from the fuel usage records maintained in Sections A.III 4 of this permit, for emissions units B044 and B045, and by applying the following calculations to determine the emissions each month:

For fuel oil:  $(0.051 \text{ lb SO}_2/\text{MmBtu}^*) \times (\text{gal/month}) \times (140,000 \text{ Btu/gallon}) \times (\text{ton}/2000 \text{ lbs})$

For natural gas:  $(0.6 \text{ lb SO}_2/\text{MM ft}^3) \times (\text{ft}^3/\text{month}) \times (\text{ton}/2000 \text{ lbs})$

Twelve month rolling emissions, from emissions units B044 and B045, shall be calculated by adding the current monthly emissions, from both units, to the previous 11 months' emission calculations. During the first 12 calendar months of operation, following the issuance of this permit, the monthly, cumulative emissions shall be added through each successive month.

\* this number shall be adjusted with fuel testing results and the calculation required in OAC 3745-18-04(F)

b. Emission Limitation:

The NO<sub>x</sub> emissions from B044 and B045 combined shall not exceed 70.8 tons per rolling 12-month period

Applicable Compliance Method:

Compliance with the rolling 12-month emission limit shall be calculated from the fuel usage records maintained in Sections A.III 4 of this permit, for emissions units B044 and B045, and by applying the following calculations to determine the emissions each month:

For fuel oil:  $(0.20 \text{ lb NO}_x/\text{MmBtu}^*) \times (\text{gal/month}) \times (140,000 \text{ Btu/gallon}) \times (\text{ton}/2000 \text{ lbs})$

For natural gas:  $(0.035 \text{ lb NO}_x/\text{MmBtu}^*) \times (\text{ft}^3/\text{month}) \times (1,000 \text{ Btu/ft}^3) \times (\text{ton}/2000$

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lbs)

Twelve month rolling emissions, from emissions units B044 and B045, shall be calculated by adding the current monthly emissions, from both units, to the previous 11 months' emission calculations. During the first 12 calendar months of operation, following the issuance of this permit, the monthly, cumulative emissions shall be added through each successive month.

\* this number shall be adjusted after the testing required in Section V.1.

c. Emission Limitation:

The CO emissions from B044 and B045 combined shall not exceed 59.7 tons per rolling 12-month period

Applicable Compliance Method:

Compliance with the rolling 12-month emission limit shall be calculated from the fuel usage records maintained in Sections A.III 4 of this permit, for emissions units B044 and B045, and by applying the following calculations to determine the emissions each month:

For fuel oil:  $(0.04 \text{ lb CO/MmBtu}^*) \times (\text{gal/month}) \times (140,000 \text{ Btu/gallon}) \times (\text{ton}/2000 \text{ lbs})$

For natural gas:  $(84 \text{ lbs CO/MM ft}^3) \times (\text{ft}^3/\text{month}) \times (\text{ton}/2000 \text{ lbs})$

Twelve month rolling emissions, from emissions units B044 and B045, shall be calculated by adding the current monthly emissions, from both units, to the previous 11 months' emission calculations. During the first 12 calendar months of operation, following the issuance of this permit, the monthly, cumulative emissions shall be added through each successive month.

\* this number shall be adjusted after the testing required in Section V.1.

d. Emission Limitation:

The VOC emissions from B044 and B045 combined shall not exceed 4.5 tons per rolling 12-month period.

**Portsmouth Gaseous Diffusion Plant/Becht**  
**DTI Application: 06 06708**

**Facility ID: 066600005**

**Emissions Unit ID: B044**

**Modification Issued: 1/15/2008**Applicable Compliance Method:

Compliance with the rolling 12-month emission limit shall be calculated from the fuel usage records maintained in Sections A.III 4 of this permit, for emissions units B044 and B045, and by applying the following calculations to determine the emissions each month:

For fuel oil:  $(0.01 \text{ lb VOC/MmBtu}) \times (\text{gal/month}) \times (140,000 \text{ Btu/gallon}) \times (\text{ton}/2000 \text{ lbs})$

For natural gas:  $(0.004 \text{ lb VOC/MmBtu}) \times (\text{ft}^3/\text{month}) \times (1,000 \text{ Btu/ft}^3) \times (\text{ton}/2000 \text{ lbs})$

Twelve month rolling emissions, from emissions units B044 and B045, shall be calculated by adding the current monthly emissions, from both units, to the previous 11 months' emission calculations. During the first 12 calendar months of operation, following the issuance of this permit, the monthly, cumulative emissions shall be added through each successive month.

e. Emission Limitation:

The particulate emissions from B044 and B045 combined shall not exceed 6.0 tons per rolling 12-month period

Applicable Compliance Method:

Compliance with the rolling 12-month emission limit shall be calculated from the fuel usage records maintained in Sections A.III 4 of this permit, for emissions units B044 and B045, and by applying the following calculations to determine the emissions each month:

For fuel oil:  $(0.02 \text{ lb PE/MmBtu}) \times (\text{gal/month}) \times (140,000 \text{ Btu/gallon}) \times (\text{ton}/2000 \text{ lbs})$

For natural gas:  $(0.001 \text{ lb PE/MmBtu}) \times (\text{ft}^3/\text{month}) \times (1,000 \text{ Btu/ft}^3) \times (\text{ton}/2000 \text{ lbs})$

Twelve month rolling emissions, from emissions units B044 and B045, shall be calculated by adding the current monthly emissions, from both units, to the previous 11 months' emission calculations. During the first 12 calendar months

Emissions Unit ID: **B044**

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of operation, following the issuance of this permit, the monthly, cumulative emissions shall be added through each successive month.

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**VI. Miscellaneous Requirements**

1. The terms and conditions contained in this PTI shall supersede the terms and conditions in PTI 06 06708 issued on March 25, 2003, pertaining to emission units B044 and B045 .

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B044 - 81.1 MmBtu per hour Natural Gas and number 2, low sulfur fuel oil fired boiler. "Modified"	None	None

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

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**Portsmouth Gaseous Diffusion Plant/Becht**  
**DTI Application: 06 06708**

**Facility ID: 066600005**

**Emissions Unit ID: B044**

None

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**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)****A. State and Federally Enforceable Section****I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
B045 - 81.1 MmBtu per hour Natural Gas and number 2 low sulfur fuel oil fired boiler."Modified" (Terms in this permit supersede those identified in PTI # 06 06708 issued March 25, 2003)	<p>OAC rule 3745-31-05(A)(3)</p> <p>OAC rule 3745-17-10(B)(1)</p> <p>OAC rule 3745-17-07(A)</p> <p>OAC rule 3745-17-07(A)</p>

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OAC rule 3745-35-07(B)		<u>Applicable Emissions Limitations/Control Measures</u>
		<p>Nitrogen oxide (NO<sub>x</sub>) emissions shall not exceed:  0.20 lb/MmBtu actual heat input from low sulfur fuel oil;  0.035 lb/MmBtu actual heat input from natural gas; and  16.2 lbs/hr.</p> <p>Sulfur dioxide (SO<sub>2</sub>) emissions shall not exceed:  0.051 lb/MmBtu actual heat input from low sulfur fuel oil; and  4.14 lbs/hr.</p> <p>Carbon monoxide (CO) emissions shall not exceed:  0.082 lb/MmBtu actual heat input from natural gas;  0.04 lb/MmBtu actual heat input from low sulfur fuel oil; and  6.7 lbs/hr.</p>
40 CFR 60, Subpart Dc		<p>Volatile Organic Compounds (VOC) emissions shall not exceed  0.01 lb/MmBtu actual heat input from low sulfur fuel oil; and  0.8 lb/hr.</p> <p>Particulate emissions(PE) emissions shall not exceed 1.62 lbs/hr.</p>
OAC rule 3745-18-06(A)		<p>The requirements of this rule also include compliance with the requirements of 3745-17-10(B)(1), OAC rule 3745-17-07(A), OAC</p>

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3745-31-05(D), and 40 CFR 60, Subpart Dc.

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

The visible particulate emission limitation specified in OAC rule 3745-17-07(A)(1) is less stringent than the visible emission limitation specified in 40 CFR, Part 60, Subpart Dc while operating on number 2 low sulfur fuel oil.

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule while operating on natural gas.

B044 and B045 together shall not consume more than 4,000,000 gallons of number 2 low sulfur fuel oil, based upon a rolling, 12-month summation.

Emissions from the use of both natural gas and low sulfur fuel oil, in emissions units B044 and B045 together, shall not exceed the following:

Sulfur dioxide (SO<sub>2</sub>) shall not exceed  
14.5 tons per rolling 12-month period;

Nitrogen oxide (NO<sub>x</sub>) shall not exceed  
70.8 tons per rolling 12-month period;

Carbon monoxide (CO) shall not exceed  
59.7 tons per rolling 12-month period;

Volatile organic compounds (VOC) shall not exceed 4.5 tons per rolling 12-month period; and

Particulate emissions (PE) shall not exceed 6.0 tons per rolling 12-month period.

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity; and the SO<sub>2</sub> emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3) while operating on number 2 low sulfur fuel oil.

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

**Modification Issued: 1/15/2008****2. Additional Terms and Conditions****2.a** None**II. Operational Restrictions**

1. The total maximum low sulfur, No. 2 fuel oil usage of emissions units B044 and B045 combined shall not exceed 4,000,000 gallons, based upon a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months following the startup of this emissions unit the permittee shall not exceed the monthly fuel oil usage restrictions specified in the following table:

Month	Cumulative fuel oil usage for B044 and B045
1	1,000,000
1-2	2,000,000
1-3	3,000,000
1-4 through 12	4,000,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual fuel oil usage limitation for B044 and B045 shall be based on a rolling, 12-month summation of fuel oil usage.

2. The sulfur content of fuel oil burned in this emissions unit shall not exceed 0.05 percent by weight. The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in Section A.I above.

**III. Monitoring and/or Record keeping Requirements**

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be

Emissions Unit ID: **B045**

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.

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 and D4294), or equivalent methods as approved by the Director.

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, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

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## 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)).

2. The permittee shall maintain daily records of the total quantity of the low sulfur, No. 2 fuel oil (in gallons) and/or natural gas (in millions of cubic feet) combusted in this emissions unit.
3. The permittee shall record and maintain records of the amount of fuel oil combusted each month, and the cumulative amount from preceding months as follows:
  - a. During the first 12 calendar months of operation, following issuance of this permit, the permittee shall record the cumulative gallons of fuel oil combusted for each calendar month; and
  - b. Beginning after the first 12 calendar months of operation, following issuance of this permit, the permittee shall record the rolling, 12-month summation of fuel oil combusted.
4. For any day during which the permittee burns a fuel other than natural gas and/or low sulfur (0.05%), No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

**IV. Reporting Requirements**

1. The permittee shall submit quarterly deviation (excursion) reports that identify any record which shows that the sulfur content of the fuel oil exceeded 0.05 percent by weight, or identification of any day in which a fuel other than natural gas and/or the low sulfur (0.05%), No.2 fuel oil was burned. The quarterly deviation reports shall be

Emissions Unit ID: **B045**

submitted in accordance with the reporting requirements specified in Part I, Section B.2.b of the General Term and Conditions.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month fuel oil usage limitation, and for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative fuel oil usage levels specified in Section A.II.1. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I, Section A.1.c.ii of the General Term and Conditions.
3. This emissions unit is subject to the applicable provisions of Subpart Dc of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.
  - a. Pursuant to 40 CFR Part 60.7, the permittee is hereby advised of the requirement to report the following at the appropriate times:
    - i. Construction date (no later than 30 days after such date);
    - ii. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
    - iii. Actual start-up date (within 15 days after such date); and,
    - iv. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency  
DAPC - Permit Management Unit  
P. O. Box 163669  
Columbus, Ohio 43216-3669

and

Ohio Environmental Protection Agency  
Southeast District Office  
Division of Air Pollution Control  
2195 Front Street  
Logan, Ohio 43138

- b. Pursuant to 40 CFR Part 60.48c(d) & (e), the permittee shall submit quarterly reports to the Ohio EPA Southeast District Office, which includes the following

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information:

- i. Calendar dates covered in the reporting period;
- ii. The name of the oil supplier(s);
- iii. A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in Section 60.41c, or records of the fuel supplier(s) certification(s) of the sulfur content for each shipment of oil received during the reporting period; and
- iv. A certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.

These quarterly reports shall be postmarked by the 30th day following the end of the reporting quarter of each year, and shall cover the fuel oil shipments received during the previous calendar quarters.

**V. Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing in accordance with the following requirements:
  - a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit.
  - b. The emission testing shall be conducted to demonstrate compliance with the lb/MmBtu limitations for NO<sub>x</sub> and CO from the combustion of low sulfur, No. 2 fuel oil, and for NO<sub>x</sub> and CO from the combustion of natural gas.
  - c. The following test method(s) shall be employed to demonstrate compliance with the above emissions limitations:

Methods 1 through 4 from 40 CFR Part 60, Appendix A for velocity traverses, velocity and volumetric flow rates, gas analysis, and moisture content  
Method 7E from 40 CFR Part 60, Appendix A for NO<sub>x</sub>;  
Method 10 from 40 CFR Part 60, Appendix A for CO; and  
Alternative U.S. EPA approved test methods may be used with prior approval

from the Ohio EPA.

- d. The testing shall be conducted while the emissions unit is operating at or near its maximum capacity , unless otherwise specified or approved by the Ohio EPA, Southeast District Office.
  - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Southeast District Office refusal to accept the results of the emission test(s).
  - f. Personnel from the Ohio EPA, Southeast District Office 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.
  - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southeast District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.
2. Compliance with the short term emission limitations contained in this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

NO<sub>x</sub> emissions shall not exceed 0.20 lb/MmBtu from low sulfur, No. 2 fuel oil  
 NO<sub>x</sub> emissions shall not exceed 0.035 lb/MmBtu from natural gas

Applicable Compliance Method:

Compliance with the allowable pounds of NO<sub>x</sub>/MmBtu shall be demonstrated through the performance testing, as described in Section V.1, above. Until testing is completed, compliance shall be demonstrated by using the documented, manufacturer supplied, performance data for NO<sub>x</sub> emissions of 0.20 lb/MmBtu for low sulfur, No. 2 fuel oil and 0.035 lb/MmBtu for natural gas.

b. Emission Limitation:

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NO<sub>x</sub> emissions shall not exceed 16.2 lbs/hr

Applicable Compliance Method:

Compliance shall be demonstrated by the testing requirements in Section V.1 above; and for continued compliance, the emission factor (in lb/MmBtu), derived from the most recent performance test, shall be multiplied by the maximum hourly heat input capacity of the boiler (81.1 MmBtu/hr). Until testing is completed, the manufacture's documented emission factors, of 0.20 lb NO<sub>x</sub>/MmBtu for low sulfur, No. 2 fuel oil, and 0.035 lb NO<sub>x</sub>/MmBtu for natural gas, shall be multiplied by the maximum hourly heat input capacity of the boiler (81.1 MmBtu/hr) to demonstrate compliance.

c. Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 0.051 lb/MmBtu from low sulfur, No. 2 fuel oil

Applicable Compliance Method:

When burning low sulfur, No. 2 fuel oil, compliance shall be demonstrated by the monitoring and record keeping requirements in this permit, and fuel testing requirements and certification for each shipment of low sulfur, No. 2 fuel oil. The sulfur dioxide emission rate (in lbs/MmBtu) shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

d. Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 4.14 lb/hr

Applicable Compliance Method:

When burning low sulfur, No. 2 fuel oil compliance shall be demonstrated by multiplying the sulfur dioxide emission rate, calculated in accordance with the formula specified in OAC rule 3745-18-04(F) (lbs/MmBtu), by the maximum hourly heat input capacity of the boiler (81.1 MmBtu/hr).

When burning natural gas, compliance shall be based upon multiplying the maximum hourly gas burning capacity of the emissions unit (81,100 cu.ft/hr) by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors",

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Table 1.4-2 (7/98) for sulfur dioxide in natural gas combustion (0.6 lbs/mm cu. ft)

e. Emission Limitation:

CO emissions shall not exceed 0.082 lb/MmBtu from natural gas

CO emissions shall not exceed 0.04 lb/MmBtu from low sulfur, No. 2 fuel oil

Applicable Compliance Method:

When burning low sulfur, No. 2 fuel oil, compliance with the allowable pounds of CO/MmBtu shall be demonstrated through the performance testing, as described in Section V.1. Until testing is completed for the low sulfur, No. 2 fuel oil, compliance shall be demonstrated by using the documented, manufacturer supplied, performance data for CO emissions of 0.04 lb/MmBtu for low sulfur, No. 2 fuel oil.

When burning natural gas, compliance with the allowable pounds of CO/MmBtu shall be demonstrated through the performance testing, as described in Section V.1. Until testing is completed for natural gas, compliance shall be based upon multiplying the maximum hourly gas burning capacity of the emissions unit (81,100 cu.ft/hr) by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-1 (7/98) for carbon monoxide in natural gas combustion (84 lbs/mm cu. ft) times the inverse of the maximum hourly heat input capacity of the boiler (1hr/81.1 MmBtu).

f. Emission Limitation:

CO emissions shall not exceed 6.7 lbs/hr

Applicable Compliance Method:

When burning low sulfur, No. 2 fuel oil, compliance shall be demonstrated by the testing requirements in Section V.1 above; and for continued compliance, the emission factor (in lb/MmBtu), derived from the most recent performance test, shall be multiplied by the maximum hourly heat input capacity of the boiler (81.1 MmBtu/hr for low sulfur fuel oil). Until testing is completed for the fuel oil, the manufacture's documented emission factor of 0.04 lb CO/MmBtu for low sulfur, No.2 fuel oil shall be multiplied by the maximum hourly heat input capacity of the boiler (81.1 MmBtu/hr for low sulfur fuel oil) to demonstrate compliance.

When burning natural gas, compliance shall be demonstrated by the testing requirements in Section V.1 above; and for continued compliance, the emission factor (in lb/MmBtu), derived from the most recent performance test, shall be multiplied by the maximum hourly heat input capacity of the boiler (81.1 MmBtu/hr for natural gas). Until testing is completed for the natural gas,

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compliance shall be based upon multiplying the maximum hourly gas burning capacity of the emissions unit (81,100 cu.ft/hr) by the emission factor from AP-42 "Compilation of Air Pollutant Emission Factors", Table 1.4-1 (7/98) for carbon monoxide in natural gas combustion (84 lbs/mm cu. ft).

g. Emission Limitation:

VOC emissions shall not exceed 0.01 lb/MmBtu from low sulfur, No. 2 fuel oil

Applicable Compliance Method:

Compliance shall be demonstrated by using the documented, manufacturer supplied, performance data, for VOC emissions of 0.01 lb/MmBtu for fuel oil and 0.004 lb/MmBtu for natural gas. These emission factors were provided by the manufacturer based on stack testing of identical units.

h. Emission Limitation:

VOC emissions shall not exceed 0.8 lb/hr

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the manufacture's documented emission factors, of 0.01 lb VOC/MmBtu for low sulfur, No. 2 fuel oil and 0.004 lb VOC/MmBtu for natural gas, by the maximum hourly heat input capacity of the boiler (81.1 MmBtu/hr).

i. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/MmBtu actual heat input

When burning low sulfur, No. 2 fuel oil, compliance shall be demonstrated by using the documented, manufacturer supplied, performance data for particulate emissions of 0.02 lb/MmBtu for low sulfur, No. 2 fuel oil.

When burning natural gas, compliance shall be demonstrated by using the documented, manufacturer supplied, performance data, of 0.001 lb particulate/MmBtu for particulate emissions in natural gas combustion. These emission factors were provided by the manufacturer based on stack testing of identical units.

j. Emission Limitation:

Particulate emissions shall not exceed 1.62 lbs PE/hour.

Applicable Compliance Method:

Compliance with this emission limitation when burning low sulfur, No. 2 fuel oil shall be demonstrated by multiplying the maximum hourly heat input capacity of the boiler (81.1 MmBtu/hr) by the manufacturer supplied, performance data emission factor of 0.02 lb particulate/MmBtu for No. 2 fuel oil combustion.

Compliance with this emission limitation when burning natural gas shall be demonstrated by multiplying the maximum hourly gas burning capacity of the emissions unit (81.1 MmBtu/hr) by the manufacturer supplied, performance data emission factor of 0.001 lb particulate/MmBtu for natural gas combustion.

k. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity while operating on number 2 low sulfur fuel oil.

Applicable Compliance Method:

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

l. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule while operating on natural gas.

Applicable Compliance Method:

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

3. Compliance with the rolling 12-month emission limitations contained in this permit shall be determined in accordance with the following methods:

a. Emission Limitation:

Emissions Unit ID: **B045**

The SO<sub>2</sub> emissions from B044 and B045 combined shall not exceed 14.5 tons per rolling 12-month period

Applicable Compliance Method:

Compliance with the rolling 12-month emission limit shall be calculated from the fuel usage records maintained in Sections A.III 4 of this permit, for emissions units B044 and B045, and by applying the following calculations to determine the emissions each month:

For fuel oil:  $(0.051 \text{ lb SO}_2/\text{MmBtu}^*) \times (\text{gal/month}) \times (140,000 \text{ Btu/gallon}) \times (\text{ton}/2000 \text{ lbs})$

For natural gas:  $(0.6 \text{ lb SO}_2/\text{MM ft}^3) \times (\text{ft}^3/\text{month}) \times (\text{ton}/2000 \text{ lbs})$

Twelve month rolling emissions, from emissions units B044 and B045, shall be calculated by adding the current monthly emissions, from both units, to the previous 11 months' emission calculations. During the first 12 calendar months of operation, following the issuance of this permit, the monthly, cumulative emissions shall be added through each successive month.

\* this number shall be adjusted with fuel testing results and the calculation required in OAC 3745-18-04(F)

b. Emission Limitation:

The NO<sub>x</sub> emissions from B044 and B045 combined shall not exceed 70.8 tons per rolling 12-month period

Applicable Compliance Method:

Compliance with the rolling 12-month emission limit shall be calculated from the fuel usage records maintained in Sections A.III 4 of this permit, for emissions units B044 and B045, and by applying the following calculations to determine the emissions each month:

For fuel oil:  $(0.20 \text{ lb NO}_x/\text{MmBtu}^*) \times (\text{gal/month}) \times (140,000 \text{ Btu/gallon}) \times (\text{ton}/2000 \text{ lbs})$

For natural gas:  $(0.035 \text{ lb NO}_x/\text{MmBtu}^*) \times (\text{ft}^3/\text{month}) \times (1,000 \text{ Btu/ft}^3) \times (\text{ton}/2000 \text{ lbs})$

Twelve month rolling emissions, from emissions units B044 and B045, shall be calculated by adding the current monthly emissions, from both units, to the previous 11 months' emission calculations. During the first 12 calendar months

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of operation, following the issuance of this permit, the monthly, cumulative emissions shall be added through each successive month.

\* this number shall be adjusted after the testing required in Section V.1.

c. Emission Limitation:

The CO emissions from B044 and B045 combined shall not exceed 59.7 tons per rolling 12-month period

Applicable Compliance Method:

Compliance with the rolling 12-month emission limit shall be calculated from the fuel usage records maintained in Sections A.III 4 of this permit, for emissions units B044 and B045, and by applying the following calculations to determine the emissions each month:

For fuel oil:  $(0.04 \text{ lb CO/MmBtu}^*) \times (\text{gal/month}) \times (140,000 \text{ Btu/gallon}) \times (\text{ton}/2000 \text{ lbs})$

For natural gas:  $(84 \text{ lbs CO/MM ft}^3) \times (\text{ft}^3/\text{month}) \times (\text{ton}/2000 \text{ lbs})$

Twelve month rolling emissions, from emissions units B044 and B045, shall be calculated by adding the current monthly emissions, from both units, to the previous 11 months' emission calculations. During the first 12 calendar months of operation, following the issuance of this permit, the monthly, cumulative emissions shall be added through each successive month.

\* this number shall be adjusted after the testing required in Section V.1.

d. Emission Limitation:

The VOC emissions from B044 and B045 combined shall not exceed 4.5 tons per rolling 12-month period

Emissions Unit ID: **B045**Applicable Compliance Method:

Compliance with the rolling 12-month emission limit shall be calculated from the fuel usage records maintained in Sections A.III 4 of this permit, for emissions units B044 and B045, and by applying the following calculations to determine the emissions each month:

For fuel oil:  $(0.01 \text{ lb VOC/MmBtu}) \times (\text{gal/month}) \times (140,000 \text{ Btu/gallon}) \times (\text{ton}/2000 \text{ lbs})$

For natural gas:  $(0.004 \text{ lb VOC/MmBtu}) \times (\text{ft}^3/\text{month}) \times (1,000 \text{ Btu/ft}^3) \times (\text{ton}/2000 \text{ lbs})$

Twelve month rolling emissions, from emissions units B044 and B045, shall be calculated by adding the current monthly emissions, from both units, to the previous 11 months' emission calculations. During the first 12 calendar months of operation, following the issuance of this permit, the monthly, cumulative emissions shall be added through each successive month.

e. Emission Limitation:

The particulate emissions from B044 and B045 combined shall not exceed 6.0 tons per rolling 12-month period

Applicable Compliance Method:

Compliance with the rolling 12-month emission limit shall be calculated from the fuel usage records maintained in Sections A.III 4 of this permit, for emissions units B044 and B045, and by applying the following calculations to determine the emissions each month:

For fuel oil:  $(0.02 \text{ lb PE/MmBtu}) \times (\text{gal/month}) \times (140,000 \text{ Btu/gallon}) \times (\text{ton}/2000 \text{ lbs})$

For natural gas:  $(0.001 \text{ lb PE/MmBtu}) \times (\text{ft}^3/\text{month}) \times (1,000 \text{ Btu/ft}^3) \times (\text{ton}/2000 \text{ lbs})$

Twelve month rolling emissions, from emissions units B044 and B045, shall be calculated by adding the current monthly emissions, from both units, to the previous 11 months' emission calculations. During the first 12 calendar months of operation, following the issuance of this permit, the monthly, cumulative emissions shall be added through each successive month.

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**VI. Miscellaneous Requirements**

1. The terms and conditions contained in this PTI shall supersede the terms and conditions in PTI 06 06708 issued on March 25, 2003, pertaining to emission units B044 and B045, .

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B045 - 81.1 MmBtu per hour Natural Gas and number 2 low sulfur fuel oil fired boiler."Modified"	None	None

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

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Emissions Unit ID: **B045**

None