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

2/26/2013

Certified Mail

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

Mr. PATRICK SICONOLFI
Riverside Methodist Hospital
ATTN: FACILITIES ENGINEERING
3535 OLENTANGY RIVER RD
COLUMBUS, OH 43214

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

Facility ID: 0125040598
Permit Number: P0082740
Permit Type: Renewal
County: Franklin

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO)for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Columbus Dispatch. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page,www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA-CDO

PUBLIC NOTICE
2/26/2013 Issuance of Draft Air Pollution Permit-To-Install and Operate

Riverside Methodist Hospital
3535 OLENTANGY RIVER RD,
Columbus, OH 43214
Franklin County
FACILITY DESC.: General Medical and Surgical Hospitals
PERMIT #: P0082740
PERMIT TYPE: Renewal
PERMIT DESC: One 40 MMBtu/hr and five 17 MMBtu/hr natural gas/number two fuel oil-fired boilers

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Bryon Marusek, Ohio EPA DAPC, Central District Office, 50 West Town Street, 6th Floor P.O. Box 1049, Columbus, OH 43216-1049. Ph: (614)728-3778

Permit Strategy Write-Up

1. Check all that apply:

   xSynthetic Minor Determination

   Netting Determination

2. Source Description:

   Riverside Methodist Hospital is located at:

   3535 Olentangy River Road
   Columbus, OH 43214

3. Facility Emissions and Attainment Status:

   Riverside Methodist is FEPTIO to avoid Title V. Riverside Methodist is limited to 300,000 gallons of number 2 distillate oil and 1,140 x 10^6 cubic feet of natural gas per rolling, 12-month period.

4. Source Emissions:

   SO2 emissions from emissions units B013, B014, B015, B016, B017, and B018, combined, shall not exceed 10.65 tons per rolling, 12-month period.

   NOx emissions from emissions units B013, B014, B015, B016, B017 and B018, combined, shall not exceed 57.00 tons per rolling, 12-month period.

   CO emissions from emissions units B013, B014, B015, B016, B017 and B018, combined, shall not exceed 47.90 tons per rolling, 12-month period.

   PE emissions from emissions units B013, B014, B015, B016, B017 and B018, combined, shall not exceed 11.63 tons per rolling, 12-month period.

   OC emissions from emissions units B013, B014, B015, B016, B017 and B018, combined, shall not exceed 6.30 tons per rolling, 12-month period.

5. Conclusion:

   B018, due to its installation date is subject to BAT. B013, B014, B015, B016, and B017 are not subject to BAT due to their installation date.

6. Please provide additional notes or comments as necessary:

   None

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

Pollutant	Tons Per Year
SO2	10.65
NOx	57
CO	47.9
PE	11.63
OC	6.3

DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
Riverside Methodist Hospital

Facility ID:	0125040598
Permit Number:	P0082740
Permit Type:	Renewal
Issued:	2/26/2013
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Permit-to-Install and Operate
for
Riverside Methodist Hospital

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Authorization

Facility ID:	0125040598
Application Number(s):	A0013082
Permit Number:	P0082740
Permit Description:	One 40 MMBtu/hr and five 17 MMBtu/hr natural gas/number two fuel oil-fired boilers
Permit Type:	Renewal
Permit Fee:	$0.00*DO NOT send payment at this time, subject to change before final issuance*
Issue Date:	2/26/2013
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date:	To be entered upon final issuance

This document constitutes issuance to:

Riverside Methodist Hospital
3535 OLENTANGY RIVER RD
Columbus, OH 43214

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

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0082740
Permit Description: One 40 MMBtu/hr and five 17 MMBtu/hr natural gas/number two fuel oil-fired boilers

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

Emissions Unit ID:	**B018**
Company Equipment ID:	BOILER NO 6
Superseded Permit Number:	01-6379
General Permit Category and Type:	Not Applicable

Group Name: 17 mmBtu boilers with #2 backup

Emissions Unit ID:	**B013**
Company Equipment ID:	BOILER NO 1
Superseded Permit Number:	01-6379
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**B014**
Company Equipment ID:	BOILER NO 2
Superseded Permit Number:	01-6379
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**B015**
Company Equipment ID:	BOILER NO 3
Superseded Permit Number:	01-6379
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**B016**
Company Equipment ID:	BOILER NO 4
Superseded Permit Number:	01-6379
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**B017**
Company Equipment ID:	BOILER NO 5
Superseded Permit Number:	01-6379
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting[1] a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: http://www.epa.gov/ttn/atw/area/arearules.html.

C. Emissions Unit Terms and Conditions

1. B018, BOILER NO 6

Operations, Property and/or Equipment Description:

40 MMBTU/HR BOILER, NATURAL GAS FIRED WITH FUEL OIL #2 BACKUP

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

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

a. None.

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI No. 01-6379 issued 9/18/96)	Emissions shall not exceed: The particulate emissions (PE) limitation established by this rule is equivalent to the PE limitation established pursuant to OAC rule 3745-17-10(B)(1). 20.40 pounds sulfur dioxide (SO_2) per hour 0.44 pound organic compounds (OC) per hour 5.71 pounds nitrogen oxide (NO_x) per hour 3.30 pounds carbon monoxide (CO) per hour

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D) and OAC rule 3745-17-10(B)(1).
b.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V)	SO_2 emissions from emissions units B013, B014, B015, B016, B017, and B018, combined, shall not exceed 10.65 tons per rolling, 12-month period. NO_x emissions from emissions units B013, B014, B015, B016, B017 and B018, combined, shall not exceed 57.00 tons per rolling, 12-month period. CO emissions from emissions units B013, B014, B015, B016, B017 and B018, combined, shall not exceed 47.90 tons per rolling, 12-month period. PE emissions from emissions units B013, B014, B015, B016, B017 and B018, combined, shall not exceed 11.63 tons per rolling, 12-month period. OC emissions from emissions units B013, B014, B015, B016, B017 and B018, combined, shall not exceed 6.30 tons per rolling, 12-month period. See c)(1), c)(2), and c)(3)
c.	OAC rule 3745-17-07(A)(1)	The opacity limitation specified by this rule is less stringent than the opacity limitation established pursuant to 40 CFR Part 60, Subpart Dc.
d.	OAC rule 3745-17-10(B)(1)	0.020 pound (PE) per million British thermal units (Btu) of actual heat input.
e.	OAC rule 3745-18-31(A)	SO_2 emissions shall not exceed 1.65 pounds per MMBtu.
f.	40 CFR Part 60 Subpart Dc	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for one, six-minute period per hour of not more than twenty-seven percent opacity. See b)(2)a.i., and d)(1)
g.	40 CFR Part 60, Subpart A	See b)(2)b.

(2) Additional Terms and Conditions

a. The quality of the oil burned in this emissions unit shall meet the following specifications on an "as-received" basis:

i. The quality of the number 2 distillate fuel oil burned in this emissions unit shall meet a sulfur content which is equal to or less than 0.5 weight percent sulfur and is sufficient to comply with the allowable sulfur dioxide emission limitations.

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

b. The permittee shall comply with the applicable requirements identified in 40 CFR Part 60, Subpart Dc in accordance with the applicable provisions of 40 CFR Part 60, Subpart A.

c) Operational Restrictions

(1) The combined number 2 distillate fuel oil usage for emissions units B013, B014, B015, B016, B017, and B018 shall not exceed 300,000 gallons per rolling, 12-month period.

(2) The combined natural gas usage for emissions units B013, B014, B015, B016, B017 and B018 shall not exceed 1,140 x 10^6 cubic feet per rolling, 12-month period.

(3) The permittee shall burn only natural gas and/or number two fuel oil in this emissions unit.

(4) The permittee shall comply with the applicable operational restrictions identified in 40 CFR Part 60, Subpart Dc and 40 CFR Part 60, Subpart A.

d) Monitoring and/or Recordkeeping Requirements

(1) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the fuel oil type (number 2), the permittee's or oil supplier's analyses for sulfur 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 content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

(2) The permittee shall maintain monthly records of the following information:

a. the combined fuel oil usage for emissions units B013, B014, B015, B016, B017 and B018;

b. the combined rolling 12-month fuel oil usage for emissions units B013, B014, B015, B016, B017 and B018;

c. the combined natural gas usage for emissions units B013, B014, B015, B016, B017 and B018; and

d. the combined rolling 12-month natural gas usage for emissions units B013, B014, B015, B016, B017 and B018.

The rolling, 12-month emissions of each pollutant are determined by adding the total emissions of each pollutant for each month to the total emissions of each pollutant from the preceding 11 months.

(3) For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(4) The permittee shall comply with the applicable monitoring and recordkeeping requirements identified in 40 CFR Part 60, Subpart Dc and 40 CFR Part 60, Subpart A.

e) Reporting Requirements

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

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. each period of time, (start date and time to end date and time), when the emissions unit burned a fuel other than natural gas and/or number 2 distillate fuel oil;

ii. each period of time, (start date and time to end date and time), when the number 2 distillate fuel oil burned in this emission unit exceeded a sulfur content of 0.5 weight percent sulfur;

iii. any exceedance of the rolling, 12-month distillate fuel oil limitation of 300,000 gallons, combined, for emissions units B013, B014, B015, B016, B017 and B018; and

iv. any exceedance of the rolling, 12-month natural gas limitation of 1,140 x 10^6 cubic feet, combined, for emissions units B013, B014, B015, B016, B017 and B018.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

(4) The permittee shall comply with the applicable reporting requirements identified in 40 CFR Part 60, Subpart Dc and 40 CFR Part 60, Subpart A.

f) Testing Requirements

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

a. <u>Emission Limitation:</u>

0.5% SO_2 content by weight

<u>Applicable Compliance Method:</u>

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

b. <u>Emission Limitation:</u>

Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average, except for one, six-minute period per hour of not more than twenty-seven percent opacity.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with the applicable requirements established in 40 CFR Part 60, Subpart Dc and 40 CFR Part 60, Subpart A.

c. Emission Limitation:

0.020 pound PE per MMBtu of actual heat input

Applicable Compliance Method:

If required, compliance with this PE limitation shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

d. Emission Limitation:

20.40 pounds SO_2 per hour

Applicable Compliance Method:

Compliance with the SO_2 limitation is demonstrated through the use of emissions factors published in AP-42, Volume I, Fifth Edition, Section 1.4 "Natural Gas Combustion", Table 1.4-2 (0.00059 lb/MMcu.ft.) and Section 1.3, "Fuel Oil Combustion", Table 1.3-1 (0.51 lb/MMBtu), respectively.

If required, compliance with these limitations shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 6.

e. Emission Limitation:

5.71 pounds NO_x per hour

Applicable Compliance Method:

Compliance with the NO_x limitation is demonstrated through the use of emissions factors published in AP-42, Volume I, Fifth Edition, Section 1.4 "Natural Gas Combustion", Table 1.4-2 (0.098 lb/MMcu.ft.) and Section 1.3, "Fuel Oil Combustion", Table 1.3-1 (0.143 lb/MMBtu), respectively.

If required, compliance with these limitations shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 7e.

f. Emission Limitation:

3.30 pounds CO per hour

Applicable Compliance Method:

Compliance with the CO limitation is demonstrated through the use of emissions factors published in AP-42, Volume I, Fifth Edition, Section 1.4 "Natural Gas Combustion", Table 1.4-2 (0.082 lb/MMBtu) and Section 1.3, "Fuel Oil Combustion", Table 1.3-1 (0.036 lb/MMBtu), respectively.

If required, compliance with these limitations shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Method 10.

g. Emission Limitation:

0.44 pound OC per hour

Applicable Compliance Method:

Compliance with the OC limitation is demonstrated through the use of emissions factors published in AP-42, Volume I, Fifth Edition, Section 1.4 "Natural Gas Combustion", Table 1.4-2 (0.011 lb/MMBtu) and Section 1.3, "Fuel Oil Combustion", Table 1.3-1 (0.00397 lb/MMBtu), respectively.

If required, compliance with the hourly OC emission limitation shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and Methods 18, 25 or 25A.

h. Emission Limitation:

10.65 tons SO_2 per rolling, 12-month period
57.00 tons NO_x per rolling, 12-month period
47.90 tons CO per rolling, 12-month period
11.63 tons PE per rolling, 12-month period
6.30 tons OC per rolling, 12-month period

Applicable Compliance Method:

Compliance with the rolling, 12-month limitations may be determined by multiplying the actual natural gas usage required in d)(2) by the following emission factors:

Pollutant	Emission Factor
NO_x	100 lbs/MMcu.ft
SO_2	0.6 lbs/MMcu.ft
CO	84 lbs/MMcu.ft
PM	7.6 lbs/MMcu.ft
OC	11 lbs/MMcu.ft

Compliance with the rolling, 12-month limitations may be determined by multiplying the actual distillate oil usage required in d)(2) by the following emission factors:

Pollutant	Emission Factor
NO_x	20 lbs/1000 gallons
SO_2	71 lbs/1000 gallons
CO	5 lbs/1000 gallons
PM	2.0 lbs/1000 gallons
OC	0.556 lb/1000 gallons

i. Emission Limitation:

1.65 pounds SO_2 per MMBtu of actual heat input

Applicable Compliance Method:

The emission rate in pounds of sulfur dioxide per MMBtu actual heat input shall be calculated by the following equation (from OAC rule 3745-18-31(A)(1):

$EL = 8.088Qm^{-0.4307}$

where:

Qm = the total rated heat input capacity in MMBtu per hour

EL = the allowable emission rate in pounds of SO_2 per MMBtu actual heat input

(2) The permittee shall comply with the applicable testing requirements identified in 40 CFR Part 60, Subpart Dc and 40 CFR

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group -17 MMBtu boilers with #2 backup: B013,B014,B015,B016,B017,

EU ID	Operations, Property and/or Equipment Description
B013	17 MMBTU/HR BOILER NATURAL GAS FIRED WITH FUEL OIL #2 BACKUP
B014	17 MMBTU/HR BOILER NATURAL GAS FIRED WITH FUEL OIL #2 BACKUP
B015	17 MMBTU/HR BOILER NATURAL GAS FIRED WITH FUEL OIL #2 BACKUP
B016	17 MMBTU/HR BOILER NATURAL GAS FIRED WITH FUEL OIL #2 BACKUP
B017	17 MMBTU/HR BOILER NATURAL GAS FIRED WITH FUEL OIL #2 BACKUP

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

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

a. None.

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

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

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (Synthetic minor to avoid Title V)	SO_2 emissions from emissions units B013, B014, B015, B016, B017, and B018, combined, shall not exceed 10.65 tons per rolling, 12-month period. NO_x emissions from emissions units B013, B014, B015, B016, B017 and B018, combined, shall not exceed 57.00 tons per rolling, 12-month period. CO emissions from emissions units B013, B014, B015, B016, B017 and B018, combined, shall not exceed 47.90 tons per rolling, 12-month period.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		PE emissions from emissions units B013, B014, B015, B016, B017 and B018, combined, shall not exceed 11.63 tons per rolling, 12-month period. OC emissions from emissions units B013, B014, B015, B016, B017 and B018, combined, shall not exceed 6.30 tons per rolling, 12-month period. See c)(1), c)(2), and c)(3)
b.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack shall not exceed twenty percent opacity, as a six-minute average.
c.	OAC rule 3745-17-10(B)(1)	0.020 pound particulate emissions (PE) per million British thermal units (Btu) of actual heat input
d.	OAC rule 3745-18-31(A)(1)	SO_2 emissions shall not exceed 2.39 pounds per MMBtu.

(2) Additional Terms and Conditions

a. The quality of the oil burned in this emissions unit shall meet the following specifications on an "as-received" basis:

i. The quality of the number 2 distillate fuel oil burned in these emissions units shall meet a sulfur content which is equal to or less than 0.5 weight percent sulfur and is sufficient to comply with the allowable sulfur dioxide emission limitations.

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

c) Operational Restrictions

(1) The combined number 2 distillate fuel oil usage for emissions units B013, B014, B015, B016, B017, and B018 shall not exceed 300,000 gallons per rolling, 12-month period.

(2) The combined natural gas usage for emissions units B013, B014, B015, B016, B017 and B018 shall not exceed 1,140 x 10^6 cubic feet per rolling, 12-month period.

(3) The permittee shall burn only natural gas and/or number two fuel oil in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the fuel oil type (number 2), the permittee's or oil supplier's analyses for sulfur 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 content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

(2) The permittee shall maintain monthly records of the following information:

a. the combined fuel oil usage for emissions units B013, B014, B015, B016, B017 and B018;

b. the combined rolling 12-month fuel oil usage for emissions units B013, B014, B015, B016, B017 and B018;

c. the combined natural gas usage for emissions units B013, B014, B015, B016, B017 and B018; and

d. the combined rolling 12-month natural gas usage for emissions units B013, B014, B015, B016, B017 and B018.

The rolling, 12-month emissions of each pollutant are determined by adding the total emissions of each pollutant for each month to the total emissions of each pollutant from the preceding 11 months.

(3) For each day during which the permittee burns a fuel other than natural gas and/or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

e) Reporting Requirements

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

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit.

The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(3) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. each period of time, (start date and time to end date and time), when the emissions unit burned a fuel other than natural gas and/or number 2 distillate fuel oil;

ii. each period of time, (start date and time to end date and time), when the number 2 distillate fuel oil burned in this emission unit exceeded a sulfur content of 0.5 weight percent sulfur;

iii. any exceedance of the rolling, 12-month distillate fuel oil limitation of 300,000 gallons, combined, for emissions units B013, B014, B015, B016, B017 and B018; and

iv. any exceedance of the rolling, 12-month natural gas limitation of 1,140 x 10^6 cubic feet, combined, for emissions units B013, B014, B015, B016, B017 and B018.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

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

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

f) Testing Requirements

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

a. <u>Emission Limitation:</u>

0.5% SO_2 content by weight

Applicable Compliance Method:

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

b. Emission Limitation:

Visible particulate emissions from the stack(s) serving each boiler shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method:

If required, 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).

c. Emission Limitation:

0.020 pound PE per MMBtu of actual heat input

Applicable Compliance Method:

If required, compliance with this PE limitation shall be demonstrated through emissions testing performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

d. Emission Limitation:

2.39 pounds SO_2 per MMBtu of actual heat input

Applicable Compliance Method:

The emission rate in pounds of sulfur dioxide per MMBtu actual heat input shall be calculated by the following equation (from OAC rule 3745-18-31(A)(1):

$EL = 8.088Qm^{-0.4307}$

where:

Qm = the total rated heat input capacity in MMBtu per hour

EL = the allowable emission rate in pounds of SO_2 per MMBtu actual heat input

e. Emission Limitation:

10.65 tons SO_2 per rolling, 12-month period
57.00 tons NO_x per rolling, 12-month period
47.90 tons CO per rolling, 12-month period
11.63 tons PE per rolling, 12-month period
6.30 tons OC per rolling, 12-month period

Applicable Compliance Method:

Compliance with the rolling, 12-month limitations may be determined by multiplying the actual natural gas usage required in d)(2) by the following emission factors:

Pollutant	Emission Factor
NO_x	100 lbs/MMcu.ft
SO_2	0.6 lbs/MMcu.ft
CO	84 lbs/MMcu.ft
PM	7.6 lbs/MMcu.ft
OC	11 lbs/MMcu.ft

Compliance with the rolling, 12-month limitations may be determined by multiplying the actual distillate oil usage required in d)(2) by the following emission factors:

Pollutant	Emission Factor
NO_x	20 lbs/1000 gallons
SO_2	71 lbs/1000 gallons
CO	5 lbs/1000 gallons
PM	2.0 lbs/1000 gallons
OC	0.556 lb/1000 gallons

g) Miscellaneous Requirements

(1) None.