

**☒ Synthetic Minor Determination and/or ☐ Netting Determination**  
**Permit To Install 13-03817**

A. Source Description

The Cleveland Clinic Foundation has submitted Permits to Install for (2) natural gas/(No.2 fuel oil alternate) boilers rated at 171.3 and 173.2 mmBtu/hr.

B. Facility Emissions and Attainment Status

This facility has Title V and PSD status due to the facility having the potential to emit CO, SO<sub>2</sub> and NO<sub>x</sub> emissions in excess of 100 and 250 TPY. Cuyahoga County is designated as attainment for CO, NO<sub>x</sub> and non-attainment for SO<sub>2</sub>.

C. Source Emissions

These sources have the potential to emit (PTE) more than 100 and 250 tons of SO<sub>2</sub> (340) and NO<sub>x</sub> (216) per year when burning No.2 fuel oil and more than 100 and 250 tons of NO<sub>x</sub> (253) and CO(120) per year when burning natural gas resulting in Title V and PSD applicability. However, the company has requested a Federal Enforceable Permit to Install (Syn Minor) in order to avoid Title V and PSD permitting. The allowable will be 0.37 TPY of SO<sub>2</sub>, 0.24 TPY of NO<sub>x</sub> and 0.06 TPY of CO when burning No.2 fuel oil and 0.23 TPY SO<sub>2</sub>, 69.1 TPY of NO<sub>x</sub> and 32.8 TPY of CO when burning natural gas. Total combined allowable emissions will be limited to 0.6 TPY SO<sub>2</sub>, 69.34 TPY NO<sub>x</sub> and 32.86 TPY CO. All other pollutants have PTE's below PSD trigger levels.

D. Conclusion

Limiting the No.2 fuel oil usage rate for boilers B005 and B006 (24,000 gallons/yr based on a 12-month rolling summation) will limit the SO<sub>2</sub> and NO<sub>x</sub> emissions to 0.37 and 0.34 TPY. Also, limiting the natural gas usage of boilers B005 and B006 when burning natural gas (783 mmcuf/yr based on a 12-month rolling summation) will limit the NO<sub>x</sub> and CO emissions to 69.1 and 32.8 TPY. Therefore, Cleveland Clinic Foundation will not be subject to Title V or PSD permitting.



State of Ohio Environmental Protection Agency

Street Address:

Lazarus Gov. Center  
122 S. Front Street  
Columbus, OH 43215

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

Mailing Address:

Lazarus Gov. Center  
P.O. Box 1049  
Columbus, OH 43216-1049

**RE: DRAFT PERMIT TO INSTALL  
CUYAHOGA COUNTY  
Application No: 13-03817**

**CERTIFIED MAIL**

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

**DATE:** 10/16/2001

Cleveland Clinic Foundation  
Roger Olsafsky  
9500 Euclid Avenue  
Cleveland, OH 44195

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$1600** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo  
Field Operations and Permit Section  
Division of Air Pollution Control



**Permit To Install  
Terms and Conditions**

**Issue Date: To be entered upon final issuance  
Effective Date: To be entered upon final issuance**

**DRAFT PERMIT TO INSTALL 13-03817**

Application Number: 13-03817

APS Premise Number: 1318004311

Permit Fee: **To be entered upon final issuance**

Name of Facility: Cleveland Clinic Foundation

Person to Contact: Roger Olsafsky

Address: 9500 Euclid Avenue  
Cleveland, OH 44195

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

**9500 Euclid Avenue  
Cleveland, Ohio**

Description of proposed emissions unit(s):

**RR Boiler 5 and RR Boiler 4 -- B005 and B006.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

## 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 the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.10 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 to the appropriate Ohio EPA District Office or local air agency every six months, i.e., 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. 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.

## **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 reissuance, or modification, or for denial of a permit renewal application.
- 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, reopened, 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, reopening 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.

## **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 this Permit To Install.

## **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 of 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, the State, and citizens 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.
  - 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 To Install 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 thirty (30) 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.

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

**1. Compliance Requirements**

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

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

**3. Permit Transfers**

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

**4. 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.

**5. Termination of Permit To Install**

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may

be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

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

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

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

**7. 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.

**8. 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).

**9. Construction Compliance Certification**

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

**10. 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., 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**

<b><u>Pollutant</u></b>	<b><u>Tons Per Year</u></b>
<b>PM/PM<sub>10</sub></b>	<b>3.00</b>
<b>NO<sub>x</sub></b>	<b>69.34</b>
<b>SO<sub>2</sub></b>	<b>0.60</b>
<b>CO</b>	<b>32.86</b>
<b>VOC</b>	<b>2.15</b>

**The above totals include emissions resulting from firing both fuels, no. 2 fuel oil and natural gas.**

**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

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B005 - 171.3 mmBtu/hr natural gas/(no.2 oil alternate) fired boiler	OAC rule 3745-31-05(A)(3)	From burning natural gas 29.1 lbs/hr NOx emissions 13.8 lbs/hr CO emissions 0.91 lb/hr VOC emissions 0.10 lb/hr SO2 emissions 1.25 lbs/hr of PM/PM10 emissions See A.I.2a.
		From burning No.2 fuel oil 24.7 lbs/hr NOx emissions 6.18 lbs/hr CO emissions 2.47 lbs/hr of PM/PM10 emissions 38.8 lbs/hr SO2 emissions See A.I.2b.
		The requirements established pursuant to this rule also include the requirements of OAC rules 3745-17-07(A).
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule from the stack
	OAC rule 3745-17-10(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-18-06(D)	The emission limitation specified by this rule is less stringent than the

OAC rule 3745- 31-05(D)  
Synthetic Minor to avoid Title V and  
PSD

emission limitation established pursuant to rule OAC 3745-31-05(A)(3).

The combined annual emissions resulting from the operation of emission units B005 and B006 shall not exceed the following limits:

When firing natural gas:

69.1 TPY NO<sub>x</sub> as a 12-month rolling summation

32.8 TPY CO as a 12-month rolling summation

When firing No.2 fuel oil:

0.37 TPY SO<sub>2</sub> as a 12-month rolling summation

0.24 TPY NO<sub>x</sub> as a 12-month rolling summation

## 2. Additional Terms and Conditions

### 2.a When firing natural gas,

The annual emissions resulting from the operation of emissions unit B005 shall not exceed the following limits:

NO<sub>x</sub> 34.5 TPY

CO 16.4 TPY

VOC 1.07 TPY

SO<sub>2</sub> 0.11 TPY

PM/PM<sub>10</sub> 1.49 TPY

### 2.b When firing No.2 fuel oil,

The annual emissions resulting from the operation of emissions unit B005 shall not exceed the following limits:

NO<sub>x</sub> 0.12 TPY

CO 0.03 TPY

SO<sub>2</sub> 0.18 TPY

PM/PM<sub>10</sub> 0.012 TPY

2.c This emissions unit was installed in June 1976. The fuel feed equipment serving it was upgraded in December 1984.

2.d This emissions unit is not currently subject to the requirements specified in 40 CFR Part 60, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units) or 40 CFR Part 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.)

**B. Operational Restrictions**

1. The permittee shall burn only natural gas and/or No.2 fuel oil in this emissions unit.
2. The quality of the oil burned in this emissions unit shall meet the following specifications on an "as received" basis:
  - a. A sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.224 pounds sulfur dioxide/mmBtu actual heat input.

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

3. The maximum annual natural gas usage for emissions units B005 and B006 shall not exceed 783 mmcuft, based upon a rolling, 12-month summation of the natural gas usage rate figures.
4. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the natural gas usage rate for emission units B005-B006 specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Natural Gas Usage in mmcuft</u>
1	65.3
1-2	130.6
1-3	195.9
1-4	261.2
1-5	326.5
1-6	391.8
1-7	457.1
1-8	522.4
1-9	587.7
1-10	653.0
1-11	718.3
1-12	783.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the combined annual natural gas usage limitation for emission units B005 and B006 shall be based upon a rolling, 12-month summation of the natural gas usage figures.

5. The combined maximum annual No.2 fuel oil usage for sources B005 and B006 shall not exceed 24,000 gallons based upon a rolling, 12-month summation of the No. 2 fuel oil usage figures.

6. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the No.2 fuel oil usage rates for B005 and B006 specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative gallons of No.2 fuel oil</u>
1	2,000
1-2	4,000
1-3	6,000
1-4	8,000
1-5	10,000
1-6	12,000
1-7	14,000
1-8	16,000
1-9	18,000
1-10	20,000
1-11	22,000
1-12	24,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual No.2 fuel oil usage limitation for emissions units B005 and B006 shall be based upon a rolling, 12-month summation of the No.2 fuel oil usage figures.

### C. Monitoring and/or Recordkeeping Requirements

- For each day during which the permittee burns a fuel other than natural gas and/or No.2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.
- For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received and the permittee's or oil supplier's analyses for sulfur content and heat content.
- The permittee shall maintain monthly records of the following information for emission units B005 and B006:

- a. the No.2 fuel oil usage rate for each month in gallons.
- b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the No.2 fuel oil usage rates.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative No.2 fuel oil usage rates for each calendar month.

5. The permittee shall maintain monthly records of the following information for emission units B005 and B006:
  - a. the amount of natural gas burned for each month in cu.ft.
  - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of natural gas burned in these emissions units.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative amount of natural gas burned for each calendar month.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or No.2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent by weight) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:
  - a. the total quantity of oil received in each shipment (gallons);
  - b. the weighted\* average sulfur dioxide emission rate (pounds/MMBtu) for the oil received during the calendar month; and
  - c. the weighted\* average heat content (Btu/gallon) of the oil received during the calendar month.

\*In proportion to the quantity of oil received in each shipment during the calendar month. These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the oil shipments received during the previous calendar quarters.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month No.2 fuel oil usage limitation and, for the first 12 calendar months of operation

following the issuance of this permit, all exceedances of the maximum allowable cumulative No.2 fuel oil usage levels.

4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month natural gas usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage levels.
5. **Sulfur Content in Oil Limitation:**  
The permittee shall submit deviation (excursion) reports which identify all exceedances of the sulfur content limitation for oil combusted in this emissions unit.

## **E. Testing Requirements**

1. Emission Limitation -

20% opacity, as a six-minute average

Applicable Compliance Method(s) -

Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1).

2. Emission Limitation -

29.1 lbs/hr of NO<sub>x</sub> emissions and 34.5 TPY when burning natural gas

Applicable Compliance Method -

Compliance with the hourly emission limit shall be determined by multiplying the maximum hourly natural gas usage of each emissions unit (146,952 cu.ft/hr), the heating value for natural gas (1050 Btu/cu.ft) and the emission factor for NO<sub>x</sub> (0.168 lb/mmBtu) established through January 2000 performance testing.

The TPY emission rate shall be determined by multiplying the established emission factor for NO<sub>x</sub> (0.168 lb/mmBtu), the heating value for natural gas (1050 Btu/cu.ft), the annual natural gas usage (in mmcu.ft) for emissions unit B005 and the factor (1.0 ton/2000 lbs).

3. Emission Limitation -

13.8 lbs/hr of CO emissions and 16.4 TPY when burning natural gas

Applicable Compliance Method -

Compliance with the hourly emission limit shall be determined by multiplying the maximum hourly natural gas usage of each emissions unit (164,954 cu.ft/hr) and the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.4 Table 1.4-1(7/98) emission factor for CO (84 lbs CO/million cubic feet).

The TPY emission rate shall be determined by multiplying the AP-42 emission factor for CO (84 lbs CO/million cubic feet) by the annual natural gas usage (in mmcu.ft) for emissions unit B005 and the factor (1.0 ton/2000 lbs).

4. Emission Limitation -

0.91 lbs/hr of VOC emissions and 1.07 TPY when burning natural gas

Applicable Compliance Method -

Compliance with the hourly emission limit shall be determined by multiplying the maximum hourly natural gas usage of each emissions unit (164,952 cu.ft/hr) and the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.4 Table 1.4-2(7/98) emission factor for VOC (5.5 lbs VOC/million cubic feet).

The TPY emission rate shall be determined by multiplying the AP-42 emission factor for VOC (5.5 lbs VOC/million cubic feet) by the annual natural gas usage (in mmcu.ft) for emissions unit B005 and the factor (1.0 ton/2000 lbs).

5. Emission Limitation -

0.01 lb/hr of SO<sub>2</sub> emissions and 0.11 TPY when burning natural gas

Applicable Compliance Method -

Compliance with the hourly emission limit shall be determined by multiplying the maximum hourly natural gas usage of each emissions unit (164,952 cu.ft/hr) and the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.4 Table 1.4-2(7/98) emission factor for SO<sub>2</sub> (0.6 lbs SO<sub>2</sub>/million cubic feet).

The TPY emission rate shall be determined by multiplying the AP-42 emission factor for SO<sub>2</sub> (0.6 lbs SO<sub>2</sub>/million cubic feet) by the annual natural gas usage (in mmcu.ft) for emissions unit B005 and the factor (1.0 ton/2000 lbs).

6. Emission Limitation -

1.25 lb/hr of PM/PM<sub>10</sub> emissions and 1.49 TPY when burning natural gas

Applicable Compliance Method -

Compliance with the hourly emission limit shall be determined by multiplying the maximum hourly natural gas usage of each emissions unit (164,952 cu.ft/hr) by the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.4 Table 1.4-2(7/98) emission factor for PM/PM<sub>10</sub> (7.6 lbs PM/PM<sub>10</sub>/million cubic feet).

The TPY emission rate shall be determined by multiplying the AP-42 emission factor for PM/PM<sub>10</sub> (7.6 lbs PM/PM<sub>10</sub>/million cubic feet) by the annual natural gas usage (in mmcu.ft) for emissions unit B005 and the factor (1.0 ton/2000 lbs).

7. Emission Limitation -

24.7 lbs/hr of NO<sub>x</sub> emissions and 0.12 TPY when burning No.2 fuel oil

Applicable Compliance Method -

Compliance with the hourly emission limit shall be determined by multiplying the maximum hourly fuel oil burning capacity of each emissions unit (1237 gals/hr) by the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.3 Table 1.3-1(9/98) emission factor for NO<sub>x</sub> (20 lb/1000 gal).

The TPY emission rate will be determined by multiplying the above AP-42 emission factor by the annual No.2 fuel oil usage (in gallons) for emissions unit B005 and the factor (1.0 ton/2000 lbs).

8. Emission Limitation -

6.18 lbs/hr of CO emissions and 0.03 TPY when burning No.2 fuel oil

Applicable Compliance Method -

Compliance with the hourly emission limit shall be determined by multiplying the maximum hourly fuel oil burning capacity of each emissions unit (1237 gals/hr) by the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.3 Table 1.3-1(9/98) for CO (5 lb/1000 gal).

The TPY emission rate will be determined by multiplying the above AP-42 emission factor by the annual No.2 fuel oil usage (in gallons) for emissions unit B005 and the factor (1.0 ton/2000 lbs).

9. Emission Limitation -

2.47 lbs/hr of PM/PM<sub>10</sub> emissions and 0.012 TPY when burning No.2 fuel oil

Applicable Compliance Method -

Compliance with the hourly emission limit shall be determined by multiplying the maximum hourly fuel oil burning capacity of each emissions unit (1237 gals/hr) by the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.3 Table 1.3-1(9/98) for PM/PM<sub>10</sub> (2 lb/1000 gal).

The TPY emission rate will be determined by multiplying the above AP-42 emission factor by the annual No.2 fuel oil usage (in gallons) for emissions unit B005 and the factor (1.0 ton/2000 lbs).

10. Emission Limitation -

38.8 lbs/hr of SO<sub>2</sub> emissions and 0.18 TPY when burning No.2 fuel oil

Applicable Compliance Method -

Compliance with the lb/hr limitation shall be determined by multiplying the maximum hourly fuel oil burning capacity of the emissions unit (1237 gals/hr) by the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.3 Table 1.3-1(9/98) emission factor for SO<sub>2</sub> (157\*S lbs/1000gal where S = % weight of sulfur in the No.2 fuel oil).

The TPY emission rate shall be determined by multiplying the above lb/1000 gal emission factor by the annual No.2 fuel oil usage (in gallons) for emissions unit B005 and the factor (1.0 ton/2000 lbs).

11. Emission Limitation-

From burning natural gas  
69.1 TPY NO<sub>x</sub> as a 12-month rolling summation

Applicable Compliance Method -

Compliance with the above limitation shall be based on the recordkeeping requirement in Section B.5. of this permit.

12. Emission Limitation-

From burning natural gas  
32.8 TPY CO as a 12-month rolling summation

Applicable Compliance Method -

Compliance with the above limitation shall be based on the recordkeeping requirement in Section B.5. of this permit.

13. Emission Limitation -

From burning No.2 fuel oil:  
0.37 TPY SO<sub>2</sub> as a 12-month rolling summation

Applicable Compliance Method -

Compliance with the above limitation shall be based on the recordkeeping requirement in Section B.4. of this permit.

14. Emission Limitation -

From burning No.2 fuel oil:  
0.24 TPY NO<sub>x</sub> as a 12-month rolling summation

Applicable Compliance Method -

Compliance with the above limitation shall be based on the recordkeeping requirement in Section B.4. of this permit.

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: B.3, B.4, B.5, B.6, C.4, C.5, D.3 and D.4.

**PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. 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>
B006 - 173.2 mmBtu/hr natural gas/(no.2 oil alternate) fired boiler	OAC rule 3745-31-05(A)(3)	From burning natural gas 29.1 lbs/hr NOx emissions 13.8 lbs/hr CO emissions 0.91 lb/hr VOC emissions 0.10 lb/hr SO2 emissions 1.25 lbs/hr of PM/PM10 emissions See A.I.2a.
		From burning No.2 fuel oil 24.7 lbs/hr NOx emissions 6.18 lbs/hr CO emissions 2.47 lbs/hr of PM/PM10 emissions 38.8 lbs/hr SO2 emissions See A.I.2b.
		The requirements established pursuant to this rule also include the requirements of OAC rules 3745-17-07(A).
	OAC rule 3745-17-07(A)	20% opacity, as a six-minute average, except as provided by rule from the stack
	OAC rule 3745-17-10(B)(1)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-18-06(D)	

OAC rule 3745- 31-05(D)  
Synthetic Minor to avoid Title V  
and PSD

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

The combined annual emissions resulting from the operation of emission units B005 and B006 shall not exceed the following limits: When firing natural gas:  
69.1 TPY NOx as a 12-month rolling summation  
32.8 TPY CO as a 12-month rolling summation  
When firing No.2 fuel oil:  
0.37 TPY SO2 as a 12-month rolling summation  
0.24 TPY NOx as a 12-month rolling summation

## 2. Additional Terms and Conditions

- 2.a** When firing natural gas,  
The annual emissions resulting from the operation of emissions unit B006 shall not exceed the following limits:  
NOx 34.6 TPY  
CO 16.4 TPY  
VOC 1.08 TPY  
SO2 0.11 TPY  
PM/PM10 1.49 TPY
- 2.b** When firing No.2 fuel oil,  
The annual emissions resulting from the operation of emissions unit B006 shall not exceed the following limits:  
NOx 0.12 TPY  
CO 0.03 TPY  
SO2 0.19 TPY  
PM/PM10 0.012 TPY
- 2.c** This emissions unit was installed in June 1971. The fuel feed equipment serving it was upgraded in January 1985.
- 2.d** This emissions unit is not currently subject to the requirements specified in 40 CFR Part 60, Subpart Db (Standards of Performance for Industrial-Commercial-Institutional Steam

Generating Units) or 40 CFR Part 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.)

**B. Operational Restrictions**

1. The permittee shall burn only natural gas and/or No.2 fuel oil in this emissions unit.
2. The quality of the oil burned in this emissions unit shall meet the following specifications on an "as received" basis:
  - a. A sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.224 pounds sulfur dioxide/mmBtu actual heat input.

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

3. The combined maximum annual natural gas usage for emissions units B005 and B006 shall not exceed 783 mmcuft, based upon a rolling, 12-month summation of the natural gas usage rate figures.
4. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the natural gas usage rate for emission units B005-B006 specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Natural Gas Usage in mmcuft</u>
1	65.3
1-2	130.6
1-3	195.9
1-4	261.2
1-5	326.5
1-6	391.8
1-7	457.1
1-8	522.4
1-9	587.7
1-10	653.0
1-11	718.3
1-12	783.0

After the first 12 calendar months of operation following the issuance of this permit, compliance with the combined annual natural gas usage limitation for emission units B005 and B006 shall be based upon a rolling, 12-month summation of the natural gas usage figures.

5. The combined maximum annual No.2 fuel oil usage for sources B005 and B006 shall not exceed 24,000 gallons based upon a rolling, 12-month summation of the No. 2 fuel oil usage figures.
6. To ensure enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the No.2 fuel oil usage rates for B005 and B006 specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative gallons of No.2 fuel oil</u>
1	2,000
1-2	4,000
1-3	6,000
1-4	8,000
1-5	10,000
1-6	12,000
1-7	14,000
1-8	16,000
1-9	18,000
1-10	20,000
1-11	22,000
1-12	24,000

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual No.2 fuel oil usage limitation for emissions units B005 and B006 shall be based upon a rolling, 12-month summation of the No.2 fuel oil usage figures.

**C. Monitoring and/or Recordkeeping Requirements**

1. For each day during which the permittee burns a fuel other than natural gas and/or No.2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received and the permittee's or oil supplier's analyses for sulfur content and heat content.

4. The permittee shall maintain monthly records of the following information for emission units B005 and B006:
  - a. the No.2 fuel oil usage rate for each month in gallons.
  - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the No.2 fuel oil usage rates.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative No.2 fuel oil usage rates for each calendar month.

5. The permittee shall maintain monthly records of the following information for emission units B005 and B006:
  - a. the amount of natural gas burned for each month in cu.ft.
  - b. beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of natural gas burned in these emissions units.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative amount of natural gas burned for each calendar month.

#### **D. Reporting Requirements**

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or No.2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent by weight) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:
  - a. the total quantity of oil received in each shipment (gallons);
  - b. the weighted\* average sulfur dioxide emission rate (pounds/MMBtu) for the oil received during the calendar month; and
  - c. the weighted\* average heat content (Btu/gallon) of the oil received during the calendar month.

\*In proportion to the quantity of oil received in each shipment during the calendar month. These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the oil shipments received during the previous calendar quarters.

3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month No.2 fuel oil usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative No.2 fuel oil usage levels.
4. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month natural gas usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative natural gas usage levels.
5. **Sulfur Content in Oil Limitation:**  
The permittee shall submit deviation (excursion) reports which identify all exceedances of the sulfur content limitation for oil combusted in this emissions unit.

**E. Testing Requirements**

1. Emission Limitation -

20% opacity, as a six-minute average

Applicable Compliance Method(s) -

Compliance shall be determined by visible emission observations performed in accordance with USEPA Reference Method 9 and the procedures specified in OAC rule 3745-17-03 (B)(1).

2. Emission Limitation -

29.1 lbs/hr of NO<sub>x</sub> emissions and 34.6 TPY when burning natural gas

Applicable Compliance Method -

Compliance with the hourly emission limit shall be determined by multiplying the maximum hourly natural gas usage of each emissions unit (146,952 cu.ft/hr), the heating value for natural gas (1050 Btu/cu.ft) and the emission factor for NO<sub>x</sub> (0.168 lb/mmBtu) established through January 2000 performance testing.

The TPY emission rate shall be determined by multiplying the established emission factor for NO<sub>x</sub> (0.168 lb/mmBtu), the heating value for natural gas (1050 Btu/cu.ft), the annual natural gas usage (in mmcu.ft) for emissions unit B006 and the factor (1.0 ton/2000 lbs).

3. Emission Limitation -

13.8 lbs/hr of CO emissions and 16.4 TPY when burning natural gas

Applicable Compliance Method -

Compliance with the hourly emission limit shall be determined by multiplying the maximum hourly natural gas usage of each emissions unit (164,954 cu.ft/hr) and the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.4 Table 1.4-1(7/98) emission factor for CO (84 lbs CO/million cubic feet).

The TPY emission rate shall be determined by multiplying the AP-42 emission factor for CO (84 lbs CO/million cubic feet) by the annual natural gas usage (in mmcu.ft) for emissions unit B006 and the factor (1.0 ton/2000 lbs).

4. Emission Limitation -

0.91 lbs/hr of VOC emissions and 1.08 TPY when burning natural gas

Applicable Compliance Method -

Compliance with the hourly emission limit shall be determined by multiplying the maximum hourly natural gas usage of each emissions unit (164,952 cu.ft/hr) and the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.4 Table 1.4-2(7/98) emission factor for VOC (5.5 lbs VOC/million cubic feet).

The TPY emission rate shall be determined by multiplying the AP-42 emission factor for VOC (5.5 lbs VOC/million cubic feet) by the annual natural gas usage (in mmcu.ft) for emissions unit B006 and the factor (1.0 ton/2000 lbs).

5. Emission Limitation -

0.01 lb/hr of SO<sub>2</sub> emissions and 0.12 TPY when burning natural gas

Applicable Compliance Method -

Compliance with the hourly emission limit shall be determined by multiplying the maximum hourly natural gas usage of each emissions unit (164,952 cu.ft/hr) and the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.4 Table 1.4-2(7/98) emission factor for SO<sub>2</sub> (0.6 lbs SO<sub>2</sub>/million cubic feet).

The TPY emission rate shall be determined by multiplying the AP-42 emission factor for SO<sub>2</sub> (0.6 lbs SO<sub>2</sub>/million cubic feet) by the annual natural gas usage (in mmcu.ft) for emissions unit B006 and the factor (1.0 ton/2000 lbs).

6. Emission Limitation -

1.25 lb/hr of PM/PM<sub>10</sub> emissions and 1.49 TPY when burning natural gas

Applicable Compliance Method -

Compliance with the hourly emission limit shall be determined by multiplying the maximum hourly natural gas usage of each emissions unit (164,952 cu.ft/hr) by the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.4 Table 1.4-2(7/98) emission factor for PM/PM<sub>10</sub> (7.6 lbs PM/PM<sub>10</sub>/million cubic feet).

The TPY emission rate shall determined by multiplying the AP-42 emission factor for PM/PM10 (7.6 lbs PM/PM10/million cubic feet) by the annual natural gas usage (in mmcuf) for emissions unit B006 and the factor (1.0 ton/2000 lbs).

7. Emission Limitation -

24.7 lbs/hr of NOx emissions and 0.12 TPY when burning No.2 fuel oil

Applicable Compliance Method -

Compliance with the hourly emission limit shall be determined by multiplying the maximum hourly fuel oil burning capacity of each emissions unit (1237 gals/hr) by the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.3 Table 1.3-1(9/98) emission factor for NOx (20 lb/1000 gal).

The TPY emission rate will be determined by multiplying the above AP-42 emission factor by the annual No.2 fuel oil usage (in gallons) for emissions unit B006 and the factor (1.0 ton/2000 lbs).

8. Emission Limitation -

6.18 lbs/hr of CO emissions and 0.03 TPY when burning No.2 fuel oil

Applicable Compliance Method -

Compliance with the hourly emission limit shall be determined by multiplying the maximum hourly fuel oil burning capacity of each emissions unit (1237 gals/hr) by the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.3 Table 1.3-1(9/98) for CO (5 lb/1000 gal).

The TPY emission rate will be determined by multiplying the above AP-42 emission factor by the annual No.2 fuel oil usage (in gallons) for emissions unit B006 and the factor (1.0 ton/2000 lbs).

9. Emission Limitation -

2.47 lbs/hr of PM/PM10 emissions and 0.012 TPY when burning No.2 fuel oil

Applicable Compliance Method -

Compliance with the hourly emission limit shall be determined by multiplying the maximum hourly fuel oil burning capacity of each emissions unit (1237 gals/hr) by the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.3 Table 1.3-1(9/98) for PM/PM10 (2 lb/1000 gal).

The TPY emission rate will be determined by multiplying the above AP-42 emission factor by the annual No.2 fuel oil usage (in gallons) for emissions unit B006 and the factor (1.0 ton/2000 lbs).

10. Emission Limitation -

38.8 lbs/hr of SO<sub>2</sub> emissions and 0.19 TPY when burning No.2 fuel oil

Applicable Compliance Method -

Compliance with the lb/hr limitation shall be determined by multiplying the maximum hourly fuel oil burning capacity of the emissions unit (1237 gals/hr) by the U.S. EPA reference document AP-42, 5th edition Compilation of Air Pollution Emission Factors Section 1.3 Table 1.3-1(9/98) emission factor for SO<sub>2</sub> (157\*S lbs/1000gal where S = % weight of sulfur in the No.2 fuel oil).

The TPY emission rate shall be determined by multiplying the above lb/1000 gal emission factor by the annual No.2 fuel oil usage (in gallons) for emissions unit B006 and the factor (1.0 ton/2000 lbs).

11. Emission Limitation-

From burning natural gas  
69.1 TPY NO<sub>x</sub> as a 12-month rolling summation

Applicable Compliance Method -

Compliance with the above limitation shall be based on the recordkeeping requirement in Section B.5. of this permit.

12. Emission Limitation-

From burning natural gas  
32.8 TPY CO as a 12-month rolling summation

Applicable Compliance Method -

Compliance with the above limitation shall be based on the recordkeeping requirement in Section B.5. of this permit.

13. Emission Limitation -

From burning No.2 fuel oil:  
0.37 TPY SO<sub>2</sub> as a 12-month rolling summation

Applicable Compliance Method -

Compliance with the above limitation shall be based on the recordkeeping requirement in Section B.4. of this permit.

14. Emission Limitation -

From burning No.2 fuel oil:  
0.24 TPY NO<sub>x</sub> as a 12-month rolling summation

Applicable Compliance Method -

Compliance with the above limitation shall be based on the recordkeeping requirement in Section B.4. of this permit.

**F. Miscellaneous Requirements**

1. The following terms and conditions of this permit are federally enforceable: B.3, B.4, B.5, B.6, C.4, C.5, D.3 and D.4.

**NEW SOURCE REVIEW FORM B**

PTI Number: 13-03817

Facility ID: 1318004311

FACILITY NAME Cleveland Clinic Foundation

FACILITY DESCRIPTION Hospital CITY/TWP Cleveland

SIC CODE 8062 SCC CODE 1-03-006-02 EMISSIONS UNIT ID B005

EMISSIONS UNIT DESCRIPTION 171.3 mmBtu/hr natural gas/(no.2 oil alternate) fired boiler

DATE INSTALLED installed

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description		Actual Emissions Rate		PTI Allowable	
			Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	nat gas	1.25	1.49	1.25	1.49
		No.2 oil	2.47	0.012	2.47	0.012
PM <sub>10</sub>						
Sulfur Dioxide	non Attainment	nat gas	0.10	0.11	0.10	0.11
		No.2 oil	38.8	0.18	38.8	0.18
Organic Compounds	Attainment	nat gas	0.91	1.08	0.91	1.07
Nitrogen Oxides	Attainment	nat gas	29.1	34.5	29.1	34.5
		No.2 oil	24.7	0.12	24.7	0.12
Carbon Monoxide	Attainment	nat gas	13.8	16.4	13.8	16.4
		No.2 oil	6.18	0.03	6.18	0.03
Lead						
Other: Air Toxics						

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

Use of natural gas as primary fuel and compliance with the terms and conditions in this permit. 1 pounds/hr

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_

**NEW SOURCE REVIEW FORM B**

PTI Number: 13-03817

Facility ID: 1318004311

FACILITY NAME Cleveland Clinic Foundation

FACILITY DESCRIPTION Hospital CITY/TWP Cleveland

SIC CODE 8062 SCC CODE 1-03-006-02 EMISSIONS UNIT ID B006

EMISSIONS UNIT DESCRIPTION 173.2 mmBtu/hr natural gas/(no.2 oil alternate) fired boiler

DATE INSTALLED installed

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description		Actual Emissions Rate		PTI Allowable	
			Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	nat gas	1.25	1.49	1.25	1.49
		No.2 oil	2.47	0.012	2.47	0.012
PM <sub>10</sub>						
Sulfur Dioxide	non Attainment	nat gas	0.10	0.12	0.10	0.12
		No.2 oil	38.8	0.19	38.8	0.19
Organic Compounds	Attainment	nat gas	0.91	1.08	0.91	1.08
Nitrogen Oxides	Attainment	nat gas	29.1	34.6	29.1	34.6
		No.2 oil	24.7	0.12	24.7	0.12
Carbon Monoxide	Attainment	nat gas	13.8	16.4	13.8	16.4
		No.2 oil	6.18	0.03	6.18	0.03
Lead						
Other: Air Toxics						

APPLICABLE FEDERAL RULES:

NSPS? \_\_\_\_\_ NESHAP? \_\_\_\_\_ PSD? \_\_\_\_\_ OFFSET POLICY? \_\_\_\_\_

**WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?**

Use of natural gas as primary fuel and compliance with the terms and conditions in this permit. 1 pounds/hr

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? no

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$ \_\_\_\_\_

**TOXIC AIR CONTAMINANTS**

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED\*? \_\_\_\_\_ YES X NO

IDENTIFY THE AIR CONTAMINANTS: \_\_\_\_\_