



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: FINAL PERMIT TO INSTALL  
MONTGOMERY COUNTY  
Application No: 08-4035**

**CERTIFIED MAIL**

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

**DATE: 8/18/99**

Delphi Chassis Systems, Home Avenue  
Paul Schubert  
PO Box 1224 Mail Code V-53  
Dayton, OH 45401-1224

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

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
236 East Town Street, Room 300  
Columbus, Ohio 43215

Very truly yours,  
Field Operations and Permit Section  
Division of Air Pollution Control

cc: US EPA  
REGIONAL AIR POLLUTION CONTROL AGENCY  
April Bott Ohio AGO  
Tammy Van Walsen Ohio EPA, DAPC, Engineering



**FINAL PERMIT TO INSTALL 08-4035**

Application Number: 08-4035

APS Premise Number: 0857040931

Permit Fee: **\$400**

Name of Facility: Delphi Chassis Systems, Home Avenue

Person to Contact: Paul Schubert

Address: PO Box 1224 Mail Code V-53  
Dayton, OH 45401-1224

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

**2701 Home Avenue  
Dayton, Ohio**

Description of proposed emissions unit(s):

**2-54 MMBTU/HR NATURAL GAS FIRED BOILERS.**

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 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 promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with

OAC rule 3745-15-06. 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. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.14 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. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. 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 submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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 paragraph (E) of OAC rule 3745-77-03.
  - 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.
  - d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
    - i. Compliance certifications shall be submitted on an annual basis unless the applicable requirement specifies more frequent submissions.
    - ii. Compliance certifications shall include the following:
      - (a) An identification of each term or condition of this permit that is the basis of the certification.
      - (b) The permittee's current compliance status.
      - (c) Whether compliance was continuous or intermittent.
      - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
      - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
    - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

## **10. Emergencies**

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

**11. Title V Permit To Operate Application**

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.

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

**3. Records Retention Requirements**

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

**4. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also

furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

**5. Scheduled Maintenance/Malfunction Reporting**

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

**6. Permit Transfers**

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

**7. Air Pollution Nuisance**

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

**8. Termination of Permit To Install**

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

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

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance

that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate 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 prove to be inadequate or cannot meet applicable standards.

**10. Public Disclosure**

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

**11. Applicability**

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

**12. Best Available Technology**

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

**13. 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.

**14. 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**

<u>Pollutant</u>	<u>Tons Per Year</u>
PM	9.54
SO <sub>2</sub>	0.28
NO <sub>x</sub>	38.2
VOC	2.62
CO	34.8

---

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

**A. State and Federally Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Natural Gas Fired Boiler; 54.4 mmBtu/hr maximum heat input	OAC 3745-17-10 (B)(1)	0.020 pound of particulate emissions per million BTU actual heat input
	OAC 3745-17-07 (A)	Opacity shall not exceed 20 percent as a 6-minute average, except for one 6-minute period in any one hour when up to 60 percent is permissible
	40 CFR Part 60, Subpart Dc	There are no specific requirements for units burning only natural gas.

2. **Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

1. The permittee shall burn only natural gas in this emissions unit.

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

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

**IV. Reporting Requirements**

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

**V. Testing Requirements**

1. Compliance with the emission limitation(s) in A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation-

0.020 lb particulate emissions per mmBtu actual heat input

Applicable Compliance Method-

Compliance shall be based upon multiplying the maximum hourly gas burning capacity of the emissions unit (0.054 MMcu.ft/hr) by the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 emission factor for natural gas (6.2 lbs/MMcu.ft) and dividing by the maximum hourly heat input of the emissions unit (54.4 mmBtu/hr).

- b. Emission Limitation-

20% visible emission opacity limit, as a 6-minute average except for one 6-minute period in any one hour when up to 60 percent is permissible

Applicable Compliance Method-

Compliance is presumed through the use of inherently clean fuels. If required, compliance shall be demonstrated by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1) using the methods and procedures specified in USEPA Reference Method 9.

**VI. Miscellaneous Requirements**

1. The issuance of this PTI 08-4035 is based on the permanent decommissioning of the existing emissions units identified below.

0857040931 B501-84 mmBtu/hr coal fired boiler  
0857040931 B502-84 mmBtu/hr coal fired boiler  
0857040931 B503-132 mmBtu/hr coal fired boiler

In accordance with OAC rule 3745-35-02 (C)(4)(b) the new natural gas fired boilers, identified in this permit as B505 and B506, shall be performance tested within 90 days of start-up. Additionally, within 90 days of startup of the new natural gas fired boilers, the permittee shall permanently cease

operation of the existing emissions units B501, B502 and B503.

**B. State Only Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Natural Gas Fired Boiler; 54.4 mmBtu/hr maximum heat input	OAC rule 3745-31-05	PM: 4.77 TPY SO <sub>2</sub> : 0.0006 lb/mmBtu; 0.14 TPY NO <sub>x</sub> : 0.08 lb/mmBtu; 19.1 TPY VOC: 0.0055 lb/mmBtu; 1.31 TPY CO: 0.073 lb/mmBtu; 17.4 TPY  10% visible emission opacity, as a 6-minute average

**2. Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

None.

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

None.

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

1. Compliance with the emissions limitations in this permit shall be determined in accordance with the following methods:

- a. Emission Limitation-

4.77 TPY Particulate

Applicable Compliance Method-

The 4.77 TPY limitation was developed by multiplying the specified allowable emission rate of 0.020 pound particulate per mmBtu of actual heat input by the maximum hourly heat input capacity of 54.4 mmBtu. Then the result, 1.09 pounds/hour, was multiplied by the maximum operating schedule of 8760 hours/year. Therefore, since compliance with the pound/mmBtu is demonstrated through the application of the AP-42 emission factor as expressed in Section A.V.1.a., compliance will also be shown with the annual limitation.

- b. Emission Limitation-

0.0006 pound SO<sub>2</sub>/ mmBtu

Applicable Compliance Method-

The 0.0006 pound SO<sub>2</sub>/mmBtu limitation was developed by multiplying the maximum hourly gas burning capacity of the emissions unit (54,400 cubic feet/hour) by the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, 2/98, Section 1.4, Table 1.4-2 for natural gas (0.6 pound SO<sub>2</sub>/million cubic feet), dividing by the maximum hourly heat input capacity of the emissions unit (54.4 mmBtu/hour).

- c. Emission Limitation-

0.14 TPY SO<sub>2</sub>

Applicable Compliance Method-

The 0.14 TPY limitation was developed by multiplying the specified allowable emission rate of 0.0006 pound SO<sub>2</sub>/mmBtu by the maximum hourly heat input capacity of 54.4 mmBtu. Then the result, 0.03 pound/hour, was multiplied by the maximum operating schedule of 8760 hours/year. Therefore, since compliance with the pound/mmBtu is demonstrated through the application of the AP-42 emission factor as expressed in Section B.V.1.b., compliance will also be shown with the annual limitation.

- d. Emission Limitation-

0.08 lb NO<sub>x</sub>/mmBtu

Applicable Compliance Method-

Compliance shall be based upon stack testing using the USEPA Reference Methods 7 through 7E as specified in 40 CFR Part 60, Appendix A.

e. Emission Limitation-

19.1 TPY NO<sub>x</sub>

Applicable Compliance Method-

The 19.1 TPY limitation was developed by multiplying the specified allowable emission rate of 0.08 pound NO<sub>x</sub>/mmBtu by the maximum hourly heat input capacity of 54.4 mmBtu. Then the result, 4.35 pound/hour, was multiplied by the maximum operating schedule of 8760 hours/year. Therefore, provided compliance is shown with the pound/mmBtu limitation, compliance will also be shown with the annual limitation.

f. Emission Limitation-

0.0055 pound VOC/mmBtu

Applicable Compliance Method-

The 0.0055 pound VOC/mmBtu limitation was developed by multiplying the maximum hourly gas burning capacity of the emissions unit (54,400 cubic feet/hour) by the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, 2/98, Section 1.4, Table 1.4-3 for natural gas (5.5 pound VOC/million cubic feet), dividing by the maximum hourly heat input capacity of the emissions unit (54.4 mmBtu/hour).

g. Emission Limitation-

1.31 TPY VOC

Applicable Compliance Method-

The 1.31 TPY limitation was developed by multiplying the specified allowable emission rate of 0.0055 pound VOC/mmBtu by the maximum hourly heat input capacity of 54.4 mmBtu. Then the result, 0.30 pound/hour, was multiplied by the maximum operating schedule of 8760 hours/year. Therefore, since compliance with the pound/mmBtu is demonstrated through the application of the AP-42 emission factor as expressed in Section B.V.1.f., compliance will also be shown with the annual limitation.

h. Emission Limitation-

0.073 pound CO/mmBtu

Applicable Compliance Method-

Compliance shall be based upon an emission factor of 0.073 lb CO/mmBtu, as specified by the manufacturer. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in USEPA Reference Method 10.

i. Emission Limitation-

17.4 TPY CO

Applicable Compliance Method-

The 17.4 TPY limitation was developed by multiplying the specified allowable emission rate of 0.073 pound CO/mmBtu by the maximum hourly heat input capacity of 54.4 mmBtu. Then the result, 3.97 pound/hour, was multiplied by the maximum operating schedule of 8760 hours/year. Therefore, provided compliance is shown with the pound/mmBtu limitation, compliance will also be shown with the annual limitation.

j. Emission Limitation-

10% visible emission opacity, as a 6-minute average

Applicable Compliance Method-

Compliance is presumed through the use of inherently clean fuels. If required, compliance shall be demonstrated by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1) using the methods and procedures specified in USEPA Reference Method 9.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted to demonstrate compliance with the allowable emission limitation for NOx.

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for NOx, Method 7 of 40 CFR Part 60, Appendix A.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the

test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

## **VI. Miscellaneous Requirements**

None.

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S) [Continued]**

**A. State and Federally Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Natural Gas Fired Boiler; 54.4 mmBtu/hr maximum heat input	OAC 3745-17-10 (B)(1)	0.020 pound of particulate emissions per million BTU actual heat input
	OAC 3745-17-07 (A)	Opacity shall not exceed 20 percent as a 6-minute average, except for one 6-minute period in any one hour when up to 60 percent is permissible
	40 CFR Part 60, Subpart Dc	There are no specific requirements for units burning only natural gas.

2. **Additional Terms and Conditions**

- 2.a None.

**II. Operational Requirements**

1. The permittee shall burn only natural gas in this emissions unit.

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

1. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

#### **IV. Reporting Requirements**

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

#### **V. Testing Requirements**

1. Compliance with the emission limitation(s) in A.I.1. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation-

0.020 lb particulate emissions per mmBtu actual heat input

Applicable Compliance Method-

Compliance shall be based upon multiplying the maximum hourly gas burning capacity of the emissions unit (0.054 MMcu.ft/hr) by the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.4, Table 1.4-2 emission factor for natural gas (6.2 lbs/MMcu.ft) and dividing by the maximum hourly heat input of the emissions unit (54.4 mmBtu/hr).

- b. Emission Limitation-

20% visible emission opacity limit, as a 6-minute average except for one 6-minute period in any one hour when up to 60 percent is permissible

Applicable Compliance Method-

Compliance is presumed through the use of inherently clean fuels. If required, compliance shall be demonstrated by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1) using the methods and procedures specified in USEPA Reference Method 9.

#### **VI. Miscellaneous Requirements**

1. The issuance of this PTI 08-4035 is based on the permanent decommissioning of the existing emissions units identified below.

0857040931 B501-84 mmBtu/hr coal fired boiler  
0857040931 B502-84 mmBtu/hr coal fired boiler  
0857040931 B503-132 mmBtu/hr coal fired boiler

In accordance with OAC rule 3745-35-02 (C)(4)(b) the new natural gas fired boilers, identified in this permit as B505 and B506, shall be performance tested within 90 days of start-up. Additionally, within 90 days of startup of the new natural gas fired boilers, the permittee shall permanently cease

operation of the existing emissions units B501, B502 and B503.

**B. State Only Enforceable Section**

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

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
Natural Gas Fired Boiler; 54.4 mmBtu/hr maximum heat input	OAC rule 3745-31-05	PM: 4.77 TPY SO <sub>2</sub> : 0.0006 lb/mmBtu; 0.14 TPY NO <sub>x</sub> : 0.08 lb/mmBtu; 19.1 TPY VOC: 0.0055 lb/mmBtu; 1.31 TPY CO: 0.073 lb/mmBtu; 17.4 TPY  10% visible emission opacity, as a 6-minute average

2. **Additional Terms and Conditions**

- 2.a None.

**II. Operational Restrictions**

None.

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

None.

**IV. Reporting Requirements**

None.

**V. Testing Requirements**

1. Compliance with the emissions limitations in this permit shall be determined in accordance with the following methods:

- a. Emission Limitation-

4.77 TPY Particulate

Applicable Compliance Method-

The 4.77 TPY limitation was developed by multiplying the specified allowable emission rate of 0.020 pound particulate per mmBtu of actual heat input by the maximum hourly heat input capacity of 54.4 mmBtu. Then the result, 1.09 pounds/hour, was multiplied by the maximum operating schedule of 8760 hours/year. Therefore, since compliance with the pound/mmBtu is demonstrated through the application of the AP-42 emission factor as expressed in Section A.V.1.a., compliance will also be shown with the annual limitation.

- b. Emission Limitation-

0.0006 pound SO<sub>2</sub>/ mmBtu

Applicable Compliance Method-

The 0.0006 pound SO<sub>2</sub>/mmBtu limitation was developed by multiplying the maximum hourly gas burning capacity of the emissions unit (54,400 cubic feet/hour) by the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, 2/98, Section 1.4, Table 1.4-2 for natural gas (0.6 pound SO<sub>2</sub>/million cubic feet), dividing by the maximum hourly heat input capacity of the emissions unit (54.4 mmBtu/hour).

- c. Emission Limitation-

0.14 TPY SO<sub>2</sub>

Applicable Compliance Method-

The 0.14 TPY limitation was developed by multiplying the specified allowable emission rate of 0.0006 pound SO<sub>2</sub>/mmBtu by the maximum hourly heat input capacity of 54.4 mmBtu. Then the result, 0.03 pound/hour, was multiplied by the maximum operating schedule of 8760 hours/year. Therefore, since compliance with the pound/mmBtu is demonstrated through the application of the AP-42 emission factor as expressed in Section B.V.1.b., compliance will also be shown with the annual limitation.

- d. Emission Limitation-

0.08 lb NO<sub>x</sub>/mmBtu

Applicable Compliance Method-

Compliance shall be based upon stack testing using the USEPA Reference Methods 7 through 7E as specified in 40 CFR Part 60, Appendix A.

e. Emission Limitation-

19.1 TPY NO<sub>x</sub>

Applicable Compliance Method-

The 19.1 TPY limitation was developed by multiplying the specified allowable emission rate of 0.08 pound NO<sub>x</sub>/mmBtu by the maximum hourly heat input capacity of 54.4 mmBtu. Then the result, 4.35 pound/hour, was multiplied by the maximum operating schedule of 8760 hours/year. Therefore, provided compliance is shown with the pound/mmBtu limitation, compliance will also be shown with the annual limitation.

f. Emission Limitation-

0.0055 pound VOC/mmBtu

Applicable Compliance Method-

The 0.0055 pound VOC/mmBtu limitation was developed by multiplying the maximum hourly gas burning capacity of the emissions unit (54,400 cubic feet/hour) by the AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, 2/98, Section 1.4, Table 1.4-3 for natural gas (5.5 pound VOC/million cubic feet), dividing by the maximum hourly heat input capacity of the emissions unit (54.4 mmBtu/hour).

g. Emission Limitation-

1.31 TPY VOC

Applicable Compliance Method-

The 1.31 TPY limitation was developed by multiplying the specified allowable emission rate of 0.0055 pound VOC/mmBtu by the maximum hourly heat input capacity of 54.4 mmBtu. Then the result, 0.30 pound/hour, was multiplied by the maximum operating schedule of 8760 hours/year. Therefore, since compliance with the pound/mmBtu is demonstrated through the application of the AP-42 emission factor as expressed in Section B.V.1.f., compliance will also be shown with the annual limitation.

h. Emission Limitation-

0.073 pound CO/mmBtu

Applicable Compliance Method-

Compliance shall be based upon an emission factor of 0.073 lb CO/mmBtu, as specified by the manufacturer. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in USEPA Reference Method 10.

i. Emission Limitation-

17.4 TPY CO

Applicable Compliance Method-

The 17.4 TPY limitation was developed by multiplying the specified allowable emission rate of 0.073 pound CO/mmBtu by the maximum hourly heat input capacity of 54.4 mmBtu. Then the result, 3.97 pound/hour, was multiplied by the maximum operating schedule of 8760 hours/year. Therefore, provided compliance is shown with the pound/mmBtu limitation, compliance will also be shown with the annual limitation.

j. Emission Limitation-

10% visible emission opacity, as a 6-minute average

Applicable Compliance Method-

Compliance is presumed through the use of inherently clean fuels. If required, compliance shall be demonstrated by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1) using the methods and procedures specified in USEPA Reference Method 9.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

The emission testing shall be conducted to demonstrate compliance with the allowable emission limitation for NOx.

The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for NOx, Method 7 of 40 CFR Part 60, Appendix A.

The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the

test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

## **VI. Miscellaneous Requirements**

None.