

Synthetic Minor Determination and/or Netting Determination

Permit To Install: "04-01475"

A. Source Description

The City of Toledo, Division of Water Reclamation (OEPA premise # 0448010737) is located at 3900 North Summit Street in the City of Toledo, Lucas County. It was formerly permitted as a Title V facility with 4 dual fuel engines (1-438 hp, 2-850hp and 1-560 hp) with the capability to burn natural gas, digester gas or #2 fuel oil. All four units were removed in 2004/2005. No other significant sources of emissions existed at this location and the City of Toledo subsequently petitioned to be removed from Title V.

Beginning in 2005, a total of 6 new generators were installed, however 4 of the generators were utilized as stand-by only and now qualify for an exemption from permit to install requirements by OAC rule 3745-31-03(A)(4)(b), a permit-by-rule exemption. The remaining two generators, P105 and P106 are rated at 1.6MW each and are intended to utilize the available digester gas as a fuel with natural gas utilized only as a back-up. The available digester gas supply will provide enough fuel to operate one generator at approximately 100% of the rated capacity. To avoid Title V applicability, the City has requested a limitation for NOx to minor source status by accepting a restriction to a combined 9,000 hours per year of operation for P105 & P106.

B. Facility Emissions and Attainment Status

This facility was a minor source for organic compounds, particulates and sulfur dioxides. This facility was a major source for nitrogen oxides at 921 tpy total for all 4-generators and major for carbon monoxide 254 tpy total. It is located in the City of Toledo in Lucas County. This location has the following status:

<u>Pollutant</u>	<u>Attainment Status</u>
CO	unclassifiable
NOx	unclassifiable
O3 (VOC)	non-attainment
PE	not applicable
PM10	unclassifiable
SO2	attainment
Pb	not designated

Existing facility-wide emissions are attributed solely to the removed engines. These engines had a potential to emit greater than PSD major source status for NOx.

C. Source Emissions

tpy	CO	NOx	PM10	VOC	SO2
standby diesel generator	0.92	17.69	0.17	0.59	2.92
3 standby natural gas generators combined	11.25	4.77	0.57	2.91	0.009
P105 & P106 with joint 9,000 hour usage restriction	67.59	28.64	0.01	17.46	30.24
total facility wide emissions	79.76	51.10	0.75	20.96	33.17
PSD significance level	100	40	40	15	40

Because the removed generators had a potential to emit of NOx greater than 250 tons per year the installation of the new generators has been reviewed for PSD purposes and determined to exceed NOx significance levels. The facility will be allowed to avoid PSD applicability by a netting review. The last two years with full operation of the removed generators were 2000 and 2001 which reported an annual average emission rate of 271 tons of NOx per year. The new units were installed in 2005 and 2006, within the 10 year window, with a Federally enforceable potential to emit of 51.1 tons of NOx per year, resulting in a net decrease of emissions of 219.9 tons of NOx per year.

D. Conclusion

To avoid major source applicability for Title V purposes, Water Reclamation will be restricted to a combined operational restriction of 9,000 hours per year for P105 & P106. At this level of emissions, the installation of the 6 new generators has netted out of PSD applicability.



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

CERTIFIED MAIL

RE: DRAFT PERMIT TO INSTALL

LUCAS COUNTY

Application No: 04-01475

Fac ID: 0448010737

DATE: 9/25/2007

City of Toledo/Div.of Water Reclamation
Michael Schreidah
3900 N. Summit Street
Toledo, OH 43611

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

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, 43216-1049.

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 **\$800** 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.

Sincerely,

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

LUCAS COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **04-01475** FOR AN AIR CONTAMINANT SOURCE
FOR **City of Toledo/Div.of Water Reclamation**

On 9/25/2007 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **City of Toledo/Div.of Water Reclamation**, located at **3900 North Summit Street, Toledo**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 04-01475:

Installation of 6 generators; 1-diesel fuel, 3-natural gas and 2 digester gas.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Karen Granata, Toledo Department of Environmental Services, 348 South Erie Street, Toledo, OH 43604 [(419)936-3015]



**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 04-01475

Application Number: 04-01475

Facility ID: 0448010737

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

Name of Facility: City of Toledo/Div.of Water Reclamation

Person to Contact: Michael Schreidah

Address: 3900 N. Summit Street
Toledo, OH 43611

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

**3900 North Summit Street
Toledo, Ohio**

Description of proposed emissions unit(s):

Installation of 6 generators; 1-diesel fuel, 3-natural gas and 2 digester gas.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. 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 (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

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

2. Scheduled Maintenance/Malfunction Reporting

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

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

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

7. Fees

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

8. Federal and State Enforceability

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

9. Compliance Requirements

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

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

10. Permit-To-Operate Application

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

11. Best Available Technology

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

12. Air Pollution Nuisance

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

13. Permit-To-Install

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

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

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

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

3. Permit Transfers

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

4. Authorization To Install or Modify

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

5. Construction of New Sources(s)

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

6. Public Disclosure

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

7. Applicability

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

8. Construction Compliance Certification

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

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

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

C. Permit-To-Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
CO	67.59
NOx	28.64
VOC	17.46
PM10	0.01
SO2	30.24

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

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

The permittee has permanently shutdown emissions units P001, P003, P004, P005 and P006 resulting in an average actual emissions decrease of 220 tons per year NOx based on the average for calendar year 2000 and 2001.

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.

Operations, Property, and/or Equipment - (P105) - 2889 HP(natural gas) and 2233 HP(digester gas) generator, Engine Generator No. 5

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The requirements of this rule also include compliance with OAC rule 3745-17-07(A)(1), OAC rule 3745-17-11(B)(5)(b) and OAC rule 3745-18-06(G)</p> <p>Nitrogen Oxide (NOx) emissions shall not exceed 6.36 lb/hr and 27.86 tons per year</p> <p>Carbon Monoxide (CO) emissions shall not exceed 15.02 lb/hr and 65.78 tons per year</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 3.88 lb/hr and 16.99 tons per year</p> <p>Sulfur dioxide (SO2) emissions shall not exceed 6.72 lbs/hr and 29.43 tons per year.</p>
OAC rule 3745-31-05(C)	<p>The combined emissions from P105 and P106 shall not exceed 28.64 tons per year NOx as a rolling, 12-month summation of the monthly emissions</p> <p>The combined emissions from P105 and P106 shall not exceed 67.59 tons per year CO as a rolling, 12-month summation of the monthly emissions</p> <p>The combined emissions from P105 and P106 shall not exceed 17.46 tons per year VOC as a rolling, 12-month summation of the monthly emissions</p> <p>The combined emissions from P105 and P106 shall not exceed 30.24 tons per year SO2 as a rolling, 12-month summation of</p>

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	monthly emissions
OAC rule 3745-17-07(A)(1)	Visible emissions of particulate shall not exceed 20% opacity as a 6-minute average, unless otherwise specified by the rule.
OAC rule 3745-17-11(B)(5)(b)	Particulate Emissions (as PM10) shall not exceed 0.062 pound per mmBtu of actual heat input
OAC rule 3745-18-06(G)	Sulfur Dioxide emissions shall not exceed 0.5 lb/MMBtu
OAC rule 3745-21-08(B)	See section A.I.2.a
ORC 3704.03(T)(3)	See section A.I.2.b

2. Additional Terms and Conditions

- 2.a** The permittee shall satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.b** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled PE emissions from this air contaminant source since the potential to emit for PE is less than 10 tons per year.

II. Operational Restrictions

- The permittee shall only burn digester gas and/or natural gas in this emissions unit.

2. The quality of digester gas burned in this emissions unit shall meet on an "as burned" basis a sulfur content which is sufficient to comply with the allowable sulfur dioxide limitation of 0.5 pound of sulfur dioxide per million Btu of actual heat input.
3. The maximum combined annual operating rate for P105 & P106 shall not exceed 9000 hours, based upon a rolling, 12-month summation of the monthly operating hours.

To ensure enforceability during the first 12 calendar months of operations or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours specified in the following table.

<u>Month</u>	<u>Maximum Allowable Cumulative Operating Hours (P105 and P106 combined)</u>
1	1000
1-2	2000
1-3	3000
1-4	4000
1-5	5000
1-6	6000
1-7	7000
1-8	8000
1-9	9000
1-10	9000
1-11	9000
1-12	9000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the combined annual limitation shall be based upon a rolling, 12-month summation of the monthly operating hours.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.
3. The permittee shall install and maintain a device (hour meter) capable of tracking the total hours of operation of the engine.
4. For each day during which the permittee burns a fuel other than digester gas and/or natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
5. The permittee shall collect a representative sample for the digester gas that is burned in this emissions unit.

Sampling shall be performed initially on a quarterly basis. (The permittee may petition the Director to reduce testing frequency based on sampling records.) The permittee shall perform analyses of each digester gas sample for sulfur content, heat content and density in accordance with the appropriate ASTM methods. Alternate, equivalent test methods may be used upon written approval by the Toledo Division of Environmental Services.

6. The permittee shall maintain monthly records of the following information:
 - a. the operating hours of this emissions unit and of P106 for each month; and
 - b. beginning after the first 12 calendar months following the issuance of this permit, the permittee shall record the rolling, 12- month summation of the combined operating hours for P105 and P106.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative operating hours for P105 and P106 combined for each calendar month.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that:
 - a.
 - i. identify all days during which any visible particulate emissions were observed from the digester gas generator serving this emissions unit;
 - ii. describe any corrective actions taken to minimize or eliminate the visible particulate;
 - iii. identify each day during which an inspection was not performed by the required frequency.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month combined operating hours limitation for P105 & P106. For the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative combined operating hours for P105 and P106. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or digester gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation(s) occurs.
4. The permittee shall submit, on a quarterly basis, copies of the permittee's analyses performed during the previous 3 calendar months for the digester gas burned in this emissions unit. The permittees' analyses shall document the sulfur content (percent by volume), heat content (Btu/cuft) and calculated sulfur dioxide emission rate (lb/mmBtu) for each sample.
5. If no deviations occurred during the calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that period. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit by January 31, April 30, July 31, and October 31.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:

Visible particulate emissions shall not exceed 20 percent opacity as a six-minute average, except as specified by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

b. Emissions Limitation:

The emissions of NO_x shall not exceed 6.36 pounds per hour.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit at the maximum operating load of 1.6MW. Compliance may be demonstrated through calculations performed as follows: multiply the manufacturer's supplied emission factor (1 g/hp-hr) by the maximum operating horsepower (2889 hp) and divide by 454 g/lb.

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 4 and 7E of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

c. Emissions Limitation:

The emissions of NO_x shall not exceed 27.86 tons per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit at a maximum operating rate of 8760 hours per year. Compliance may be demonstrated through calculations performed as follows: multiply the hourly allowable emissions rate (6.36 lbs/hr NO_x) by the 8760 hours of operation and divide by 2,000 pounds per ton.

d. Emissions Limitation:

PE emissions shall not exceed 0.062 pound per mmBtu of actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

e. Emission Limitation

VOC emissions shall not exceed 3.88 pound per hour

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit at the maximum operating load of 1.6MW. Compliance may be demonstrated through calculations performed as follows: multiply the manufacturer's supplied emission factor (0.61 g/hp-hr) by the maximum operating horsepower (2889 hp) and divide by 454 g/lb.

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 4 and 25 or 25A of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

f. Emission Limitation

VOC emissions shall not exceed 16.99 ton per year

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit at a maximum total operating rate of 8760 hours per year. Compliance may be demonstrated through calculations performed as follows: multiply the hourly allowable emissions rate (3.88 lbs/hr VOC) by 8760 hours of operation and divide by 2,000 pounds per ton.

g. Emission Limitation:

CO emissions shall not exceed 15.02 pound per hour

Applicable Compliance Method

This emission limitation was established to reflect the potential to emit for this emissions unit at the maximum operating load of 1.6MW. Compliance may be demonstrated through calculations performed as follows: multiply the manufacturer's supplied emission factor (2.36 g/hp-hr) by the maximum operating horsepower (2889 hp) and divide by 454 g/lb.

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

h. Emission Limitation:

CO emissions shall not exceed 65.78 tons per year

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit at a maximum total operating rate of 8760 hours per year. Compliance may be demonstrated through calculations performed as follows: multiply the hourly allowable emissions rate (15.02 lbs/hr CO) by 8760 hours of operation and divide by 2,000 pounds per ton.

i. Emission Limitation

SO₂ emissions shall not exceed 6.72 lbs/hr

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit at the maximum operation load of 1.6MW while burning digester gas. Compliance may be demonstrated through calculations performed as follows: Multiply the maximum heat input for digester gas, 13.43 mmBtu/hr by the maximum sulfur content, 0.5 lb/mmBtu.

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

j. Emission Limitation:

SO₂ emissions shall not exceed 29.43 ton/yr

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit at a maximum total operating rate of 8760 hours per year. Compliance may be demonstrated through calculations performed as follows: multiply the hourly allowable emissions rate (6.72 lbs/hr SO₂) by the 8760 hours of operation limitation and divide by 2,000 pounds per ton.

k. Emission Limitation:

The combined emissions from P105 and P106 shall not exceed 28.64 tons per year of NO_x as a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the actual combined hours of operation of P105 and P106 as recorded under Section III.6 by the allowable hourly emissions rate (6.36 lb/hr) and dividing by 2000 pounds per ton.

I. Emission Limitation:

The combined emissions from P105 and P106 shall not exceed 67.59 tons per year of CO as a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the actual combined hours of operation of P105 and P106 as recorded under Section III.6 by the allowable hourly emissions rate (15.02 lb/hr) and dividing by 2000 pounds per ton.

m. Emission Limitation:

The combined emissions from P105 and P106 shall not exceed 17.46 tons per year of VOC as a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the actual combined hours of operation of P105 and P106 as recorded under Section III.6 by the allowable hourly emissions rate (3.88 lb/hr) and dividing by 2000 pounds per ton.

n. Emission Limitation:

The combined emissions from P105 and P106 shall not exceed 30.24 tons per year of SO₂ as a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the actual combined hours of operation of P105 and P106 as recorded under Section III.6 by the allowable hourly emissions rate (6.72 lb/hr) and dividing by 2000 pounds per ton.

o. Emission Limitation:

SO₂ emissions shall not exceed 0.5 lb/mmBtu

Applicable Compliance Method

If required, the permittee shall demonstrate compliance using the procedures specified in OAC rule

City of Toledo/Div.of Water Reclamation
PTI Application: 04-01475
Issued: To be entered upon final issuance

Facility ID: 0448010737
Emissions Unit ID: P105

3745-18-04(E) and 3745-18-04(F)(3). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

VI. Miscellaneous Requirements

1. Upon issuance of this permit, all terms and conditions shall be federally enforceable.

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.

Operations, Property, and/or Equipment - (P105) - 2889 HP(natural gas) and 2233 HP(digester gas) generator, Engine Generator No. 5

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	None

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

None

VI. Miscellaneous Requirements

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.

Operations, Property, and/or Equipment - (P106) - 2889 HP(natural gas) and 2233 HP(digester gas) generator, Engine Generator No. 6

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05(A)(3)	<p>The requirements of this rule also include compliance with OAC rule 3745-17-07(A)(1), OAC rule 3745-17-11(B)(5)(b) and OAC rule 3745-18-06(G)</p> <p>Nitrogen Oxide (NOx) emissions shall not exceed 6.36 lb/hr and 27.86 tons per year</p> <p>Carbon Monoxide (CO) emissions shall not exceed 15.02 lb/hr and 65.78 tons per year</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 3.88 lb/hr and 16.99 tons per year</p> <p>Sulfur dioxide (SO2) emissions shall not exceed 6.72 lbs/hr and 29.43 tons per year.</p>
OAC rule 3745-31-05(C)	<p>The combined emissions from P105 and P106 shall not exceed 28.64 tons per year NOx as a rolling, 12-month summation of the monthly emissions</p> <p>The combined emissions from P105 and P106 shall not exceed 67.59 tons per year CO as a rolling, 12-month summation of the monthly emissions</p> <p>The combined emissions from P105 and P106 shall not exceed 17.46 tons per year VOC as a rolling, 12-month summation of the monthly emissions</p> <p>The combined emissions from P105 and P106 shall not exceed 30.24 tons per year SO2 as a rolling, 12-month summation of</p>

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	monthly emissions
OAC rule 3745-17-07(A)(1)	Visible emissions of particulate shall not exceed 20% opacity as a 6-minute average, unless otherwise specified by the rule.
OAC rule 3745-17-11(B)(5)(b)	Particulate Emissions (as PM10) shall not exceed 0.062 pound per mmBtu of actual heat input
OAC rule 3745-18-06(G)	Sulfur Dioxide emissions shall not exceed 0.5 lb/MMBtu
OAC rule 3745-21-08(B)	See section A.1.2.a
ORC 3704.03(T)(3)	See section A.2.1.b

2. Additional Terms and Conditions

- 2.a** The permittee shall satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.b** The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled PE emissions from this air contaminant source since the potential to emit for PE is less than 10 tons per year.

II. Operational Restrictions

1. The permittee shall only burn digester gas and/or natural gas in this emissions unit.

2. The quality of digester gas burned in this emissions unit shall meet on an "as burned" basis a sulfur content which is sufficient to comply with the allowable sulfur dioxide limitation of 0.5 pound of sulfur dioxide per million Btu of actual heat input.
3. The maximum combined annual operating rate for P105 & P106 shall not exceed 9000 hours, based upon a rolling, 12-month summation of the monthly operating hours.

To ensure enforceability during the first 12 calendar months of operations or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours specified in the following table.

<u>Month</u>	<u>Maximum Allowable Cumulative Operating Hours (P105 and P106 combined)</u>
1	1000
1-2	2000
1-3	3000
1-4	4000
1-5	5000
1-6	6000
1-7	7000
1-8	8000
1-9	9000
1-10	9000
1-11	9000
1-12	9000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the combined annual limitation shall be based upon a rolling, 12-month summation of the monthly operating hours.

III. Monitoring and/or Recordkeeping Requirements

1. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
 - a. the location and color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emission incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

2. For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.
3. The permittee shall install and maintain a device (hour meter) capable of tracking the total hours of operation of the engine.
4. For each day during which the permittee burns a fuel other than digester gas and/or natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
5. The permittee shall collect a representative sample for the digester gas that is burned in this emissions unit.

Sampling shall be performed initially on a quarterly basis. (The permittee may petition the Director to reduce testing frequency based on sampling records.) The permittee shall perform analyses of each digester gas sample for sulfur content, heat content and density in accordance with the appropriate ASTM methods. Alternate, equivalent test methods may be used upon written approval by the Toledo Division of Environmental Services.

6. The permittee shall maintain monthly records of the following information:
 - a. the operating hours of this emissions unit and of P106 for each month; and
 - b. beginning after the first 12 calendar months following the issuance of this permit, the permittee shall record the rolling, 12- month summation of the combined operating hours for P105 and P106.

Also, during the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative operating hours for P105 and P106 combined for each calendar month.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports that:
 - a.
 - i. identify all days during which any visible particulate emissions were observed from the digester gas generator serving this emissions unit;
 - ii. describe any corrective actions taken to minimize or eliminate the visible particulate;
 - iii. identify each day during which an inspection was not performed by the required frequency.
2. The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month combined operating hours limitation for P105 & P106. For the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative combined operating hours for P105 and P106. These reports shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit.
3. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas and/or digester gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation(s) occurs.
4. The permittee shall submit, on a quarterly basis, copies of the permittee's analyses performed during the previous 3 calendar months for the digester gas burned in this emissions unit. The permittees' analyses shall document the sulfur content (percent by volume), heat content (Btu/cuft) and calculated sulfur dioxide emission rate (lb/mmBtu) for each sample.
5. If no deviations occurred during the calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that period. All deviation reports shall be submitted in accordance with the General Terms and Conditions of this permit by January 31, April 30, July 31, and October 31.

V. Testing Requirements

1. Compliance with the emissions limitations in section A.1 of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emissions Limitation:

Visible particulate emissions shall not exceed 20 percent opacity as a six-minute average, except as specified by the rule.

Applicable Compliance Method:

Compliance shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

b. Emissions Limitation:

The emissions of NO_x shall not exceed 6.36 pounds per hour.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit at the maximum operating load of 1.6MW. Compliance may be demonstrated through calculations performed as follows: multiply the manufacturer's supplied emission factor (1 g/hp-hr) by the maximum operating horsepower (2889 hp) and divide by 454 g/lb.

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 4 and 7E of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

c. Emissions Limitation:

The emissions of NO_x shall not exceed 27.86 tons per year.

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit at a maximum operating rate of 8760 hours per year. Compliance may be demonstrated through calculations performed as follows: multiply the hourly allowable emissions rate (6.36 lbs/hr NO_x) by the 8760 hours of operation and divide by 2,000 pounds per ton.

d. Emissions Limitation:

PE emissions shall not exceed 0.062 pound per mmBtu of actual heat input.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(10). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

e. Emission Limitation

VOC emissions shall not exceed 3.88 pound per hour

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit at the maximum operating load of 1.6MW. Compliance may be demonstrated through calculations performed as follows: multiply the manufacturer's supplied emission factor (0.61 g/hp-hr) by the maximum operating horsepower (2889 hp) and divide by 454 g/lb.

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 4 and 25 or 25A of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-21-10. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

f. Emission Limitation

VOC emissions shall not exceed 16.99 ton per year

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit at a maximum total operating rate of 8760 hours per year. Compliance may be demonstrated through calculations performed as follows: multiply the hourly allowable emissions rate (3.88 lbs/hr VOC) by 8760 hours of operation and divide by 2,000 pounds per ton.

g. Emission Limitation:

CO emissions shall not exceed 15.02 pound per hour

Applicable Compliance Method

This emission limitation was established to reflect the potential to emit for this emissions unit at the maximum operating load of 1.6MW. Compliance may be demonstrated through calculations performed as follows: multiply the manufacturer's supplied emission factor (2.36 g/hp-hr) by the maximum operating horsepower (2889 hp) and divide by 454 g/lb.

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

h. Emission Limitation:

CO emissions shall not exceed 65.78 tons per year

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit at a maximum total operating rate of 8760 hours per year. Compliance may be demonstrated through calculations performed as follows: multiply the hourly allowable emissions rate (15.02 lbs/hr CO) by 8760 hours of operation and divide by 2,000 pounds per ton.

i. Emission Limitation

SO₂ emissions shall not exceed 6.72 lbs/hr

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit at the maximum operation load of 1.6MW while burning digester gas. Compliance may be demonstrated through calculations performed as follows: Multiply the maximum heat input for digester gas, 13.43 mmBtu/hr by the maximum sulfur content, 0.5 lb/mmBtu.

If required, the permittee shall demonstrate compliance with this emissions limitation using Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

j. Emission Limitation:

SO₂ emissions shall not exceed 29.43 ton/yr

Applicable Compliance Method:

This emission limitation was established to reflect the potential to emit for this emissions unit at a maximum total operating rate of 8760 hours per year. Compliance may be demonstrated through calculations performed as follows: multiply the hourly allowable emissions rate (6.72 lbs/hr SO₂) by the 8760 hours of operation limitation and divide by 2,000 pounds per ton.

k. Emission Limitation:

The combined emissions from P105 and P106 shall not exceed 28.64 tons per year of NO_x as a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the actual combined hours of operation of P105 and P106 as recorded under Section III.6 by the allowable hourly emissions rate (6.36 lb/hr) and dividing by 2000 pounds per ton.

I. Emission Limitation:

The combined emissions from P105 and P106 shall not exceed 67.59 tons per year of CO as a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the actual combined hours of operation of P105 and P106 as recorded under Section III.6 by the allowable hourly emissions rate (15.02 lb/hr) and dividing by 2000 pounds per ton.

m. Emission Limitation:

The combined emissions from P105 and P106 shall not exceed 17.46 tons per year of VOC as a rolling, 12-month summation of the monthly emissions

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the actual combined hours of operation of P105 and P106 as recorded under Section III.6 by the allowable hourly emissions rate (3.88 lb/hr) and dividing by 2000 pounds per ton.

n. Emission Limitation:

The combined emissions from P105 and P106 shall not exceed 30.24 tons per year of SO₂ as a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

Compliance may be demonstrated by multiplying the actual combined hours of operation of P105 and P106 as recorded under Section III.6 by the allowable hourly emissions rate (6.72 lb/hr) and dividing by 2000 pounds per ton.

o. Emission Limitation:

SO₂ emissions shall not exceed 0.5 lb/mmBtu

Applicable Compliance Method

If required, the permittee shall demonstrate compliance using the procedures specified in OAC rule

City of Toledo/Div.of Water Reclamation
PTI Application: 04-01475
Issued: To be entered upon final issuance

Facility ID: 0448010737
Emissions Unit ID: P106

3745-18-04(E) and 3745-18-04(F)(3). Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

VI. Miscellaneous Requirements

1. Upon issuance of this permit, all terms and conditions shall be federally enforceable.

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.

Operations, Property, and/or Equipment - (P106) - 2889 HP(natural gas) and 2233 HP(digester gas) generator, Engine Generator No. 6

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
OAC rule 3745-31-05	Limit(s)

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

None

VI. Miscellaneous Requirements

None