



State of Ohio Environmental Protection Agency

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P.O. Box 1049
Columbus, OH 43216-1049

10/31/00

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

14-09-01-0043
Sorg Paper Company, The
Dennis M. Urbanek
Wausau-Mosinee Paper Corporation
1244 Kronenwetter Dr.
Mosinee, WI 54455-9099

Dear Dennis M. Urbanek:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Hamilton County Dept. of Environmental Services within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled.

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions or comments concerning this draft Title V permit, please contact Hamilton County Dept. of Environmental Services.

Very truly yours,

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

cc: USEPA
Jim Orlemann, DAPC Engineering
Michael Ahern, DAPC PMU
Hamilton County Dept. of Environmental Services
Indiana
Kentucky



Ohio EPA

State of Ohio Environmental Protection Agency

TITLE V PERMIT

Issue Date: 10/31/00

DRAFT

Effective Date:

Expiration Date:

This document constitutes issuance to:

Sorg Paper Company, The
1244 Kronenwetter Drive
Mosinee, WI 54455-1479

of a Title V permit for Facility ID: 14-09-01-0043

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:
B001 (Boiler No. 1 (MHI))
Boiler No. 1 (MHI)

B002 (Boiler No. 2 (MHI))
Boiler No. 2 (MHI)

B003 (Boiler No. 3 (MHI))
Boiler No. 3 (MHI)

B004 (Boiler No. 4 (MHI))
Boiler No. 4 (MHI)

F002 (Ash Handling (MHI))
Ash Handling (MHI)

F003 (Coal Handling (MHI))
Coal Handling System, Coal Storage Unloading/Conveying System

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-04(A) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Rd
Cincinnati, OH 45219-2660
(513) 946-7777

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

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 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.8 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.

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.

10. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. 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.

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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 annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
- 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.

13. Permit Shield

- a. Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.
- b. This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. 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.

16. Off Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

- a. The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition;
- b. The permittee provides contemporaneous written notice of the change to the director and the administrator, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change;
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F);
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes; and
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit to install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For further clarification, the permittee can refer to Engineering Guide #63 that is available in their STARSHIP software package.)

17. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

B. State Only Enforceable Section

1. Permit to Install Requirement

Prior to the “installation” or “modification” of any “air contaminant source,” as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

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. 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.

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforcable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

T035 (2) 16,000-gallon Fuel Oil Tanks (MHI); and
Z020 20-gallon Parts Washer (MHI).

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler No. 1 (MHI) (B001)
Activity Description: Boiler No. 1 (MHI)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
95 MMBtu/hr coal/No. 2 fuel oil-fired boiler with cyclone and scrubber - Boiler 1	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)	Particulate emissions (PE) shall not exceed .020 pound per MMBtu of actual heat input when firing No. 2 fuel oil.
	OAC rule 3745-17-10(C)	0.13 lb PE/MMBtu of actual heat input (based on a total combined heat input of 459 MMBtu/hr from B001-B004) when firing coal
	OAC rule 3745-18-15(F)	1.40 lbs SO ₂ /MMBtu of actual heat input
		See Section A.I.2.a.

2. Additional Terms and Conditions

- 2.a This emissions unit shall be vented to a stack no lower than two hundred feet above ground level*.

*In accordance with OAC rule 3745-18-03(C)(6)(b)(x), the permittee shall comply with this requirement no later than March 18, 2003.
- 2.b The permittee shall comply with the compliance time schedules specified in OAC rules 3745-18-03(C)(6)(b)(i), (iii), (iv), (v), (vi), (ix), and (x).
- 2.c The permittee is required to operate the wet scrubber only when burning coal.

II. Operational Restrictions

1. The quality of the coal received for burning in this emissions unit shall have a combination of sulfur content and heat content, on an "as-received", wet basis, which is sufficient to comply with the allowable sulfur dioxide emission limitation.
2. The quality of the oil burned in this emissions unit shall have a combination of heat and sulfur content, on an "as-received" basis, which is sufficient to comply with the allowable sulfur dioxide emission limitation.

II. Operational Restrictions (continued)

3. The permittee shall burn only No. 2 fuel oil in this emissions unit, when coal is not burned.
4. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 8 inches of water at all times while the emissions unit is in operation, when coal is burned.

The scrubber water flow rate shall be continuously maintained at a value, in gallons per minute, of not less than the minimum value established during the most recent emission test that demonstrated compliance with the PE emission limit*. The scrubber water flow rate shall be continuously maintained at or above this value at all times while the emissions unit is in operation, when coal is burned.

* The equipment to continuously monitor and record the scrubber water flow rate while the emissions unit is in operation, when coal is burned, shall be installed prior to the emission testing required within 3 months after issuance of this permit (see Section A.V.2). The scrubber water flow rate shall be recorded on a daily basis after the installation of this equipment is completed.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than coal or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content and heat content shall be: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Iso-peribol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

3. The permittee shall maintain monthly records of the total quantity of coal received, the results of the analyses for sulfur content, and heat content, the average SO₂ emission rate for the month, in lbs, and the average SO₂ emission rate for the month, in lbs/MMBtu of actual heat input. The SO₂ emission rate shall be calculated by methods specified in OAC rule 3745-18-04.
4. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.
5. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, the SO₂ emission rate in lbs, and the SO₂ emission rate in lbs/MMBtu of actual heat input. The SO₂ emission rate shall be calculated by methods specified in OAC rule 3745-18-04.

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and shall properly install*, operate and maintain equipment to continuously monitor the scrubber water flow rate while the emissions unit is in operation, when coal is burned. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The pressure drop across the scrubber, in inches of water, on a once per shift basis.
- b. The scrubber water flow rate*, in gallons per minute, on a once per shift basis.
- c. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

* The equipment to continuously monitor and record the scrubber water flow rate while the emissions unit is in operation, when coal is burned, shall be installed prior to the emission testing required within 3 months after issuance of this permit (see Section A.V.2). The scrubber water flow rate shall be recorded on a daily basis after the installation of this equipment is completed.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than coal or No. 2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. Quarterly reports shall be submitted concerning the quantity and quality of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
 - a. The total quantity of coal received (tons).
 - b. The average sulfur content (percent by weight) of the coal received.
 - c. The average heat content (Btu/pound) of the coal received.
 - d. The average SO₂ emission rate (lbs SO₂/MMBtu of actual heat input) for the coal received.
3. The permittee shall submit, on a quarterly basis, copies or summaries of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent), heat content (Btu/gallon), and SO₂ emission rate (pounds/MMBtu) for each shipment of oil. The following information shall also be included with the copies or summaries of the permittee's or oil supplier's analyses:
 - a. The total quantity of oil received in each shipment (gallons).
 - b. The weighted* average sulfur content (percent by weight) of the oil received during each calendar month.
 - c. The weighted* average heat content (Btu/gallon) of the oil received during each calendar month.
 - d. The weighted* average SO₂ emission rate (pounds/MMBtu) for the oil received during each calendar month.

*In proportion to the quantity of oil received in each shipment during the calendar month.

IV. Reporting Requirements (continued)

4. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
 - a. The static pressure drop across the scrubber.
 - b. The scrubber water flow rate.

The deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

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

- 1.b Emission Limitation:
PE shall not exceed .020 pound per MMBtu of actual heat input when firing No. 2 fuel oil.

Applicable Compliance Method:

Compliance may be determined by multiplying an emission factor of 2.0 lbs of particulates/1000 gallons of oil fired by the emissions unit's maximum hourly fuel oil firing capacity (100 gallons/hr) and dividing by the emissions unit's rated heat input capacity (95 MMBtu/hr). This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

2. Emission Limitation:
0.13 lb PE/MMBtu of actual heat input (based on a total combined heat input of 459 MMBtu/hr from B001-B004) when firing coal

Applicable Compliance Method:

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

- a. The emission testing shall be conducted within 3 months after issuance of this permit, approximately 2.5 years after permit issuance, and within 6 months prior to permit renewal.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of 0.13 lb PE/MMBtu of actual heat input, when burning coal.
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate:

40 CFR Part 60, Appendix A, Methods 1-5.

- d. The test 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.

V. Testing Requirements (continued)

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, and the person(s) who will be conducting the test. 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.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test, 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 shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

3. Emission Limitation:
1.40 lbs SO₂/MMBtu of actual heat input

Applicable Compliance Method:

Except as provided below, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil and the sulfur content of each monthly composite sample of coal meets the limitation.

- a. If the sulfur content of each shipment of oil received during a calendar month does not comply with the allowable emission limitation on an "as-received" basis, compliance with the allowable sulfur dioxide emission limitation shall be based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments of oil during the calendar month.
- b. Compliance with the allowable sulfur dioxide emission limitation may be based upon the proportioned* sulfur dioxide emission rates from the total quantity of oil and coal burned during the calendar month if either:
 - i. the volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments of oil during the calendar month does not comply with the allowable emission limitation; or
 - ii. the sulfur dioxide emission rate for the monthly composite sample of coal does not comply with the allowable emission limitation.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

*The proportioned sulfur dioxide emission rate is based on the individual heat inputs from oil and coal relative to the total heat input to the emissions unit and is calculated as follows:

$$\frac{[(\text{average SO}_2 \text{ emission rate for the month, in lbs, for coal}) + (\text{the sum of the SO}_2 \text{ emission rates, in lbs, for all shipments of oil})]}{[(\text{average heat content, in Btu/pound, of the monthly composite sample of coal}) \times (\text{the total quantity of coal received, in lbs}) + (\text{the sum of (the heat content, in Btu/gallon, for each shipment of oil}) \times (\text{the total quantity of oil received in each shipment, in gallons})]}$$

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

1. None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler No. 2 (MHI) (B002)
Activity Description: Boiler No. 2 (MHI)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
95 MMBtu/hr coal/No. 2 fuel oil-fired boiler with cyclone and scrubber - Boiler 2	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)	Particulate emissions (PE) shall not exceed .020 pound per MMBtu of actual heat input when firing No. 2 fuel oil.
	OAC rule 3745-17-10(C)	0.13 lb PE/MMBtu of actual heat input (based on a total combined heat input of 459 MMBtu/hr from B001-B004) when firing coal
	OAC rule 3745-18-15(F)	1.40 lbs SO ₂ /MMBtu of actual heat input
		See Section A.I.2.a.

2. Additional Terms and Conditions

- 2.a** This emissions unit shall be vented to a stack no lower than two hundred feet above ground level*.

*In accordance with OAC rule 3745-18-03(C)(6)(b)(x), the permittee shall comply with this requirement no later than March 18, 2003.
- 2.b** The permittee shall comply with the compliance time schedules specified in OAC rules 3745-18-03(C)(6)(b)(i), (iii), (iv), (v), (vi), (ix), and (x).
- 2.c** The permittee is required to operate the wet scrubber only when burning coal.

II. Operational Restrictions

1. The quality of the coal received for burning in this emissions unit shall have a combination of sulfur content and heat content, on an "as-received", wet basis, which is sufficient to comply with the allowable sulfur dioxide emission limitation.
2. The quality of the oil burned in this emissions unit shall have a combination of heat and sulfur content, on an "as-received" basis, which is sufficient to comply with the allowable sulfur dioxide emission limitation.

II. Operational Restrictions (continued)

3. The permittee shall burn only No. 2 fuel oil in this emissions unit, when coal is not burned.
4. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 8 inches of water at all times while the emissions unit is in operation, when coal is burned.

The scrubber water flow rate shall be continuously maintained at a value, in gallons per minute, of not less than the minimum value established during the most recent emission test that demonstrated compliance with the PE emission limit*. The scrubber water flow rate shall be continuously maintained at or above this value at all times while the emissions unit is in operation, when coal is burned.

* The equipment to continuously monitor and record the scrubber water flow rate while the emissions unit is in operation, when coal is burned, shall be installed prior to the emission testing required within 3 months after issuance of this permit (see Section A.V.2). The scrubber water flow rate shall be recorded on a daily basis after the installation of this equipment is completed.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than coal or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content and heat content shall be: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Iso-peribol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

3. The permittee shall maintain monthly records of the total quantity of coal received, the results of the analyses for sulfur content, and heat content, the average SO₂ emission rate for the month, in lbs, and the average SO₂ emission rate for the month, in lbs/MMBtu of actual heat input. The SO₂ emission rate shall be calculated by methods specified in OAC rule 3745-18-04.
4. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.
5. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, the SO₂ emission rate in lbs, and the SO₂ emission rate in lbs/MMBtu of actual heat input. The SO₂ emission rate shall be calculated by methods specified in OAC rule 3745-18-04.

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and shall properly install*, operate and maintain equipment to continuously monitor the scrubber water flow rate while the emissions unit is in operation, when coal is burned. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The pressure drop across the scrubber, in inches of water, on a once per shift basis.
- b. The scrubber water flow rate*, in gallons per minute, on a once per shift basis.
- c. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

* The equipment to continuously monitor and record the scrubber water flow rate while the emissions unit is in operation, when coal is burned, shall be installed prior to the emission testing required within 3 months after issuance of this permit (see Section A.V.2). The scrubber water flow rate shall be recorded on a daily basis after the installation of this equipment is completed.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than coal or No. 2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. Quarterly reports shall be submitted concerning the quantity and quality of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
 - a. The total quantity of coal received (tons).
 - b. The average sulfur content (percent by weight) of the coal received.
 - c. The average heat content (Btu/pound) of the coal received.
 - d. The average SO₂ emission rate (lbs SO₂/MMBtu of actual heat input) for the coal received.
3. The permittee shall submit, on a quarterly basis, copies or summaries of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent), heat content (Btu/gallon), and SO₂ emission rate (pounds/MMBtu) for each shipment of oil. The following information shall also be included with the copies or summaries of the permittee's or oil supplier's analyses:
 - a. The total quantity of oil received in each shipment (gallons).
 - b. The weighted* average sulfur content (percent by weight) of the oil received during each calendar month.
 - c. The weighted* average heat content (Btu/gallon) of the oil received during each calendar month.
 - d. The weighted* average SO₂ emission rate (pounds/MMBtu) for the oil received during each calendar month.

*In proportion to the quantity of oil received in each shipment during the calendar month.

IV. Reporting Requirements (continued)

4. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
 - a. The static pressure drop across the scrubber.
 - b. The scrubber water flow rate.

The deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

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

- 1.b Emission Limitation:
PE shall not exceed .020 pound per MMBtu of actual heat input when firing No. 2 fuel oil.

Applicable Compliance Method:

Compliance may be determined by multiplying an emission factor of 2.0 lbs of particulates/1000 gallons of oil fired by the emissions unit's maximum hourly fuel oil firing capacity (100 gallons/hr) and dividing by the emissions unit's rated heat input capacity (95 MMBtu/hr). This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

2. Emission Limitation:
0.13 lb PE/MMBtu of actual heat input (based on a total combined heat input of 459 MMBtu/hr from B001-B004) when firing coal

Applicable Compliance Method:

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

- a. The emission testing shall be conducted within 3 months after issuance of this permit, approximately 2.5 years after permit issuance, and within 6 months prior to permit renewal.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of 0.13 lb PE/MMBtu of actual heat input, when burning coal.
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate:

40 CFR Part 60, Appendix A, Methods 1-5.

- d. The test 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.

V. Testing Requirements (continued)

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, and the person(s) who will be conducting the test. 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.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test, 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 shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

3. Emission Limitation:
1.40 lbs SO₂/MMBtu of actual heat input

Applicable Compliance Method:

Except as provided below, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil and the sulfur content of each monthly composite sample of coal meets the limitation.

- a. If the sulfur content of each shipment of oil received during a calendar month does not comply with the allowable emission limitation on an "as-received" basis, compliance with the allowable sulfur dioxide emission limitation shall be based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments of oil during the calendar month.
- b. Compliance with the allowable sulfur dioxide emission limitation may be based upon the proportioned* sulfur dioxide emission rates from the total quantity of oil and coal burned during the calendar month if either:
 - i. the volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments of oil during the calendar month does not comply with the allowable emission limitation; or
 - ii. the sulfur dioxide emission rate for the monthly composite sample of coal does not comply with the allowable emission limitation.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

*The proportioned sulfur dioxide emission rate is based on the individual heat inputs from oil and coal relative to the total heat input to the emissions unit and is calculated as follows:

$$\frac{[(\text{average SO}_2 \text{ emission rate for the month, in lbs, for coal}) + (\text{the sum of the SO}_2 \text{ emission rates, in lbs, for all shipments of oil})]}{[(\text{average heat content, in Btu/pound, of the monthly composite sample of coal}) \times (\text{the total quantity of coal received, in lbs}) + (\text{the sum of (the heat content, in Btu/gallon, for each shipment of oil}) \times (\text{the total quantity of oil received in each shipment, in gallons})]}$$

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

1. None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler No. 3 (MHI) (B003)
Activity Description: Boiler No. 3 (MHI)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
95 MMBtu/hr coal/No. 2 fuel oil-fired boiler with cyclone and scrubber - Boiler 3	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)	Particulate emissions (PE) shall not exceed .020 pound per MMBtu of actual heat input when firing No. 2 fuel oil.
	OAC rule 3745-17-10(C)	0.13 lb PE/MMBtu of actual heat input (based on a total combined heat input of 459 MMBtu/hr from B001-B004) when firing coal
	OAC rule 3745-18-15(F)	1.40 lbs SO ₂ /MMBtu of actual heat input
		See Section A.I.2.a.

2. Additional Terms and Conditions

- 2.a** This emissions unit shall be vented to a stack no lower than two hundred feet above ground level*.

*In accordance with OAC rule 3745-18-03(C)(6)(b)(x), the permittee shall comply with this requirement no later than March 18, 2003.
- 2.b** The permittee shall comply with the compliance time schedules specified in OAC rules 3745-18-03(C)(6)(b)(i), (iii), (iv), (v), (vi), (ix), and (x).
- 2.c** The permittee is required to operate the wet scrubber only when burning coal.

II. Operational Restrictions

1. The quality of the coal received for burning in this emissions unit shall have a combination of sulfur content and heat content, on an "as-received", wet basis, which is sufficient to comply with the allowable sulfur dioxide emission limitation.
2. The quality of the oil burned in this emissions unit shall have a combination of heat and sulfur content, on an "as-received" basis, which is sufficient to comply with the allowable sulfur dioxide emission limitation.

II. Operational Restrictions (continued)

3. The permittee shall burn only No. 2 fuel oil in this emissions unit, when coal is not burned.
4. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 8 inches of water at all times while the emissions unit is in operation, when coal is burned.

The scrubber water flow rate shall be continuously maintained at a value, in gallons per minute, of not less than the minimum value established during the most recent emission test that demonstrated compliance with the PE emission limit*. The scrubber water flow rate shall be continuously maintained at or above this value at all times while the emissions unit is in operation, when coal is burned.

* The equipment to continuously monitor and record the scrubber water flow rate while the emissions unit is in operation, when coal is burned, shall be installed prior to the emission testing required within 3 months after issuance of this permit (see Section A.V.2). The scrubber water flow rate shall be recorded on a daily basis after the installation of this equipment is completed.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than coal or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content and heat content shall be: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Isothermal Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

3. The permittee shall maintain monthly records of the total quantity of coal received, the results of the analyses for sulfur content, and heat content, the average SO₂ emission rate for the month, in lbs, and the average SO₂ emission rate for the month, in lbs/MMBtu of actual heat input. The SO₂ emission rate shall be calculated by methods specified in OAC rule 3745-18-04.
4. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.
5. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, the SO₂ emission rate in lbs, and the SO₂ emission rate in lbs/MMBtu of actual heat input. The SO₂ emission rate shall be calculated by methods specified in OAC rule 3745-18-04.

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and shall properly install*, operate and maintain equipment to continuously monitor the scrubber water flow rate while the emissions unit is in operation, when coal is burned. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The pressure drop across the scrubber, in inches of water, on a once per shift basis.
- b. The scrubber water flow rate*, in gallons per minute, on a once per shift basis.
- c. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

* The equipment to continuously monitor and record the scrubber water flow rate while the emissions unit is in operation, when coal is burned, shall be installed prior to the emission testing required within 3 months after issuance of this permit (see Section A.V.2). The scrubber water flow rate shall be recorded on a daily basis after the installation of this equipment is completed.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than coal or No. 2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. Quarterly reports shall be submitted concerning the quantity and quality of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
 - a. The total quantity of coal received (tons).
 - b. The average sulfur content (percent by weight) of the coal received.
 - c. The average heat content (Btu/pound) of the coal received.
 - d. The average SO₂ emission rate (lbs SO₂/MMBtu of actual heat input) for the coal received.
3. The permittee shall submit, on a quarterly basis, copies or summaries of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent), heat content (Btu/gallon), and SO₂ emission rate (pounds/MMBtu) for each shipment of oil. The following information shall also be included with the copies or summaries of the permittee's or oil supplier's analyses:
 - a. The total quantity of oil received in each shipment (gallons).
 - b. The weighted* average sulfur content (percent by weight) of the oil received during each calendar month.
 - c. The weighted* average heat content (Btu/gallon) of the oil received during each calendar month.
 - d. The weighted* average SO₂ emission rate (pounds/MMBtu) for the oil received during each calendar month.

*In proportion to the quantity of oil received in each shipment during the calendar month.

IV. Reporting Requirements (continued)

4. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
 - a. The static pressure drop across the scrubber.
 - b. The scrubber water flow rate.

The deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

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

- 1.b Emission Limitation:
PE shall not exceed .020 pound per MMBtu of actual heat input when firing No. 2 fuel oil.

Applicable Compliance Method:

Compliance may be determined by multiplying an emission factor of 2.0 lbs of particulates/1000 gallons of oil fired by the emissions unit's maximum hourly fuel oil firing capacity (100 gallons/hr) and dividing by the emissions unit's rated heat input capacity (95 MMBtu/hr). This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

2. Emission Limitation:
0.13 lb PE/MMBtu of actual heat input (based on a total combined heat input of 459 MMBtu/hr from B001-B004) when firing coal

Applicable Compliance Method:

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

- a. The emission testing shall be conducted within 3 months after issuance of this permit, approximately 2.5 years after permit issuance, and within 6 months prior to permit renewal.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of 0.13 lb PE/MMBtu of actual heat input, when burning coal.
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate:

40 CFR Part 60, Appendix A, Methods 1-5.

- d. The test 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.

V. Testing Requirements (continued)

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, and the person(s) who will be conducting the test. 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.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test, 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 shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

3. Emission Limitation:
1.40 lbs SO₂/MMBtu of actual heat input

Applicable Compliance Method:

Except as provided below, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil and the sulfur content of each monthly composite sample of coal meets the limitation.

- a. If the sulfur content of each shipment of oil received during a calendar month does not comply with the allowable emission limitation on an "as-received" basis, compliance with the allowable sulfur dioxide emission limitation shall be based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments of oil during the calendar month.
- b. Compliance with the allowable sulfur dioxide emission limitation may be based upon the proportioned* sulfur dioxide emission rates from the total quantity of oil and coal burned during the calendar month if either:
 - i. the volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments of oil during the calendar month does not comply with the allowable emission limitation; or
 - ii. the sulfur dioxide emission rate for the monthly composite sample of coal does not comply with the allowable emission limitation.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

*The proportioned sulfur dioxide emission rate is based on the individual heat inputs from oil and coal relative to the total heat input to the emissions unit and is calculated as follows:

$$\frac{[(\text{average SO}_2 \text{ emission rate for the month, in lbs, for coal}) + (\text{the sum of the SO}_2 \text{ emission rates, in lbs, for all shipments of oil})]}{[(\text{average heat content, in Btu/pound, of the monthly composite sample of coal}) \times (\text{the total quantity of coal received, in lbs}) + (\text{the sum of (the heat content, in Btu/gallon, for each shipment of oil}) \times (\text{the total quantity of oil received in each shipment, in gallons})]}$$

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

1. None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Boiler No. 4 (MHI) (B004)
Activity Description: Boiler No. 4 (MHI)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
174 MMBtu/hr coal/No. 2 fuel oil-fired boiler with cyclone and scrubber - Boiler 4	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)	Particulate emissions (PE) shall not exceed .020 pound per MMBtu of actual heat input when firing No. 2 fuel oil.
	OAC rule 3745-17-10(C)	0.13 lb PE/MMBtu of actual heat input (based on a total combined heat input of 459 MMBtu/hr from B001-B004) when firing coal
	OAC rule 3745-18-15(F)	1.40 lbs SO ₂ /MMBtu of actual heat input
		See Section A.I.2.a.

2. Additional Terms and Conditions

- 2.a** This emissions unit shall be vented to a stack no lower than two hundred feet above ground level*.

*In accordance with OAC rule 3745-18-03(C)(6)(b)(x), the permittee shall comply with this requirement no later than March 18, 2003.
- 2.b** The permittee shall comply with the compliance time schedules specified in OAC rules 3745-18-03(C)(6)(b)(i), (iii), (iv), (v), (vi), (ix), and (x).
- 2.c** The permittee is required to operate the wet scrubber only when burning coal.

II. Operational Restrictions

1. The quality of the coal received for burning in this emissions unit shall have a combination of sulfur content and heat content, on an "as-received", wet basis, which is sufficient to comply with the allowable sulfur dioxide emission limitation.
2. The quality of the oil burned in this emissions unit shall have a combination of heat and sulfur content, on an "as-received" basis, which is sufficient to comply with the allowable sulfur dioxide emission limitation.

II. Operational Restrictions (continued)

3. The permittee shall burn only No. 2 fuel oil in this emissions unit, when coal is not burned.
4. The pressure drop across the scrubber shall be continuously maintained at a value of not less than 8 inches of water at all times while the emissions unit is in operation, when coal is burned.

The scrubber water flow rate shall be continuously maintained at a value, in gallons per minute, of not less than the minimum value established during the most recent emission test that demonstrated compliance with the PE emission limit*. The scrubber water flow rate shall be continuously maintained at or above this value at all times while the emissions unit is in operation, when coal is burned.

* The equipment to continuously monitor and record the scrubber water flow rate while the emissions unit is in operation, when coal is burned, shall be installed prior to the emission testing required within 3 months after issuance of this permit (see Section A.V.2). The scrubber water flow rate shall be recorded on a daily basis after the installation of this equipment is completed.

III. Monitoring and/or Record Keeping Requirements

1. For each day during which the permittee burns a fuel other than coal or No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
2. The permittee shall collect a representative sample of each shipment of coal which is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal which were received during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content and heat content shall be: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D2015, Gross Calorific Value of Solid Fuel by the Adiabatic Bomb Calorimeter, ASTM method D3286, Gross Calorific Value of Coal and Coke by the Isothermal Bomb Calorimeter, or ASTM method D1989, Standard Test Method for Gross Calorific Value of Coal and Coke by Microprocessor Controlled Iso-peribol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval from the appropriate Ohio EPA District Office or local air agency.

3. The permittee shall maintain monthly records of the total quantity of coal received, the results of the analyses for sulfur content, and heat content, the average SO₂ emission rate for the month, in lbs, and the average SO₂ emission rate for the month, in lbs/MMBtu of actual heat input. The SO₂ emission rate shall be calculated by methods specified in OAC rule 3745-18-04.
4. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.
5. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, the SO₂ emission rate in lbs, and the SO₂ emission rate in lbs/MMBtu of actual heat input. The SO₂ emission rate shall be calculated by methods specified in OAC rule 3745-18-04.

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall properly operate and maintain equipment to continuously monitor the static pressure drop across the scrubber and shall properly install*, operate and maintain equipment to continuously monitor the scrubber water flow rate while the emissions unit is in operation, when coal is burned. The monitoring devices and any recorders shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.

The permittee shall collect and record the following information each day:

- a. The pressure drop across the scrubber, in inches of water, on a once per shift basis.
- b. The scrubber water flow rate*, in gallons per minute, on a once per shift basis.
- c. The operating times for the capture (collection) system, control device, monitoring equipment, and the associated emissions unit.

* The equipment to continuously monitor and record the scrubber water flow rate while the emissions unit is in operation, when coal is burned, shall be installed prior to the emission testing required within 3 months after issuance of this permit (see Section A.V.2). The scrubber water flow rate shall be recorded on a daily basis after the installation of this equipment is completed.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than coal or No. 2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. Quarterly reports shall be submitted concerning the quantity and quality of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
 - a. The total quantity of coal received (tons).
 - b. The average sulfur content (percent by weight) of the coal received.
 - c. The average heat content (Btu/pound) of the coal received.
 - d. The average SO₂ emission rate (lbs SO₂/MMBtu of actual heat input) for the coal received.
3. The permittee shall submit, on a quarterly basis, copies or summaries of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent), heat content (Btu/gallon), and SO₂ emission rate (pounds/MMBtu) for each shipment of oil. The following information shall also be included with the copies or summaries of the permittee's or oil supplier's analyses:
 - a. The total quantity of oil received in each shipment (gallons).
 - b. The weighted* average sulfur content (percent by weight) of the oil received during each calendar month.
 - c. The weighted* average heat content (Btu/gallon) of the oil received during each calendar month.
 - d. The weighted* average SO₂ emission rate (pounds/MMBtu) for the oil received during each calendar month.

*In proportion to the quantity of oil received in each shipment during the calendar month.

IV. Reporting Requirements (continued)

4. The permittee shall submit quarterly deviation (excursion) reports that identify all periods of time during which the following scrubber parameters were not maintained at or above the required levels:
 - a. The static pressure drop across the scrubber.
 - b. The scrubber water flow rate.

The deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

V. Testing Requirements

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

- 1.a Emission Limitation:
Visible particulate emissions from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.

Applicable Compliance Method:

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

- 1.b Emission Limitation:
PE shall not exceed .020 pound per MMBtu of actual heat input when firing No. 2 fuel oil.

Applicable Compliance Method:

Compliance may be determined by multiplying an emission factor of 2.0 lbs of particulates/1000 gallons of oil fired by the emissions unit's maximum hourly fuel oil firing capacity (100 gallons/hr) and dividing by the emissions unit's rated heat input capacity (174 MMBtu/hr). This emission factor is specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 1.3, Table 1.3-1 (9/98).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures specified in OAC rule 3745-17-03(B)(9).

2. Emission Limitation:
0.13 lb PE/MMBtu of actual heat input (based on a total combined heat input of 459 MMBtu/hr from B001-B004) when firing coal

Applicable Compliance Method:

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

- a. The emission testing shall be conducted within 3 months after issuance of this permit, approximately 2.5 years after permit issuance, and within 6 months prior to permit renewal.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate of 0.13 lb PE/MMBtu of actual heat input, when burning coal.
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rate:

40 CFR Part 60, Appendix A, Methods 1-5.

- d. The test 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.

V. Testing Requirements (continued)

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, and the person(s) who will be conducting the test. 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.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test, 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 shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA District Office or local air agency within 30 days following completion of the test(s).

3. Emission Limitation:
1.40 lbs SO₂/MMBtu of actual heat input

Applicable Compliance Method:

Except as provided below, compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil and the sulfur content of each monthly composite sample of coal meets the limitation.

- a. If the sulfur content of each shipment of oil received during a calendar month does not comply with the allowable emission limitation on an "as-received" basis, compliance with the allowable sulfur dioxide emission limitation shall be based upon a volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments of oil during the calendar month.
- b. Compliance with the allowable sulfur dioxide emission limitation may be based upon the proportioned* sulfur dioxide emission rates from the total quantity of oil and coal burned during the calendar month if either:
 - i. the volume-weighted average of the calculated sulfur dioxide emission rates for all of the shipments of oil during the calendar month does not comply with the allowable emission limitation; or
 - ii. the sulfur dioxide emission rate for the monthly composite sample of coal does not comply with the allowable emission limitation.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

*The proportioned sulfur dioxide emission rate is based on the individual heat inputs from oil and coal relative to the total heat input to the emissions unit and is calculated as follows:

$$\frac{[(\text{average SO}_2 \text{ emission rate for the month, in lbs, for coal}) + (\text{the sum of the SO}_2 \text{ emission rates, in lbs, for all shipments of oil})]}{[(\text{average heat content, in Btu/pound, of the monthly composite sample of coal}) \times (\text{the total quantity of coal received, in lbs}) + (\text{the sum of (the heat content, in Btu/gallon, for each shipment of oil}) \times (\text{the total quantity of oil received in each shipment, in gallons})]}$$

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

1. None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Ash Handling (MHI) (F002)
Activity Description: Ash Handling (MHI)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
load-in and load-out of storage piles (see Section A.1.2.a for identification of storage piles)	OAC rule 3745-17-07 (B)(6)	There shall be no visible particulate emissions from any storage pile except for a period of time not to exceed 13 minutes in any 60-minute observation period.
	OAC rule 3745-17-08 (B), (B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.1.2.b, A.1.2.c and A.1.2.f)
wind erosion from storage piles (see Section A.1.2.a for identification of storage piles)	OAC rule 3745-17-07 (B)(6)	There shall be no visible particulate emissions from any storage pile except for a period of time not to exceed 13 minutes in any 60-minute observation period.
	OAC rule 3745-17-08 (B), (B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.1.2.d through A.1.2.f)

2. Additional Terms and Conditions

- 2.a The storage piles that are covered by this permit and subject to the requirements of OAC rules 3745-17-07 and 3745-17-08 are listed below:

fly ash storage piles

- 2.b The permittee shall employ reasonably available control measures on all load-in and load-out operations associated with the storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to treat the fly ash with water to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2. Additional Terms and Conditions (continued)

- 2.c** The above-mentioned control measure(s) shall be employed for each load-in and load-out operation of each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.
- 2.d** The permittee shall employ reasonably available control measures for wind erosion from the surfaces of all storage piles for the purpose of ensuring compliance with the above-mentioned applicable requirements. In accordance with the permittee's permit application, the permittee has committed to continue to store fly ash sludge in the sludge lagoons and to treat each storage pile with water at sufficient treatment frequencies to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.e** The above-mentioned control measure(s) shall be employed for wind erosion from each pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Implementation of the control measure(s) shall not be necessary for a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.
- 2.f** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- 1.** Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

storage pile identification	minimum load-in inspection frequency
fly ash storage piles	daily
- 2.** Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

storage pile identification	minimum load-out inspection frequency
fly ash storage piles	daily
- 3.** Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

storage pile identification	minimum wind erosion inspection frequency
fly ash storage piles	daily
- 4.** No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
- 5.** The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditions.

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements.
7. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in 7.d. shall be kept separately for (i) the load-in operations, (ii) the load-out operations, and (iii) the pile surfaces (wind erosion), and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

IV. Reporting Requirements

1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency, excluding an inspection which was not performed due to an exemption for snow and/or ice cover or precipitation; and
 - b. each instance when a control measure, that was to be implemented as a result of an inspection, was not implemented.
2. The deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

V. Testing Requirements

1. Compliance with the visible emission limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

VI. Miscellaneous Requirements

None

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Coal Handling (MHI) (F003)

Activity Description: Coal Handling System, Coal Storage Unloading/Conveying System

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
coal unloading, coal conveyors, coal handling, coal crusher and coal transfer points	OAC rule 3745-17-07(B)(1)	Visible particulate emissions shall not exceed 20 percent opacity, as a 3-minute average, except as specified by rule.
	OAC rule 3745-17-08(B)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Sections A.I.2.a through A.I.2.g)
coal storage piles	OAC rule 3745-17-07(B)(6)	There shall be no visible particulate emissions from any storage pile except for a period of time not to exceed 13 minutes in any 60-minute observation period.
	OAC rule 3745-17-08(B)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust (see Section A.I.2.f)

2. Additional Terms and Conditions

- 2.a The permittee shall employ reasonably available control measures on all coal unloading stations, coal conveyors, coal handling operations, and coal transfer points for the purpose of ensuring compliance with the above-mentioned applicable requirements. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.
- 2.b For each coal unloading station and coal handling operation that is not adequately enclosed, such unloading station or handling operation shall be treated with water and/or suitable dust suppression chemicals if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measures are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measures shall continue during operation of any coal unloading station or coal handling until further observation confirms that use of the control measures is unnecessary.
- 2.c The permittee shall employ a two-sided enclosure around the coal unloading station in order to minimize or eliminate fugitive dust emissions.

2. Additional Terms and Conditions (continued)

- 2.d The permittee shall employ and maintain the building enclosure around the coal crusher in order to minimize or eliminate fugitive dust emissions.
- 2.e The permittee shall employ and maintain total enclosure of all conveyor transfer points in order to minimize or eliminate fugitive dust emissions.
- 2.f A wind guard enclosure on the North side of the coal storage piles shall continue to be employed to minimize load-in and wind loss fugitive dust emissions.
- 2.g Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08.

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

- 1. The permittee shall perform daily inspections of the the coal unloading stations, the coal conveyors, the coal handling operations, the coal transfer points, and the coal storage piles. The purpose of the inspections is to determine the need for implementing the control measures specified in this permit. These inspections shall be performed during representative, normal operating conditions.
- 2. No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.
- 3. The permittee may, upon receipt of written approval from the appropriate Ohio EPA District Office or local air agency, modify the above-mentioned inspection frequencies if operating experience indicates that less frequent inspections would be sufficient to ensure compliance with the above-mentioned applicable requirements. Such modified inspection frequencies would not be considered a minor or significant modification that would be subject to the Title V permit modification requirements in paragraphs (C)(1) and (C)(3) of OAC rule 3745-77-08.
- 4. The permittee shall maintain records of the following information:
 - a. the date and reason any required inspection was not performed;
 - b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;
 - c. the dates the control measures were implemented; and
 - d. on a calendar quarter basis, the total number of days the control measures were implemented.

The information in 4.d shall be kept separately for (i) the coal unloading stations, (ii) the coal conveyors, (iii) the coal handling operations, (iv) the coal transfer points, and (v) the coal storage piles, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

IV. Reporting Requirements

- 1. The permittee shall submit quarterly deviation reports that identify any of the following occurrences:
 - a. each day during which an inspection was not performed by the required frequency; and
 - b. each instance when a control measure, that was to be performed as a result of an inspection, was not implemented.

IV. Reporting Requirements (continued)

2. The deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii of this permit.

V. Testing Requirements

1. Compliance with the visible emission limitation for the material handling operation(s) identified above shall be determined in accordance with Test Method 9 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) of OAC rule 3745-17-03.
2. Compliance with the visible emission limitations for the coal storage piles shall be determined in accordance with Test Method 22 as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 1996, and the modifications listed in paragraphs (B)(4)(a) through (B)(4)(c) of OAC rule 3745-17-03.

VI. Miscellaneous Requirements

1. **None**

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may 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>
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2. Additional Terms and Conditions

None

II. Operational Restrictions

1. None

III. Monitoring and/or Record Keeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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