OhioEPA

State of Ohio Environmental Protection Agency

Street Address: 1800 WaterMark Drive, Columbus, OH 43215-1099

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

Mailing Address: P.O. Box 1049, Columbus, OH 43216-1049

12/03/98

CERTIFIED MAIL

RE: Proposed Title V Chapter 3745-77 permit
16-77-01-0757
Akron Thermal Energy Corporation

Attn: Genevieve Damico AR-18J
United States Enviromental Protection Agency
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

Dear Ms. Damico:

The proposed issuance of the Title V permit for Akron Thermal Energy Corporation, has been created in Ohio EPA's State Air Resources System (STARS) on 12/03/98, for review by USEPA. This proposed action is identified in STARS as 3-Title V Proposed Permit T+C covering the facility specific terms and conditions, and Title V Proposed Permit covering the general terms and conditions. This proposed permit will be processed for issuance as a final action after forty-five (45) days from USEPA's receipt of this certified letter if USEPA does not object to the proposed permit. Please contact Mike Ahern, DAPC Permit Management Unit supervisor at (614) 644-3631 by the end of the forty-five (45) day review period if you wish to object to the proposed permit.

Very truly yours,

Thomas G. Rigo

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

cc: Akron Air Pollution Control
Becky Castle, DAPC PMU

OhioEPA

Ohio EPA

State of Ohio Environmental Protection Agency

TITLE V PERMIT

Date: 12/03/98

PROPOSED

Effective Date:

Expiration Date:

This document constitutes issuance to:

Akron Thermal Energy Corporation
226 Opportunity Parkway
Akron, OH 44308

of a Title V permit for Facility ID: 16-77-01-0757

Emissions Unit ID (Company ID)/
Emissions Unit Activity Description:
B001 (Boiler #32)
220 mmBH Spreader Stoker Coal Fired Boiler

B002 (Boiler #31)
267 mmBH Natural Gas Fired Boiler

N001 (Unit #1)
180 mmBH Wood Chip Fired Boiler

N002 (Unit #2)
180 mmBH Natural Gas Fired Boiler

N003 (Unit #3)
180 mmBH Natural Gas Fired Boiler

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:

Akron Air Pollution Control
146 South High Street, Room 904
Akron, OH 44308

(330) 375-2480

OHIO ENVIRONMENTAL PROTECTION AGENCY

_____

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 <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, 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 <u>monitoring</u>, <u>recordkeeping</u>, <u>and reporting requirements</u> 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**

No term or condition specifying a method for demonstrating compliance with any emission limitation or other requirement of this permit shall preclude the use by any person of any credible evidence to establish compliance with or a violation of this permit, the Clean Air Act, or any implementing regulations or rules promulgated thereunder.

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 Enforceable Section

None

B. State Only Enforceable Section

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

Z001 - coal unloading
Z002 - ash removal system

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 #32 (B001)

Activity Description: 220 mmBH Spreader Stoker Coal Fired Boiler

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
220 mmBtu/hr spreader stoker coal fired boiler controlled with a multiclone and an electrostatic precipitator	OAC rule 3745-17-07	See A.I.2.a below.
	OAC rule 3745-17-10	0.158 pound of particulates per million Btu actual heat input
	40 CFR 52.1881(b)(59)(viii)	7.0 pounds of sulfur dioxide per million Btu actual heat input

2. Additional Terms and Conditions

2.a Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, from any stack, except as provided by rule.

II. Operational Restrictions

1. The quality of the coal burned in this emissions unit shall meet the following specifications on an as-burned wet basis:

a. less than 12 percent ash by weight;

b. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 7.0 pounds of sulfur dioxide per million Btu actual heat input; and

c. greater than 12,000 Btu per pound of coal.

Compliance with the above-mentioned specifications shall be on an "as-burned" wet basis and shall be determined by using the analytical results from the composite sample of coal collected during each calendar month.

2. The permittee shall not operate boiler number 27 (B003) simultaneously with boiler number 32 (B001).

Because boiler number 27 (B003) has been shut down, the records necessary to demonstrate compliance with this requirement need not be maintained. This permit will be modified upon completion of any revision to 40 CFR 52.1881(b)(59)(viii).

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect representative grab samples of the coal burned in this emissions unit on a frequency of at least two days per week. Each sample shall be collected from the coal inlet prior to entering the boiler. A sufficient number of samples shall be collected so that each composite sample is representative of the average quality of coal burned in this emissions unit during each calendar day. 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, all of the grab samples which were collected during that calendar month shall be combined into one composite sample.

Each monthly composite sample of coal shall be analyzed for ash content (percent), 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 D3174, Ash in the Analysis of Coal and Coke; 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 Isoperibol Calorimeters, respectively. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

2. The permittee shall maintain records of the results of the composite sample fuel analyses along with coal consumption (lbs or tons) on a calendar month basis.

3. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. Quarterly reports shall be submitted concerning the quality and quantity of the coal burned 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 burned (tons);

b. the average ash content (percent) of the coal burned;

c. the average sulfur content (percent) of the coal burned;

d. the average heat content (Btu/pound) of the coal burned; and

e. the average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal burned.

The reports containing this information shall be submitted on a quarterly basis within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or Local Agency.

2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

1.a Emission Limitation:

0.158 pound of particulates per million BTU actual heat input
7.0 pounds of sulfur dioxide per million BTU actual heat input

Applicable Compliance Method:

Compliance with these emission limitations shall be demonstrated through the records required pursuant to section A.III.1 (for SO2) and the emission testing requirements specified below.

The permittee shall conduct, or have conducted, particulates and sulfur dioxide emission testing for this emissions unit to demonstrate compliance with the 0.158 pound of particulate matter per million BTU actual heat input and 7.0 pounds of sulfur dioxide per million BTU actual heat input emission limitations in accordance with the following requirements:

a. the emission testing shall be conducted within 6 months prior to permit renewal;

b. the following test methods shall be employed to demonstrate compliance with the allowable mass emission rates for particulate matter and sulfur dioxide, respectively: Methods 5 and 6 of 40 CFR Part 60, Appendix A; and

c. the tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Akron RAQMD.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Akron RAQMD. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Akron RAQMD's refusal to accept the results of the emission test(s).

Personnel from the Akron RAQMD shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

1.b Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible emission limitation in OAC rule 3745-17-07(A)(1) shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
220 mmBtu/hr spreader stoker coal fired boiler	OAC rule 3745-18-83(I)	7.0 pounds of sulfur dioxide per million Btu actual heat input See B.II.1 below.

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. Combined average operating rates for boilers numbers 27 and 32 (OEPA emissions units B003 and B001, respectively) shall not exceed the following for any calendar day:

a. first quarter, 360 mmBtu per hour;
b. second quarter, 360 mmBtu per hour;
c. third quarter, 231 mmBtu per hour; and
d. fourth quarter, 360 mmBtu per hour.

Because boiler number 27 (B003) has been shut down and because the maximum heat input for boiler number 32 (B001) is 220 million Btu per hour, the daily combined average operating rates for the first, second, third, and fourth quarters listed above can not be exceeded. Therefore, the records necessary to demonstrate compliance with this requirement need not be maintained. This permit will be modified upon completion of any revision to OAC rule 3745-18-83(I).

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 #31 (B002)

Activity Description: 267 mmBH Natural Gas Fired Boiler

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
267 mmBtu/hr natural gas and oil fired boiler	OAC rule 3745-17-07	See A.I.2.a below.
	OAC rule 3745-17-10	0.020 pound of particulates per million Btu actual heat input
	40 CFR 52.1881(b)(59)(viii)	0.51 pound of sulfur dioxide per million Btu actual heat input when firing with oil

2. Additional Terms and Conditions

2.a Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, from any stack, except as provided by rule.

II. Operational Restrictions

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

a. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.51 pound of sulfur dioxide per million Btu actual heat input; and

b. greater than 139,000 Btu/gallon of oil.

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

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor and record natural gas usage for this emissions unit on a continuous basis.

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

2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received and the permittee's or oil supplier's analyses for sulfur content and heat content.

3. The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;
b. whether the emissions are representative of normal operations;
c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
d. the total duration of any visible emission incident; and
e. any corrective actions taken to eliminate the visible emissions.

IV. Reporting Requirements

1. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permittee's or oil supplier's analyses:

a. the total quantity of oil received in each shipment (gallons);

b. the weighted* average sulfur dioxide emission rate (pounds/mmBtu) for the oil received during each calendar month; and

c. the weighted* average heat content (Btu/gallon) of the oil received during each calendar month.

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

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the oil shipments received during the previous calendar quarters.

If no oil was burned in this emissions unit during the calendar quarter, the permittee shall indicate in the quarterly report that no oil was burned.

2. The permittee shall submit semiannual written reports which (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) by January 31 and July 31 of each year and shall cover the previous 6-month period.

V. Testing Requirements

1. Compliance with the emission limitations in sections A.I.1 and A.I.2 of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

1.a Emission Limitation:

0.020 pound of particulates per million Btu

Applicable Compliance Method:

Particulate emissions shall be calculated using the AP-42 emission factor for particulate emissions resulting from the operation of natural gas and distillate oil fired fuel burning equipment. For natural gas, the filterable particulate emission factor of 6.2 pounds per million cubic feet shall be divided by 1000 Btu per standard cubic foot to calculate a particulate emission rate of 0.0062 pound per million Btu. For distillate oil, the filterable particulate emission factor of 2.0 pounds per thousand gallons shall be divided by 139,000 Btu per gallon to calculate a particulate emission rate of 0.014 pound per million Btu.

The particulate emission factors for natural gas and distillate oil were obtained from AP-42, 5th edition, chapters 1.4 and 1.3, tables 1.4-2 and 1.3-2, respectively.

1.b Emission Limitation:

0.51 pound of sulfur dioxide per million Btu actual heat input

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the records required pursuant to section A.III.2.

1.c Emission Limitation:

20% opacity as a 6-minute average

Applicable Compliance Method:

Compliance with the visible emission limitation in OAC rule 3745-17-07(A)(1) shall be determined in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
267 mmBtu/hr natural gas and oil fired boiler	OAC rule 3745-18-83(I)	0.50 pound of sulfur dioxide per million Btu actual heat input

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

1. Compliance with the emission limitation in section B.I.1 of these terms and conditions shall be determined in accordance with the following method:

1.a Emission Limitation:

0.50 pound of sulfur dioxide per million Btu actual heat input

Applicable Compliance Method:

Compliance with this emission limitation shall be demonstrated through the records required pursuant to section A.III.2.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Unit #1 (N001)

Activity Description: 180 mmBH Wood Chip Fired Boiler

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Babcock and Wilcox two drum Stirling incinerator controlled with an electrostatic precipitator: 180 mmBtu/hr, wood chip fired	OAC rule 3745-31-05 (PTI 16-037 and 16-294)	See A.I.2.a below.
	OAC rule 3745-17-07	See A.I.2.b below.
	OAC rule 3745-17-09	See A.I.2.c below.
	40 CFR 60, Subpart E	0.18 gram of particulates per dry standard cubic meter of exhaust gas (0.08gr/dscf) corrected to 12 percent carbon dioxide

2. Additional Terms and Conditions

2.a The particulate emissions limit based on OAC rule 3745-31-05 is the same as the particulate emissions limit established pursuant to 40 CFR 60, Subpart E.

2.b Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, from any stack, except as provided by rule.

2.c The particulate emissions limit based on OAC rule 3745-17-09 is less stringent than the particulate emissions limit established pursuant to 40 CFR 60, Subpart E.

II. Operational Restrictions

1. The emissions unit, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emissions of objectionable odors.

2. The wood to be incinerated in this emissions unit shall be limited to live tree trimmings and whole, but chipped trees from area land clearing operations. Wood or wood waste from any manufacturing operations or any other operation which coats, treats, or otherwise contaminates the wood or wood waste, is strictly prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (1-minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

The continuous emission monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

2. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

3. The permittee shall record the daily charging rates and hours of operation.

IV. Reporting Requirements

1. The permittee shall submit reports (hardcopy and electronic) within 30 days following the end of each calendar quarter to the Akron Regional Air Quality Management District documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

2. The permittee shall submit quarterly reports to the Akron Regional Air Quality Management District which specify the quantity of wood burned (tons) in this emissions unit for each calendar month during the calendar quarter.

These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, particulate matter testing for this emissions unit to demonstrate compliance with the applicable limitation in accordance with the following requirements:

a. emissions testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit renewal;

b. emission testing shall be conducted in accordance with the test methods and procedures under 40 CFR Part 60.54;

c. emission testing shall be conducted while the emissions unit is operating at or near its capacity, unless otherwise specified or approved by the Akron RAQMD.

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

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

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

2. Compliance with the emission limitations in sections A.I.1 and A.I.2.b of these terms and conditions shall be determined in accordance with the following methods:

2.a Emission Limitation:

0.18 grams of particulates per dry standard cubic meter of exhaust gas (0.08gr/dscf) corrected to 12 percent carbon dioxide

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the test methods and procedures under 40 CFR Part 60.54.

2.b Emission Limitation:

20% opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method:

Compliance with the visible emission limitation in OAC rule 3745-17-07(A)(1) shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Unit #2 (N002)

Activity Description: 180 mmBH Natural Gas Fired Boiler

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Babcock and Wilcox two drum Stirling incinerator controlled with an electrostatic precipitator: 180 mmBtu/hr, natural gas fired	OAC rule 3745-31-05 (PTI 16-037 and 16-294)	See A.I.2.a below.
	OAC rule 3745-17-07	See A.I.2.b below.
	OAC rule 3745-17-09	See A.I.2.c below.
	40 CFR 60, Subpart E	0.18 gram of particulates per dry standard cubic meter of exhaust gas (0.08gr/dscf) corrected to 12 percent carbon dioxide

2. Additional Terms and Conditions

2.a The particulate emissions limit based on OAC rule 3745-31-05 is the same as the particulate emissions limit established pursuant to 40 CFR 60, Subpart E.

2.b Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, from any stack, except as provided by rule.

2.c The particulate emissions limit based on OAC rule 3745-17-09 is less stringent than the particulate emissions limit established pursuant to 40 CFR 60, Subpart E.

II. Operational Restrictions

1. The emissions unit, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emissions of objectionable odors.

2. The wood to be incinerated in this emissions unit shall be limited to live tree trimmings and whole, but chipped trees from area land clearing operations. Wood or wood waste from any manufacturing operations or any other operation which coats, treats, or otherwise contaminates the wood or wood waste, is strictly prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (1-minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

The continuous emission monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

2. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

3. The permittee shall record the daily charging rates and hours of operation.

IV. Reporting Requirements

1. The permittee shall submit reports (hardcopy and electronic) within 30 days following the end of each calendar quarter to the Akron Regional Air Quality Management District documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

2. The permittee shall submit quarterly reports to the Akron Regional Air Quality Management District which specify the quantity of wood burned (tons) in this emissions unit for each calendar month during the calendar quarter.

These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, particulate matter testing for this emissions unit to demonstrate compliance with the applicable limitation in accordance with the following requirements:

a. emissions testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit renewal;

b. emission testing shall be conducted in accordance with the test methods and procedures under 40 CFR Part 60.54;

c. emission testing shall be conducted while the emissions unit is operating at or near its capacity, unless otherwise specified or approved by the Akron RAQMD.

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

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

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

2. Compliance with the emission limitations in sections A.I.1 and A.I.2.b of these terms and conditions shall be determined in accordance with the following methods:

2.a Emission Limitation:

0.18 grams of particulates per dry standard cubic meter of exhaust gas (0.08gr/dscf) corrected to 12 percent carbon dioxide

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the test methods and procedures under 40 CFR Part 60.54.

2.b Emission Limitation:

20% opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method:

Compliance with the visible emission limitation in OAC rule 3745-17-07(A)(1) shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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: Unit #3 (N003)

Activity Description: 180 mmBH Natural Gas Fired Boiler

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Babcock and Wilcox two drum Stirling incinerator controlled with an electrostatic precipitator: 180 mmBtu/hr, natural gas fired	OAC rule 3745-31-05 (PTI 16-037 and 16-294)	See A.I.2.a below.
	OAC rule 3745-17-07	See A.I.2.b below.
	OAC rule 3745-17-09	See A.I.2.c below.
	40 CFR 60, Subpart E	0.18 gram of particulates per dry standard cubic meter of exhaust gas (0.08gr/dscf) corrected to 12 percent carbon dioxide

2. Additional Terms and Conditions

2.a The particulate emissions limit based on OAC rule 3745-31-05 is the same as the particulate emissions limit established pursuant to 40 CFR 60, Subpart E.

2.b Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, from any stack, except as provided by rule.

2.c The particulate emissions limit based on OAC rule 3745-17-09 is less stringent than the particulate emissions limit established pursuant to 40 CFR 60, Subpart E.

II. Operational Restrictions

1. The emissions unit, including all associated equipment and grounds, shall be designed, operated and maintained so as to prevent the emissions of objectionable odors.

2. The wood to be incinerated in this emissions unit shall be limited to live tree trimmings and whole, but chipped trees from area land clearing operations. Wood or wood waste from any manufacturing operations or any other operation which coats, treats, or otherwise contaminates the wood or wood waste, is strictly prohibited.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall operate and maintain existing equipment to continuously monitor and record the opacity of the particulate emissions from this emissions unit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

The permittee shall maintain records of all data obtained by the continuous opacity monitoring system including, but not limited to, percent opacity on an instantaneous (1-minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

The continuous emission monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

2. A statement of certification of the existing continuous opacity monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

3. The permittee shall record the daily charging rates and hours of operation.

IV. Reporting Requirements

1. The permittee shall submit reports (hardcopy and electronic) within 30 days following the end of each calendar quarter to the Akron Regional Air Quality Management District documenting all instances of opacity values in excess of the limitations specified in OAC rule 3745-17-07, detailing the date, commencement and completion times, duration, magnitude (percent opacity), reason (if known), and corrective actions taken (if any) of each 6-minute block average above the applicable opacity limitation(s).

The reports shall also identify any excursions of the start-up and shutdown provisions specified in OAC rule 3745-17-07(A)(3) and document any continuous opacity monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

2. The permittee shall submit quarterly reports to the Akron Regional Air Quality Management District which specify the quantity of wood burned (tons) in this emissions unit for each calendar month during the calendar quarter.

These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

V. Testing Requirements

1. The permittee shall conduct, or have conducted, particulate matter testing for this emissions unit to demonstrate compliance with the applicable limitation in accordance with the following requirements:

a. emissions testing shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit renewal;

b. emission testing shall be conducted in accordance with the test methods and procedures under 40 CFR Part 60.54;

c. emission testing shall be conducted while the emissions unit is operating at or near its capacity, unless otherwise specified or approved by the Akron RAQMD.

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

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

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

2. Compliance with the emission limitations in sections A.I.1 and A.I.2.b of these terms and conditions shall be determined in accordance with the following methods:

2.a Emission Limitation:

0.18 grams of particulates per dry standard cubic meter of exhaust gas (0.08gr/dscf) corrected to 12 percent carbon dioxide

Applicable Compliance Method:

Compliance shall be demonstrated in accordance with the test methods and procedures under 40 CFR Part 60.54.

2.b Emission Limitation:

20% opacity as a 6-minute average, except as provided by rule

Applicable Compliance Method:

Compliance with the visible emission limitation in OAC rule 3745-17-07(A)(1) shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures in OAC rule 3745-17-03(B)(1).

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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

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