



State of Ohio Environmental Protection Agency

Street Address:

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

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Mailing Address:

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

11/13/02

CERTIFIED MAIL

**RE: Preliminary Proposed Title V
Chapter 3745-77 permit**

13-18-00-0246
Dominion Cleveland Thermal Inc
Barry K. Wisner
1921 Hamilton Avenue
Cleveland, OH 44114

Dear Barry K. Wisner:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 11/12/98. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **Please submit, in writing, any comments you may have within fourteen (14) days from your receipt of this letter to:**

Ohio Environmental Protection Agency
Jim Orlemann, Manager, Engineering Section
Division of Air Pollution Control
P.O.Box 1049
Columbus, OH 43216-1049

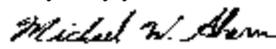
and

Cleveland Division of Air Pollution Control
1925 St. Clair
Cleveland, OH 44114
(216) 664-2324

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Very truly yours,


Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

cc: Cleveland Division of Air Pollution Control
File, DAPC PMU



State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Issue Date: 11/13/02	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 13-18-00-0246 to:
Dominion Cleveland Thermal Inc
 1901 Hamilton Avenue
 2274 Canal Road
 Cleveland, OH 44114

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

B001 (Boiler 1) 170 MMBtu/Hr Oil Fired Boiler	B006 (Boiler 6)) 220 MMBtu/Hr Gas/Oil Fired Boiler	Multiclone
B002 (Boiler 2) 170 MMBtu/Hr Oil Fired Boiler	B101 (Boiler 34) 228 MMBtu/Hr Chain Grate Coal Boiler with Multiclone	F103 (Coal Convey System) 250 TPH Coal Unloading and Conveying System
B003 (Boiler 3) 170 MMBtu/Hr Oil Fired Boiler	B102 (Boiler 35) 228 MMBtu/Hr Chain Grate Coal Boiler with Multiclone	P001 (Cooling Tower 1) 15,000 GPM Forced Draft Cooling Tower
B004 (Boiler 4) 170 MMBtu/Hr Oil Fired Boiler	B104 (Boiler 37) 228 MMBtu/Hr Chain Grate Coal Boiler with	P002 (Cooling Tower 2) 15,000 GPM Forced Draft Cooling Tower
B005 (Boiler 5) 220 MMBtu/Hr Gas/Oil 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:

Cleveland Division of Air Pollution Control
 1925 St. Clair
 Cleveland, OH 44114
 (216) 664-2324

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
 Director

PART I - GENERAL TERMS AND CONDITIONS

A. *State and Federally Enforceable Section*

1. **Monitoring and Related Record Keeping 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

- 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

- c. The permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))
 - ii. **For emission limitations, operational restrictions, and control device operating parameter limitations:**
 - (a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring and record keeping 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. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of

each deviation. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i), (ii) and (iii))

- (b) Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))

iii. **For monitoring, record keeping, and reporting requirements:**

Written reports that identify any deviations from the federally enforceable monitoring, record keeping, 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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, record keeping, 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.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

- 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

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 of any emissions unit(s) 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 OAC rule 3745-15-06, 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).

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

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.

(Authority for term: OAC rule 3745-77-07(A)(4))

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.

(Authority for term: OAC rule 3745-77-07(A)(5))

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

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, in accordance with A.10 below. 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.

(Authority for term: OAC rule 3745-77-07(A)(7))

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.

(Authority for term: OAC rule 3745-77-07(A)(8))

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.

(Authority for term: OAC rule 3745-77-07(A)(9))

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.

(Authority for term: OAC rule 3745-77-07(A)(10))

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 (18) 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.
(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

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.

(Authority for term: OAC rule 3745-77-07(B))

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 Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA 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.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

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.

(Authority for term: OAC rule 3745-77-07(F))

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).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

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.

(Authority for term: OAC rule 3745-77-07(G))

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 of the U.S. EPA, 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.
- 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 purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

(Authority for term: OAC rule 3745-77-07(I))

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.

(This term is provided for informational purposes only.)

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

19. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

B. State Only Enforceable Section

1. Reporting Requirements Related to Monitoring and Record Keeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or record keeping 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) 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. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

2. 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.

3. 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.

4. 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).

5. 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.

6. 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

1. Emissions units B103 and B105 have not been operated during the past five years. Before these emissions units are granted authorization to operate, the permittee shall conduct, or have conducted, particulate, sulfur dioxide, and visible particulate emission testing for these emissions units to demonstrate compliance with the allowable mass emission rates of 0.10 lb/mmBtu actual heat input, 1.5 lbs/mmBtu actual heat input, and 20% opacity as a 6-minute average (except as provided by rule), respectively. In addition, the permittee shall comply with any applicable State and federal new source review and permitting requirements prior to the activation of these emissions units.

Compliance with allowable mass emission rate for particulates shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 and the procedures in OAC rule 3745-17-03(B)(9).

Compliance with allowable mass emission rate for sulfur dioxide shall be determined in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

Compliance with allowable mass emission rate for visible particulates 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).

The tests shall be conducted while these emissions units are operating at or near their maximum capacities.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

B. State Only Enforceable Section

1. The following insignificant emissions units are located at the Hamilton Road facility:

- T001 Oil Storage Tank 1
- T002 Oil Storage Tank 2
- Z001 Parts Washer Ham
- Z002 Parts Washer Dist
- Z003 Welding Area Ham
- Z004 Welding Area Dist
- Z005 Painting Area Ham
- Z006 Anti-Freeze Drum Storage
- Z007 Sodium Hypochlorite Tank
- Z008 Mineral Spirits Storage
- Z009 Water Treatment Chemical Mix Tank
- Z010 Lube Oil Tanks
- Z011 Biosperse Storage Tank
- Z012 Diesel Fuel Tank
- Z013 Refrigerant Storage

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.

B. State Only Enforceable Section (continued)

2. The following insignificant emissions units are located at the Canal Road facility:

- F101 Plant Parking
- F102 Coal Storage
- Z101 Ash Silo
- Z102 Parts Washer Canal
- Z103 Parts Washer Canal
- Z104 Parts Washer Canal
- Z105 Welding Area Canal
- Z106 Grit Blasting Area
- Z107 Painting Area
- Z108 Diesel Fuel Area
- Z109 Amine Storage Tank
- Z110 Inhibitor Storage Tank
- Z111 Aux Chemical Treatment Tank
- Z112 Lube Oil Tanks

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 1 (B001)
Activity Description: 170 MMBtu/Hr Oil Fired Boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
170 mmBtu/hr, No. 6 residual oil-fired boiler (used for district heating and cooling system) located at the Hamilton Ave Plant	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-10(C)(1)	0.10 pound of PE per mmBtu of actual heat input
	OAC rule 3745-18-24(G)	1.0 pound of sulfur dioxide (SO ₂) per mmBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The quality of oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.0 lb of SO₂/mmBtu of actual heat input.

III. Monitoring and/or Record Keeping Requirements

- 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, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

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 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

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

2. 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 minimize or eliminate the visible emissions.

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

IV. Reporting Requirements

1. The permittee shall notify the Cleveland local air agency (Cleveland LAA) in writing of any record showing a deviation of the allowable sulfur dioxide emission limitation, as shown by the calculated sulfur dioxide emission rates from section A.III.1 above. The notification shall include a copy of such record and shall be sent to the Cleveland LAA within 45 days after the deviation occurs.
2. The permittee shall submit semiannual written reports that (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 minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Cleveland LAA 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 section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
0.10 lb of PE per mmBtu of actual heat input

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the PE limitation above based on the results of emission testing conducted in accordance with OAC rule 3745-17-03(B)(9).

The permittee may also demonstrate compliance based upon multiplying the maximum fuel oil capacity of the emissions unit (1130 gallons/hr) by the AP-42 emission factor* for No. 6 fuel oil (9.19(S) + 3.22 lbs/1000 gal), where S is the percent sulfur in the fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (170 mmBtu/hr).

*AP-42, Fifth Edition, Supplement D (7-98), Table 1.3-1

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
1.0 lb of SO₂ emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the allowable sulfur dioxide emission limitation may be demonstrated by documenting that each shipment of oil meets the applicable limitation.

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

- 1.c** Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Methods:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1). [This paragraph does not apply to the daily check for visible emissions under section A.III.]

- 2.** 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 6 months of permit issuance.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 - 5 of 40 CFR, Part 60, Appendix A. [Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.]
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland LAA.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland LAA. 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 Cleveland LAA's refusal to accept the results of the emission test(s).

Personnel from the Cleveland LAA 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland LAA 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 Cleveland LAA.

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: Boiler 2 (B002)
Activity Description: 170 MMBtu/Hr Oil Fired Boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
170 mmBtu/hr, No. 6 residual oil-fired boiler (used for district heating and cooling system) located at the Hamilton Ave Plant	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-10(C)(1)	0.10 pound of PE per mmBtu of actual heat input
	OAC rule 3745-18-24(G)	1.0 pound of sulfur dioxide (SO ₂) per mmBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The quality of oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.0 lb of SO₂/mmBtu of actual heat input.

III. Monitoring and/or Record Keeping Requirements

- 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, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

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 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

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

2. 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 minimize or eliminate the visible emissions.

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

IV. Reporting Requirements

1. The permittee shall notify the Cleveland local air agency (Cleveland LAA) in writing of any record showing a deviation of the allowable sulfur dioxide emission limitation, as shown by the calculated sulfur dioxide emission rates from section A.III.1 above. The notification shall include a copy of such record and shall be sent to the Cleveland LAA within 45 days after the deviation occurs.
2. The permittee shall submit semiannual written reports that (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 minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Cleveland LAA 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 section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
0.10 lb of PE per mmBtu of actual heat input

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the PE limitation above based on the results of emission testing conducted in accordance with OAC rule 3745-17-03(B)(9).

The permittee may also demonstrate compliance based upon multiplying the maximum fuel oil capacity of the emissions unit (1130 gallons/hr) by the AP-42 emission factor* for No. 6 fuel oil (9.19(S) + 3.22 lbs/1000 gal), where S is the percent sulfur in the fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (170 mmBtu/hr).

*AP-42, Fifth Edition, Supplement D (7-98), Table 1.3-1

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
1.0 lb of SO₂ emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the allowable sulfur dioxide emission limitation may be demonstrated by documenting that each shipment of oil meets the applicable limitation.

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

- 1.c** Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Methods:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1). [This paragraph does not apply to the daily check for visible emissions under section A.III.]

- 2.** 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 6 months of permit issuance.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 - 5 of 40 CFR, Part 60, Appendix A. [Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.]
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland LAA.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland LAA. 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 Cleveland LAA's refusal to accept the results of the emission test(s).

Personnel from the Cleveland LAA 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland LAA 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 Cleveland LAA.

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: Boiler 3 (B003)
Activity Description: 170 MMBtu/Hr Oil Fired Boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
170 mmBtu/hr, No. 6 residual oil-fired boiler (used for district heating and cooling system) located at the Hamilton Ave Plant	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-10(C)(1)	0.10 pound of PE per mmBtu of actual heat input
	OAC rule 3745-18-24(G)	1.0 pound of sulfur dioxide (SO ₂) per mmBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The quality of oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.0 lb of SO₂/mmBtu of actual heat input.

III. Monitoring and/or Record Keeping Requirements

- 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, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

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 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

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

2. 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 minimize or eliminate the visible emissions.

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

IV. Reporting Requirements

1. The permittee shall notify the Cleveland local air agency (Cleveland LAA) in writing of any record showing a deviation of the allowable sulfur dioxide emission limitation, as shown by the calculated sulfur dioxide emission rates from section A.III.1 above. The notification shall include a copy of such record and shall be sent to the Cleveland LAA within 45 days after the deviation occurs.
2. The permittee shall submit semiannual written reports that (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 minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Cleveland LAA 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 section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
0.10 lb of PE per mmBtu of actual heat input

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the PE limitation above based on the results of emission testing conducted in accordance with OAC rule 3745-17-03(B)(9).

The permittee may also demonstrate compliance based upon multiplying the maximum fuel oil capacity of the emissions unit (1130 gallons/hr) by the AP-42 emission factor* for No. 6 fuel oil (9.19(S) + 3.22 lbs/1000 gal), where S is the percent sulfur in the fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (170 mmBtu/hr).

*AP-42, Fifth Edition, Supplement D (7-98), Table 1.3-1

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
1.0 lb of SO₂ emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the allowable sulfur dioxide emission limitation may be demonstrated by documenting that each shipment of oil meets the applicable limitation.

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

- 1.c** Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Methods:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1). [This paragraph does not apply to the daily check for visible emissions under section A.III.]

- 2.** 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 6 months of permit issuance.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 - 5 of 40 CFR, Part 60, Appendix A. [Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.]
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland LAA.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland LAA. 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 Cleveland LAA's refusal to accept the results of the emission test(s).

Personnel from the Cleveland LAA 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland LAA 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 Cleveland LAA.

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: Boiler 4 (B004)
Activity Description: 170 MMBtu/Hr Oil Fired Boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
170 mmBtu/hr, No. 6 residual oil-fired boiler (used for district heating and cooling system) located at the Hamilton Ave Plant	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-10(C)(1)	0.10 pound of PE per mmBtu of actual heat input
	OAC rule 3745-18-24(G)	1.0 pound of sulfur dioxide (SO ₂) per mmBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The quality of oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.0 lb of SO₂/mmBtu of actual heat input.

III. Monitoring and/or Record Keeping Requirements

- 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, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

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 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

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

2. 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 minimize or eliminate the visible emissions.

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

IV. Reporting Requirements

1. The permittee shall notify the Cleveland local air agency (Cleveland LAA) in writing of any record showing a deviation of the allowable sulfur dioxide emission limitation, as shown by the calculated sulfur dioxide emission rates from section A.III.1 above. The notification shall include a copy of such record and shall be sent to the Cleveland LAA within 45 days after the deviation occurs.
2. The permittee shall submit semiannual written reports that (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 minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Cleveland LAA 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 section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
0.10 lb of PE per mmBtu of actual heat input

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the PE limitation above based on the results of emission testing conducted in accordance with OAC rule 3745-17-03(B)(9).

The permittee may also demonstrate compliance based upon multiplying the maximum fuel oil capacity of the emissions unit (1130 gallons/hr) by the AP-42 emission factor* for No. 6 fuel oil (9.19(S) + 3.22 lbs/1000 gal), where S is the percent sulfur in the fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (170 mmBtu/hr).

*AP-42, Fifth Edition, Supplement D (7-98), Table 1.3-1

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
1.0 lb of SO₂ emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the allowable sulfur dioxide emission limitation may be demonstrated by documenting that each shipment of oil meets the applicable limitation.

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

- 1.c** Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Methods:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03 (B)(1). [This paragraph does not apply to the daily check for visible emissions under section A.III.]

- 2.** 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 6 months of permit issuance.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 - 5 of 40 CFR, Part 60, Appendix A. [Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.]
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland LAA.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland LAA. 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 Cleveland LAA's refusal to accept the results of the emission test(s).

Personnel from the Cleveland LAA 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland LAA 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 Cleveland LAA.

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: Boiler 5 (B005)
Activity Description: 220 MMBtu/Hr Gas/Oil Fired Boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
220 mmBtu/hr natural gas/No. 6 fuel oil-fired boiler equipped with a low NOx burner (used for district heating and cooling system) located at the Hamilton Ave Plant	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-17-10(C)(1)	0.10 pound of PE per mmBtu of actual heat input
	OAC rule 3745-18-24(G)	1.0 pound of sulfur dioxide (SO ₂) per mmBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The quality of oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.0 lb of SO₂/mmBtu of actual heat input.

III. Monitoring and/or Record Keeping Requirements

- 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, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

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 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

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

2. 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 minimize or eliminate the visible emissions.

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

IV. Reporting Requirements

1. The permittee shall notify the Cleveland local air agency (Cleveland LAA) in writing of any record showing a deviation of the allowable sulfur dioxide emission limitation, as shown by the calculated sulfur dioxide emission rates from section A.III.1 above. The notification shall include a copy of such record and shall be sent to the Cleveland LAA within 45 days after the deviation occurs.
2. The permittee shall submit semiannual written reports that (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 minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Cleveland LAA 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 section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
0.10 lb of PE per mmBtu of actual heat input

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the PE limitation above based on the results of emission testing conducted in accordance with OAC rule 3745-17-03(B)(9).

The permittee may also demonstrate compliance based upon multiplying the maximum fuel oil capacity of the emissions unit (1130 gallons/hr) by the AP-42 emission factor* for No. 6 fuel oil (9.19(S) + 3.22 lbs/1000 gal), where S is the percent sulfur in the fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (220 mmBtu/hr).

For the use of natural gas, compliance may also be demonstrated based upon multiplying the maximum hourly gas burning capacity of the emissions unit (0.220 mmcu.ft/hr) by the AP-42 emission factor** for natural gas (1.9 lbs/mmcu.ft), and then dividing by the maximum hourly heat input capacity of the emissions unit (220 mmBtu/hr).

*AP-42, Fifth Edition, Supplement D (7-98), Table 1.3-1

**AP-42, Fifth Edition, Supplement D (7-98), Table 1.4-2

V. Testing Requirements (continued)

- 1.b** Emission Limitation:
1.0 lb of SO₂ emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the allowable sulfur dioxide emission limitation may be demonstrated by documenting that each shipment of oil meets the applicable limitation.

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

- 1.c** Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Methods:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1). [This paragraph does not apply to the daily check for visible emissions under section A.III.]

- 2.** 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 6 months of permit issuance.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 - 5 of 40 CFR, Part 60, Appendix A. [Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.]
 - d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland LAA.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland LAA. 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 Cleveland LAA's refusal to accept the results of the emission test(s).

Personnel from the Cleveland LAA 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland LAA 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 Cleveland LAA.

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: Boiler 6 (B006)
Activity Description: 220 MMBtu/Hr Gas/Oil Fired Boiler

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
220 mmBtu/hr natural gas/No. 6 fuel oil-fired boiler equipped with a low NOx burner (used for district heating and cooling system) located at the Hamilton Ave Plant	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule
	OAC rule 3745-17-10(C)(1)	0.10 pound of PE per mmBtu of actual heat input
	OAC rule 3745-18-24(G)	1.0 pound of sulfur dioxide (SO ₂) per mmBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The quality of oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.0 lb of SO₂/mmBtu of actual heat input.

III. Monitoring and/or Record Keeping Requirements

- 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, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

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 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

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

2. 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 minimize or eliminate the visible emissions.

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

IV. Reporting Requirements

1. The permittee shall notify the Cleveland local air agency (Cleveland LAA) in writing of any record showing a deviation of the allowable sulfur dioxide emission limitation, as shown by the calculated sulfur dioxide emission rates from section A.III.1 above. The notification shall include a copy of such record and shall be sent to the Cleveland LAA within 45 days after the deviation occurs.
2. The permittee shall submit semiannual written reports that (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 minimize or eliminate the visible particulate emissions. These reports shall be submitted to the Cleveland LAA 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 section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:
 - 1.a Emission Limitation:
0.10 lb of PE per mmBtu of actual heat input

Applicable Compliance Methods:

The permittee shall demonstrate compliance with the PE limitation above based on the results of emission testing conducted in accordance with OAC rule 3745-17-03(B)(9).

The permittee may also demonstrate compliance based upon multiplying the maximum fuel oil capacity of the emissions unit (1130 gallons/hr) by the AP-42 emission factor* for No. 6 fuel oil (9.19(S) + 3.22 lbs/1000 gal), where S is the percent sulfur in the fuel oil, and then dividing by the maximum hourly heat input capacity of the emissions unit (220 mmBtu/hr).

For the use of natural gas, compliance may also be demonstrated based upon multiplying the maximum hourly gas burning capacity of the emissions unit (0.220 mmcu.ft/hr) by the AP-42 emission factor** for natural gas (1.9 lbs/mmcu.ft), and then dividing by the maximum hourly heat input capacity of the emissions unit (220 mmBtu/hr).

*AP-42, Fifth Edition, Supplement D (7-98), Table 1.3-1

**AP-42, Fifth Edition, Supplement D (7-98), Table 1.4-2

V. Testing Requirements (continued)

- 1.b** Emission Limitation -
1.0 lb of SO₂ emissions per mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the allowable sulfur dioxide emission limitation may be demonstrated by documenting that each shipment of oil meets the applicable limitation.

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

- 1.c** Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Methods:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1). [This paragraph does not apply to the daily check for visible emissions under section A.III.]

- 2.** The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- The emission testing shall be conducted within 6 months of permit issuance.
 - The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE.
 - The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 - 5 of 40 CFR, Part 60, Appendix A. [Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.]
 - The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Cleveland LAA.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland LAA. 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 Cleveland LAA's refusal to accept the results of the emission test(s).

Personnel from the Cleveland LAA 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland LAA 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 Cleveland LAA.

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: Boiler 34 (B101)

Activity Description: 228 MMBtu/Hr Chain Grate Coal Boiler with Multiclone

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>
228 mmBtu/hr, chain grate coal-fired boiler (used for district heating and cooling system) [particulate emissions are controlled by a multiclone] (located at the Canal Road Plant)	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-10(C)(1)	0.10 pound of PE per mmBtu of actual heat input
	OAC rule 3745-18-24(F)	1.5 pounds of sulfur dioxide (SO ₂) per mmBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The quality of the coal burned in this emissions unit shall meet the following specifications on a dry basis:
 - a. an average weekly "as received" ash content of no greater than 7.25%;
 - b. a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.5 pounds of SO₂/mmBtu of actual heat input; and
 - c. a heat content greater than 13,000 Btu/pound of coal.
2. The pressure drop across the multiclone shall be maintained within the range of 3 to 5 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect a representative sample of each shipment of coal which is received for burning in this emissions unit. 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 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 from the Cleveland LAA.

2. The permittee shall maintain monthly records of the total quantity of coal received, and the results of the analyses for ash content, sulfur content, and heat content.
3. The permittee shall properly 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 (one- minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

4. The permittee shall properly operate and maintain the existing equipment to monitor the pressure drop across the multiclone while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the multiclone on an once-per-shift basis.

IV. Reporting Requirements

1. The permittee shall submit quarterly reports concerning the quality and quantity 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 ash content (percent) of the coal received;
- c. the average sulfur content (percent) of the coal received;
- d. the average heat content (Btu/pound) of the coal received; and
- e. the calculated average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received. This calculation shall be performed using the equation specified in OAC rule 3745-18-04(F).

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

IV. Reporting Requirements (continued)

2. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Cleveland LAA 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 permittee shall submit reports within 30 days following the end of each calendar quarter to the Cleveland LAA documenting 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.

3. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the multiclone did not comply with the allowable range specified in term A.II.2.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

V. Testing Requirements

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

- 1.a Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

- 1.b Emission Limitation:
0.10 lb of PE per mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the PE limitation above based on the results of emission testing conducted in accordance with OAC rule 3745-17-03(B)(9).

V. Testing Requirements (continued)

- 1.c** Emission Limitation:
1.5 lbs of SO₂ emissions per mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the SO₂ emission limitation above based on the monitoring and record keeping requirements in Sections A.III.1 and A.III.2 and the reporting requirements in Section A.IV.1 of this permit. The SO₂ emission rate shall be calculated pursuant to the equation specified in OAC rule 3745-18-04(F).

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

- 2.** 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 once per heating season.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 - 5 of 40 CFR, Part 60, Appendix A. [Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.]
 - d. Two sets of tests shall be conducted. One while the emissions unit is operating at or near its low load (approximately 100,000 lbs/hr of steam) and one at or near its maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland LAA. 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 Cleveland LAA's refusal to accept the results of the emission test(s).

Personnel from the Cleveland LAA 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland LAA 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 Cleveland LAA.

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: Boiler 35 (B102)

Activity Description: 228 MMBtu/Hr Chain Grate Coal Boiler with Multiclone

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>
228 mmBtu/hr, chain grate coal-fired boiler (used for district heating and cooling system) [particulate emissions are controlled by a multiclone] (located at the Canal Road Plant)	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-10(C)(1)	0.10 pound of PE per mmBtu of actual heat input
	OAC rule 3745-18-24(F)	1.5 pounds of sulfur dioxide (SO ₂) per mmBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The quality of the coal burned in this emissions unit shall meet the following specifications on a dry basis:
 - a. an average weekly "as received" ash content of no greater than 7.25%;
 - b. a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.5 pounds of SO₂/mmBtu of actual heat input; and
 - c. a heat content greater than 13,000 Btu/pound of coal.
2. The pressure drop across the multiclone shall be maintained within the range of 3 to 5 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect a representative sample of each shipment of coal which is received for burning in this emissions unit. 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 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 from the Cleveland LAA.

2. The permittee shall maintain monthly records of the total quantity of coal received, and the results of the analyses for ash content, sulfur content, and heat content.
3. The permittee shall properly 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 (one- minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

4. The permittee shall properly operate and maintain the existing equipment to monitor the pressure drop across the multiclone while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the multiclone on an once-per-shift basis.

IV. Reporting Requirements

1. The permittee shall submit quarterly reports concerning the quality and quantity 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 ash content (percent) of the coal received;
- c. the average sulfur content (percent) of the coal received;
- d. the average heat content (Btu/pound) of the coal received; and
- e. the calculated average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received. This calculation shall be performed using the equation specified in OAC rule 3745-18-04(F).

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

IV. Reporting Requirements (continued)

2. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Cleveland LAA 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 permittee shall submit reports within 30 days following the end of each calendar quarter to the Cleveland LAA documenting 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.

3. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the multiclone did not comply with the allowable range specified in term A.II.2.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

V. Testing Requirements

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

- 1.a Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

- 1.b Emission Limitation:
0.10 lb of PE per mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the PE limitation above based on the results of emission testing conducted in accordance with OAC rule 3745-17-03(B)(9).

V. Testing Requirements (continued)

- 1.c** Emission Limitation:
1.5 lbs of SO₂ emissions per mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the SO₂ emission limitation above based on the monitoring and record keeping requirements in Sections A.III.1 and A.III.2 and the reporting requirements in Section A.IV.1 of this permit. The SO₂ emission rate shall be calculated pursuant to the equation specified in OAC rule 3745-18-04(F).

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

- 2.** 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 once per heating season.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 - 5 of 40 CFR, Part 60, Appendix A. [Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.]
 - d. Two sets of tests shall be conducted. One while the emissions unit is operating at or near its low load (approximately 100,000 lbs/hr of steam) and one at or near its maximum capacity.

If the results of the emission test show the emissions at high load to be in excess of the limitations, the boiler(s) tested shall be limited to low load operation (i.e. 100,000 #steam/hour) and an emission test at this reduced capacity shall be performed, subject to the provisions of the remainder of this paragraph, within 30 days to show compliance.

Production shall be reduced to this required level until such time as any reasons for the stack test failure have been identified and corrected and another stack test has been conducted which shows the boiler in compliance at high load. If the retest at high load is conducted within 30 days, then the permittee is not required to perform an additional test at reduced capacity.

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: Boiler 37 (B104)

Activity Description: 228 MMBtu/Hr Chain Grate Coal Boiler with Multiclone

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>
228 mmBtu/hr, chain grate coal-fired boiler (used for district heating and cooling system) [particulate emissions are controlled by a multiclone] (located at the Canal Road Plant)	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
	OAC rule 3745-17-10(C)(1)	0.10 pound of PE per mmBtu of actual heat input
	OAC rule 3745-18-24(F)	1.5 pounds of sulfur dioxide (SO ₂) per mmBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The quality of the coal burned in this emissions unit shall meet the following specifications on a dry basis:
 - a. an average weekly "as received" ash content of no greater than 7.25%;
 - b. a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation of 1.5 pounds of SO₂/mmBtu of actual heat input; and
 - c. a heat content greater than 13,000 Btu/pound of coal.
2. The pressure drop across the multiclone shall be maintained within the range of 3 to 5 inches of water while the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall collect a representative sample of each shipment of coal which is received for burning in this emissions unit. 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 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 from the Cleveland LAA.

2. The permittee shall maintain monthly records of the total quantity of coal received, and the results of the analyses for ash content, sulfur content, and heat content.
3. The permittee shall properly 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 (one- minute) and 6-minute block average basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

4. The permittee shall properly operate and maintain the existing equipment to monitor the pressure drop across the multiclone while the emissions unit is in operation. The monitoring equipment shall be calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manual(s). The permittee shall record the pressure drop across the multiclone on an once-per-shift basis.

IV. Reporting Requirements

1. The permittee shall submit quarterly reports concerning the quality and quantity 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 ash content (percent) of the coal received;
- c. the average sulfur content (percent) of the coal received;
- d. the average heat content (Btu/pound) of the coal received; and
- e. the calculated average sulfur dioxide emissions rate (pounds sulfur dioxide/mmBtu actual heat input) from the coal received. This calculation shall be performed using the equation specified in OAC rule 3745-18-04(F).

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

IV. Reporting Requirements (continued)

2. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Cleveland LAA 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 permittee shall submit reports within 30 days following the end of each calendar quarter to the Cleveland LAA documenting 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.

3. The permittee shall submit quarterly pressure drop deviation (excursion) reports that identify all periods of time during which the pressure drop across the multiclone did not comply with the allowable range specified in term A.II.2.
4. The quarterly deviation reports shall be submitted in accordance with the reporting requirements specified in Part I - General Term and Condition A.1.c.ii.

V. Testing Requirements

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

- 1.a Emission Limitation:
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1).

- 1.b Emission Limitation:
0.10 lb of PE per mmBtu of actual heat input

Applicable Compliance Method:
The permittee shall demonstrate compliance with the PE limitation above based on the results of emission testing conducted in accordance with OAC rule 3745-17-03(B)(9).

V. Testing Requirements (continued)

- 1.c** Emission Limitation:
1.5 lbs of SO₂ emissions per mmBtu of actual heat input

Applicable Compliance Method:

The permittee shall demonstrate compliance with the SO₂ emission limitation above based on the monitoring and record keeping requirements in Sections A.III.1 and A.III.2 and the reporting requirements in Section A.IV.1 of this permit. The SO₂ emission rate shall be calculated pursuant to the equation specified in OAC rule 3745-18-04(F).

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

- 2.** 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 once per heating season.
 - b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for PE.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate: Methods 1 - 5 of 40 CFR, Part 60, Appendix A. [Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.]
 - d. Two sets of tests shall be conducted. One while the emissions unit is operating at or near its low load (approximately 100,000 lbs/hr of steam) and one at or near its maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Cleveland LAA. 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 Cleveland LAA's refusal to accept the results of the emission test(s).

Personnel from the Cleveland LAA 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 emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Cleveland LAA 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 Cleveland LAA.

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 Convey System (F103)
Activity Description: 250 TPH Coal Unloading and 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>
250 tons/hour coal unloading and conveying system (located at the Canal Road Plant)	OAC rule 3745-17-07(B)(1)	Visible particulate emissions (PE) from any fugitive dust source shall not exceed twenty percent opacity as a three-minute average.
	OAC rule 3745-17-08(B)	reasonably available control measures (RACM) that are sufficient to minimize or eliminate visible emissions of fugitive dust.
		See section A.1.2 below.

2. Additional Terms and Conditions

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

coal unloading
 coal conveying system

- 2.b The permittee shall employ reasonably available control measures for the above-identified material handling operations for the purpose of ensuring compliance with the above-mentioned applicable requirements. The permittee shall perform the following control measures to ensure compliance:
 - a. The speed that the rail car dumper unloads the cars shall be controlled and limited in a manner so as to minimize or eliminate visible emissions of fugitive dust.
 - b. The doors, windows and other openings of the rail dumper and conveyor enclosures shall be maintained and adjusted or closed according to the meteorological conditions to effectively minimize or eliminate the visible emissions of fugitive dust.

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

2. Additional Terms and Conditions (continued)

- 2.c** For each material handling operation that is not adequately enclosed, the above-identified control measures shall be implemented 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 the operation of the material handling operations until further observation confirms that use of the control measures are unnecessary.
- 2.d** Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit are 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, for all material handling operations that are not adequately enclosed, the permittee shall perform daily inspections when this emissions unit is in operation.
- 2.** The above-mentioned inspections shall be performed during representative, normal operating conditions.
- 3.** 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 measure(s);
 - c.** the dates the control measure(s) was (were) implemented; and
 - d.** on a calendar quarter basis, the total number of days the control measure(s) was (were) implemented.

The information in 3.d. shall be kept separately for each material handling operation identified above, 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 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.
- 2.** The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

V. Testing Requirements

- 1.** Compliance with the visible emission limitation for the material handling operations 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, 2002, and the modifications listed in paragraphs (B)(3)(a) and (B)(3)(b) 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: Cooling Tower 1 (P001)
Activity Description: 15,000 GPM Forced Draft Cooling Tower

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
15,000 gpm induced draft cooling tower #1 (particulate emissions are controlled by drift eliminators and a impingement baffle) (located at the Hamilton Ave Plant)	OAC rule 3745-17-07(A)	The visible particulate emissions (PE) limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A)(3) (PTI# 13-2955)	PE shall not exceed 2.0 lbs/hr and 8.76 tons per year (TPY). Volatile organic compound (VOC) emissions shall not exceed 3.0 lbs/hr and 13.14 TPY. Visible PE shall not exceed 5% opacity, as a 6-minute average.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate the drift eliminators and impingement baffle at all times when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall maintain daily records that document any time periods when the drift eliminators and impingement baffle were not in service when the emissions unit was in operation.

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

2. 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.
3. The permittee shall maintain monthly records that indicate the amounts of chemicals (e.g., corrosion inhibitors and biocide chemicals) added to the cooling tower, in pounds, and the total number of hours during the month when these chemicals were added to the cooling tower.
4. The permittee shall maintain monthly records of the average hourly emission rate of VOC for this emissions unit as follows:

total lbs of all VOC containing chemicals added/month (from A.III.3) divided by the total number of hours during the month when chemicals were added in the tower = average lbs of VOC chemicals used/hour

average lbs of VOC chemical/hr x .70* = lbs of VOC per hour

* In accordance with PTI 13-2955, issued June 14, 1995, the percentage of VOC emitted to the atmosphere under standard conditions is approximately 70% of the VOC content of the chemicals added to the cooling tower.

IV. Reporting Requirements

1. The permittee shall notify the Cleveland LAA in writing of any record showing that the drift eliminators or impingement baffle were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Cleveland LAA within 30 days after the event occurs.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, (b) describe any corrective actions taken to eliminate the visible particulate emissions, and (c) specify the average hourly VOC emission rate for each month. These reports shall be submitted to the Cleveland LAA 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 Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
2.0 lbs of PE/hr and 8.76 TPY of PE

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the AP-42 emission factor for wet cooling towers* (1.7 lbs of PE/1000 gal) by 2% of the water circulating flow (0.02), by the maximum hourly water flow rate (15,000 gal/min x 60 min/hr), and then by (1 - 0.95), which is the efficiency of the control equipment.

*AP-42, Compilation of Air Pollution Emission Factors, Fifth Edition, Supplement D (1-95), Table 13.4-1

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 5 of 40 CFR, Part 60, Appendix A.

Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

- 1.b** Emission Limitation -
3.0 lbs/hr and 13.14 TPY of VOC emissions

Applicable Compliance Method:

Compliance with the hourly VOC emission limitation may be based upon the record keeping performed pursuant to sections A.III.3 and A.III.4.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 25 of 40 CFR, Part 60, Appendix A.

Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

- 1.c** Emission Limitation -
Visible PE shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method -

If required, compliance shall be determined through visible emissions 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).

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: Cooling Tower 2 (P002)
Activity Description: 15,000 GPM Forced Draft Cooling Tower

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 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>
15,000 gpm induced draft cooling tower #2 (particulate emissions are controlled by drift eliminators and a impingement baffle) (located at the Hamilton Ave Plant)	OAC rule 3745-17-07(A)	The visible particulate emissions (PE) limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-31-05(A)(3) (PTI# 13-2955)	PE shall not exceed 2.0 lbs/hr and 8.76 tons per year (TPY).
		Volatile organic compound (VOC) emissions shall not exceed 3.0 lbs/hr and 13.14 TPY.
		Visible PE shall not exceed 5% opacity, as a 6-minute average.

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee shall operate the drift eliminators and impingement baffle at all times when the emissions unit is in operation.

III. Monitoring and/or Record Keeping Requirements

- The permittee shall maintain daily records that document any time periods when the drift eliminators and impingement baffle were not in service when the emissions unit was in operation.

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

2. 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.
3. The permittee shall maintain monthly records that indicate the amounts of chemicals (e.g., corrosion inhibitors and biocide chemicals) added to the cooling tower, in pounds, and the total number of hours during the month when these chemicals were added to the cooling tower.
4. The permittee shall maintain monthly records of the average hourly emission rate of VOC for this emissions unit as follows:

total lbs of all VOC containing chemicals added/month (from A.III.3) divided by the total number of hours during the month when chemicals were added in the tower = average lbs of VOC chemicals used/hour

average lbs of VOC chemical/hr x .70* = lbs of VOC per hour

* In accordance with PTI 13-2955, issued June 14, 1995, the percentage of VOC emitted to the atmosphere under standard conditions is approximately 70% of the VOC content of the chemicals added to the cooling tower.

IV. Reporting Requirements

1. The permittee shall notify the Cleveland LAA in writing of any record showing that the drift eliminators or impingement baffle were not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Cleveland LAA within 30 days after the event occurs.
2. The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit, (b) describe any corrective actions taken to eliminate the visible particulate emissions, and (c) specify the average hourly VOC emission rate for each month. These reports shall be submitted to the Cleveland LAA 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 Section A.I.1. of these terms and conditions shall be determined in accordance with the following methods:

V. Testing Requirements (continued)

- 1.a** Emission Limitation:
2.0 lbs of PE/hr and 8.76 TPY of PE

Applicable Compliance Method:

Compliance with the hourly emission limitation may be determined by multiplying the AP-42 emission factor for wet cooling towers* (1.7 lbs of PE/1000 gal) by 2% of the water circulating flow (0.02), by the maximum hourly water flow rate (15,000 gal/min x 60 min/hr), and then by (1 - 0.95), which is the efficiency of the control equipment.

*AP-42, Compilation of Air Pollution Emission Factors, Fifth Edition, Supplement D (1-95), Table 13.4-1

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 5 of 40 CFR, Part 60, Appendix A.

Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

- 1.b** Emission Limitation -
3.0 lbs/hr and 13.14 TPY of VOC emissions

Applicable Compliance Method:

Compliance with the hourly VOC emission limitation may be based upon the record keeping performed pursuant to sections A.III.3 and A.III.4.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Method 25 of 40 CFR, Part 60, Appendix A.

Compliance with the annual limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was calculated by multiplying the hourly limitation by 8760, and then dividing by 2000).

- 1.c** Emission Limitation -
Visible PE shall not exceed 5% opacity, as a 6-minute average.

Applicable Compliance Method -

If required, compliance shall be determined through visible emissions 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).

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

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