



State of Ohio Environmental Protection Agency

Street Address:

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

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

Mailing Address:

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

02/28/01

CERTIFIED MAIL

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

14-13-00-0187
ZF Batavia LLC
PHILIP W. UTRECHT
1981 FRONT WHEEL DR
BATAVIA, OH 45103-3293

Dear PHILIP W. UTRECHT:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 09/18/97. The comment period 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 or with agreed-upon changes, then you have the opportunity to schedule a meeting with us to discuss your concerns.

Please contact Jim Orlemann, Engineering Section Manager, 614-644-3592, or you can telefax your request to (614) 644-3681, within fourteen (14) days from receipt of this letter if a meeting is desired. If a request for a meeting is not received within fourteen (14) days of receipt of this letter, we will forward this proposed permit (as written, or with agreed-upon changes) to USEPA for approval.

Very truly yours,

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

cc: Hamilton County Dept. of Environmental Services
Becky Castle, DAPC PMU



Ohio EPA

State of Ohio Environmental Protection Agency

PRELIMINARY PROPOSED TITLE V PERMIT

Date: 02/28/01

Effective Date: **To be entered upon final issuance**

Expiration Date: **To be entered upon final issuance**

This document constitutes issuance to:

ZF Batavia LLC
ZF BATAVIA, L.L.C.
1981 FRONT WHEEL DRIVE
BATAVIA, OHIO, OH 45103-3293

of a Title V permit for Facility ID: 14-13-00-0187

Emissions Unit ID (Company ID)/

Emissions Unit Activity Description:

B001 (BOILER 1)

145 MMBTU/HR LASKER SPREADER STOKER BOILER

B002 (BOILER 2)

61 MMBTU/HR LASKER SPREADER STOKER BOILER

B003 (BOILER 3)

145 MMBTU/HR LASKER SPREADER STOKER 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:

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

Christopher Jones
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Recordkeeping and Reporting Requirements

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. The operating conditions existing at the time of sampling or measurement.
- b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
 - i. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. These quarterly written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six months and OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations except malfunctions, which shall be reported in accordance with OAC rule 3745-15-06. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.) See B.8 below if no deviations occurred during the quarter.
 - iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i)

and (ii) pertaining to the reporting of any deviations related to the monitoring, recordkeeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

- iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports submitted pursuant to OAC rule 3745-15-06 shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of deviations caused by malfunctions or upsets.

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

3. Risk Management Plans

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

4. Title IV Provisions

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

5. Severability Clause

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

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

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

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

8. Marketable Permit Programs

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

9. Reasonably Anticipated Operating Scenarios

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

10. Reopening for Cause

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

- a. Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than

the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

- b. This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c. The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d. The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

11. Federal and State Enforceability

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

12. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.
- b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement.

Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

- i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d. Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the appropriate Ohio EPA District Office or local air agency in the following manner and with the following content:
- i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
 - ii. Compliance certifications shall include the following:
 - (a) An identification of each term or condition of this permit that is the basis of the certification.
 - (b) The permittee's current compliance status.
 - (c) Whether compliance was continuous or intermittent.
 - (d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
 - (e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
 - iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

13. Permit Shield

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

14. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed

therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

15. Emergencies

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

16. Off Permit Changes

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

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

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

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

17. Compliance Method Requirements

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

18. Insignificant Activity

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

B. State Only Enforceable Section

1. Permit to Install Requirement

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

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

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

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

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

1. 40 CFR, Part 68 is an applicable requirement for this facility. The permittee was required to submit a Risk Management Plan, pursuant to 40 CFR, Part 68, to the appropriate designated agency and comply with all appropriate subparts by no later than June 20, 1999.

B. State Only Enforceable Section

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

- B004 Fire Pump #1, 2, 3
- F001 Plant Roadways
- F002 Coal Storage
- F003 Coal Handling
- F004 Ash Handling
- G001 Gasoline Dispensing Facility
- P021 Batch & Draw Furnaces, Salt Quench Tanks and Washers
- P026 Pusher Furnace #5
- P027 Pusher Furnace #4
- P028 Reaction Furnaces 1 - 5
- P029 Pusher Furnace #3
- P030 Pusher Furnace #2
- P036 - P038 Grinders
- P039 Maintenance Equipment
- P040 Maintenance Equipment
- P064 W.W.Treatment Tank
- P065 - P177 Various Machining Operations Equipment
- T010 15,000 Gallon Waste Oil Tank
- T011 15,000 Gallon Waste Oil Tank
- T012 3000 Gallon Torque Fluid Tank
- T013 2 - 30,000 Gallon Hydraulic Fluid Tank
- T014 3 - 30,000 Gallon Transmission Fluid Tank
- T015 30,000 Gallon Standby Tank
- T018 15,000 Gallon Standby Tank
- T019 15,000 Gallon Lube Oil Tank
- T020 15,000 Gallon Lube Oil Tank
- T021 10,000 Gallon Standby Tank
- T022 10,000 Gallon Standby Tank
- Z005 Burnishers
- Z006 Grinders
- Z007 Deburrers
- Z008 Drills
- Z009 Bores
- Z010 Parts Washer
- Z011 Lathe
- Z012 Hone
- Z013 Rollers
- Z014 Filters
- Z015 Sanders
- Z016 Saw
- Z017 Transfer Line
- Z018 Welder
- Z019 W.W.Treatment System
- Z020 Quench Tank
- Z021 Markers
- Z022 Solvents
- Z023 Paints
- Z024 Lubricants
- Z025 Adhesives
- Z026 Methanol
- Z027 Lacquer Thinner
- Z028 Fugitive VOC from miscellaneous materials including the Maintenance Spray Booth
- Z029 Freon/CFC/HCFC

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: 145 MMBTU/HR LASKER SPREADER STOKER 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>
145 MMBtu/hr coal-fired boiler #1 with multiclones and an electrostatic precipitator (ESP), using used oil as a supplemental fuel	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-10(C)(1)	0.18 lb of particulate emissions/MMBtu of actual heat input
	OAC rule 3745-18-19(C)	1.6 lbs of sulfur dioxide (SO ₂) emissions/MMBtu of actual heat input

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

- The quality of the coal burned in this emissions unit, on an as-received basis, shall have a combination of sulfur content and heat content that is sufficient to comply with the allowable SO₂ emission limitation of 1.6 lbs/MMBtu of actual heat input.

Compliance with the above-mentioned specifications shall be determined by using the analytical results for the composite sample of coal collected during each calendar month.
- The quality of the used oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable SO₂ emission limitation specified in section A.I above.
- The permittee shall operate the ESP during any operation of this emissions unit, except the ESP is not required to be operated during periods of start-up until the exhaust gases have achieved a temperature of 250 degrees Fahrenheit at the inlet of the ESP or during periods of shutdown when the temperature of the exhaust gases has dropped below 250 degrees Fahrenheit at the inlet of the ESP.
- The average total combined power input (in kilowatts) to all fields of the ESP, during any of the eight 3-hour blocks of time during each day and when the emissions unit is in operation, shall be no less than 90 percent of the total combined power input, as a 3-hour average, during the most recent emissions test that demonstrated the emissions unit was in compliance with the particulate emission limitation.

III. Monitoring and/or Record Keeping Requirements

1. Coal Sampling and Analysis:

The permittee shall collect a representative sample of each shipment of coal that is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal that were received during that calendar month shall be combined into one composite sample.

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

2. Coal Usage and SO₂ Emissions Record Keeping:

The permittee shall maintain monthly records of the following:

- a. the total quantity of coal received;
- b. the results of the analyses for sulfur content;
- c. the results of the analyses for heat content; and
- d. the average SO₂ emissions (in lbs/MMBtu) calculated pursuant to the equation in OAC rule 3745-18-04(G)(1).

3. Used Oil Sampling and Analysis Record Keeping:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit during each calendar month. The permittee shall perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Hamilton County Department of Environmental Services.

4. Used Oil Usage and SO₂ Emissions Record Keeping:

For used oil burned in this emissions unit, the permittee shall maintain records of the total quantity of oil burned, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emissions (in lbs/MMBtu). The sulfur dioxide emissions shall be calculated in accordance with the equation specified in OAC rule 3745-18-04(F)(2).

5. The permittee shall monitor and record the following on an hourly basis during any operation of the ESP:

- a. the secondary voltage, in kilovolts (kV), and the secondary current in amps, for each transformer rectifier (TR) set in the ESP;
- b. the power input (in kilowatts) of each TR set for each hour (calculated by multiplying the secondary voltage (in kilovolts) by the secondary current (in amps) for each TR set); and
- c. the total power input to the ESP for each hour (add together the power inputs for the TR sets operating during the hour).

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

6. The permittee shall record the following information for each day:
 - a. all 3-hour blocks of time during which the average total combined power input to the ESP, when the emissions unit was in operation, was less than 90 percent of the total combined power input, as a 3-hour average, during the most recent emissions test that demonstrated the emissions unit was in compliance with the particulate emission limitation; and
 - b. the duration of the downtime for the monitoring equipment specified in section A.III.5 above, the ESP sections that are out of service, and the duration of the downtime for each section, when the associated emissions unit was in operation.
7. The permittee shall operate and maintain a temperature monitor and recorder that measures and records the temperature of the boiler exhaust gases entering the ESP as follows:
 - a. during all periods of start-up until the ESP is operational or until the inlet temperature of the ESP achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i); and
 - b. during all periods of shutdown until the inlet temperature to the ESP drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i).

The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in degrees Fahrenheit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each period during which the sulfur content and heat content of the fuels, as monitored pursuant to section A.III, did not comply with the sulfur dioxide emission limitation.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time during start-up and shutdown of the emissions unit when the ESP was not in operation and the temperature of the boiler exhaust gases exceeded the temperature levels specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b)(i).
3. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average total combined power input to all fields of the ESP did not comply with the operational restriction specified in section A.II.4 of this permit.
4. The permittee shall submit quarterly reports that identify the sections of the ESP that were out of service along with the time period(s) involved.
5. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

V. Testing Requirements

1. Visible Particulate Emission Limitation:

Compliance with OAC rule 3745-17-07(A)(1) shall be determined by the method specified in OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

2. Particulate Emission Limitation:

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 after issuance of this permit and approximately 2.5 years after permit issuance.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions of 0.18 lb of particulate emissions/MMBtu of actual heat input.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emissions:

Method 5 of 40 CFR, Part 60, Appendix A.

The secondary voltage and secondary current values for the ESP during the test for this emissions unit shall fall within the acceptable operating ranges established in the ESP manufacturer's specifications.

- d. The tests shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

Not later than 30 days prior to the proposed test dates, the permittee shall submit "Intent to Test" notifications to the Hamilton County Department of Environmental Services. The "Intent to Test" notifications shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Hamilton County Department of Environmental Services' refusal to accept the results of the emission tests.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the tests, 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 each emissions test shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of each test.

3. Sulfur Dioxide Emission Limitation:

- a. Compliance with the SO₂ emission limitation shall be determined by the record keeping requirements in sections A.III.2 and A.III.4 of this permit.
- b. If testing is required to demonstrate compliance with the allowable emission limitation of 1.6 lbs of SO₂/MMBtu of actual heat input, testing shall be conducted using the following method:

Method 6 of 40 CFR, Part 60, Appendix A.

VI. Miscellaneous Requirements

None

B. State 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>
145 MMBtu/hr coal-fired boiler #1 with multiclones and an ESP, using used oil as a supplemental fuel	OAC rule 3745-31-05(A)(3) (PTI 18-061)	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee may burn used oil mixed with coal in this emissions unit at a maximum rate not to exceed 10 gallons of used oil per ton of coal burned. The combined oil usage for emissions units B001, B002 and B003 shall not exceed 150,000 gallons per year. All used oil to be burned in this emissions unit shall be generated at this facility.
- Prior to combusting used oil in this emissions unit, the permittee shall perform the reporting requirements in section B.IV.2 of this permit.
- All recycled, used oil burned in this emissions unit shall meet the following specifications:

Contaminant/Property	Allowable Specification
arsenic	5 ppm, maximum
cadmium	2 ppm, maximum
chromium	10 ppm, maximum
lead	100 ppm, maximum
PCBs	10 ppm, maximum*
total halogens	4000 ppm, maximum**
mercury	1 ppm, maximum
flash point	100 degrees F, minimum
heat content	135,000 Btu/gallon, minimum

* If the permittee is burning used oil with any quantifiable level (i.e., 2 ppm) of PCBs, then the permittee is subject to the notification requirements of 40 CFR 279.62.

** Used oil containing more than 1000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under 40 CFR, Part 266.40(c) and OAC Chapter 3745-279. Therefore, the permittee may burn used oil exceeding 1000 ppm of total halogens (but less than 4000 ppm, maximum) only if the permittee has demonstrated to the Ohio EPA's Division of Hazardous Waste Management that the used oil does not contain any hazardous waste.

III. Monitoring and/or Record Keeping Requirements

1. Used Oil Sampling and Analysis:

The permittee shall collect a representative grab sample of used oil to be burned in this emissions unit. The permittee shall perform the analyses for heat content in accordance with ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Hamilton County Department of Environmental Services.

The analysis shall identify the following information:

- a. quantity of used oil burned;
- b. the Btu value of the used oil;
- c. the flash point of the used oil;
- d. the arsenic content;
- e. the cadmium content;
- f. the chromium content;
- g. the lead content;
- h. the PCB content;
- i. the total halogen content; and
- j. the mercury content.

Each analysis shall be kept in a readily accessible location for at least 5 years and shall be made available to the appropriate Ohio EPA District Office or local air agency upon verbal or written request. The Director or any authorized representative of the Director may require or may conduct periodic, detailed chemical analyses through an independent laboratory of any used oil employed by this facility, of any used oil stored at this facility, or of any used oil sampled.

- 2.** The permittee shall maintain monthly records of the total quantity of used oil burned in emissions units B001, B002 and B003, in gallons and in gallons per ton of coal burned. These records shall include the amount of oil burned that month, as well as the total amount of used oil burned to date for the calendar year.

IV. Reporting Requirements

- 1.** The permittee shall submit an annual report that summarizes the following information for the used oil burned: gallons per ton of coal for each month and gallons per year. This report shall be submitted by February 15th of each calendar year.
- 2.** The permittee shall submit deviation (excursion) reports that identify any exceedances of the allowable used oil specifications in section B.II.3 of these terms and conditions.

V. Testing Requirements

- 1.** Compliance with the used oil specifications shall be determined by the record keeping requirements in section B.III.1 of these terms and conditions.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BOILER 2 (B002)

Activity Description: 61 MMBTU/HR LASKER SPREADER STOKER 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>
61 MMBtu/hr coal-fired boiler #2 with multiclones and an electorstatic precipitator (ESP), using used oil as a supplemental fuel.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-10(C)(1)	0.18 lb of particulate emissions/MMBtu of actual heat input
	OAC rule 3745-18-19(C)	1.6 lbs of sulfur dioxide (SO2) emissions/MMBtu of actual heat input

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

- The quality of the coal burned in this emissions unit, on an as-received basis, shall have a combination of sulfur content and heat content that is sufficient to comply with the allowable SO2 emission limitation of 1.6 lbs/MMBtu of actual heat input.

Compliance with the above-mentioned specifications shall be determined by using the analytical results for the composite sample of coal collected during each calendar month.

- The quality of the used oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable SO2 emission limitation specified in section A.I above.

II. Operational Restrictions (continued)

3. The permittee shall operate the ESP during any operation of this emissions unit, except the ESP is not required to be operated during periods of start-up until the exhaust gases have achieved a temperature of 250 degrees Fahrenheit at the inlet of the ESP or during periods of shutdown when the temperature of the exhaust gases has dropped below 250 degrees Fahrenheit at the inlet of the ESP.
4. The average total combined power input (in kilowatts) to all fields of the ESP, during any of the eight 3-hour blocks of time during each day and when the emissions unit is in operation, shall be no less than 90 percent of the total combined power input, as a 3-hour average, during the most recent emissions test that demonstrated the emissions unit was in compliance with the particulate emission limitation.

III. Monitoring and/or Record Keeping Requirements

1. Coal Sampling and Analysis:

The permittee shall collect a representative sample of each shipment of coal that is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal that were received during that calendar month shall be combined into one composite sample.

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

2. Coal Usage and SO₂ Emissions Record Keeping:

The permittee shall maintain monthly records of the following:

- a. the total quantity of coal received;
- b. the results of the analyses for sulfur content;
- c. the results of the analyses for heat content; and
- d. the average SO₂ emissions (in lbs/MMBtu) calculated pursuant to the equation in OAC rule 3745-18-04(G)(1).

3. Used Oil Sampling and Analysis Record Keeping:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit during each calendar month. The permittee shall perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Hamilton County Department of Environmental Services.

4. Used Oil Usage and SO₂ Emissions Record Keeping:

For used oil burned in this emissions unit, the permittee shall maintain records of the total quantity of oil burned, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emissions (in lbs/MMBtu). The sulfur dioxide emissions shall be calculated in accordance with the equation specified in OAC rule 3745-18-04(F)(2).

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

5. The permittee shall monitor and record the following on an hourly basis during any operation of the ESP:
 - a. the secondary voltage, in kilovolts (kV), and the secondary current in amps, for each transformer rectifier (TR) set in the ESP;
 - b. the power input (in kilowatts) of each TR set for each hour (calculated by multiplying the secondary voltage (in kilovolts) by the secondary current (in amps) for each TR set); and
 - c. the total power input to the ESP for each hour (add together the power inputs for the TR sets operating during the hour).

6. The permittee shall record the following information for each day:
 - a. all 3-hour blocks of time during which the average total combined power input to the ESP, when the emissions unit was in operation, was less than 90 percent of the total combined power input, as a 3-hour average, during the most recent emissions test that demonstrated the emissions unit was in compliance with the particulate emission limitation; and
 - b. the duration of the downtime for the monitoring equipment specified in section A.III.5 above, the ESP sections that are out of service, and the duration of the downtime for each section, when the associated emissions unit was in operation.

7. The permittee shall operate and maintain a temperature monitor and recorder that measures and records the temperature of the boiler exhaust gases entering the ESP as follows:
 - a. during all periods of start-up until the ESP is operational or until the inlet temperature of the ESP achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i); and
 - b. during all periods of shutdown until the inlet temperature to the ESP drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i).

The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in degrees Fahrenheit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each period during which the sulfur content and heat content of the fuels, as monitored pursuant to section A.III, did not comply with the sulfur dioxide emission limitation.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time during start-up and shutdown of the emissions unit when the ESP was not in operation and the temperature of the boiler exhaust gases exceeded the temperature levels specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b)(i).
3. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average total combined power input to all fields of the ESP did not comply with the operational restriction specified in section A.II.4 of this permit.
4. The permittee shall submit quarterly reports that identify the sections of the ESP that were out of service along with the time period(s) involved.
5. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

V. Testing Requirements

1. Visible Particulate Emission Limitation:

Compliance with OAC rule 3745-17-07(A)(1) shall be determined by the method specified in OAC rule 3745-17-03(B)(1).

2. Particulate Emission Limitation:

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 after issuance of this permit and approximately 2.5 years after permit issuance.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions of 0.23 lb of particulate emissions/MMBtu of actual heat input.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emissions:

Method 5 of 40 CFR Part 60, Appendix A.

The secondary voltage and secondary current values for the ESP during the test for this emissions unit shall fall within the acceptable operating ranges established in the ESP manufacturer's specifications.

- d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

Not later than 30 days prior to the proposed test dates, the permittee shall submit "Intent to Test" notifications to the Hamilton County Department of Environmental Services. The "Intent to Test" notifications shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Hamilton County Department of Environmental Services' refusal to accept the results of the emission tests.

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the tests, 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 each emissions test shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of each test.

3. Sulfur Dioxide Emission Limitation:

- a. Compliance with the SO₂ emission limitation shall be determined by the record keeping requirements in sections A.III.2 and A.III.4 of this permit.

- b. If testing is required to demonstrate compliance with the allowable emission limitation of 1.6 lbs of SO₂/MMBtu of actual heat input, testing shall be conducted using the following method:

Method 6 of 40 CFR, Part 60, Appendix A.

VI. Miscellaneous Requirements

None

B. State 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>
61 MMBtu/hr coal-fired boiler #2 with multiclones and an ESP, using used oil as a supplemental fuel	OAC 3745-31-05(A)(3) (PTI 18-061)	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee may burn used oil mixed with coal in this emissions unit at a maximum rate not to exceed 10 gallons of used oil per ton of coal burned. The combined oil usage for emissions units B001, B002 and B003 shall not exceed 150,000 gallons per year. All used oil must be generated at this facility.
- Prior to combusting used oil in this emissions unit, the permittee shall perform the reporting requirements in section B.IV.2 of this permit.
- All recycled, used oil burned in this emissions unit shall meet the following specifications:

Contaminant/Property	Allowable Specification
arsenic	5 ppm, maximum
cadmium	2 ppm, maximum
chromium	10 ppm, maximum
lead	100 ppm, maximum
PCBs	10 ppm, maximum*
total halogens	4000 ppm, maximum**
mercury	1 ppm, maximum
flash point	100 degrees F, minimum
heat content	135,000 Btu/gallon, minimum

* If the permittee is burning used oil with any quantifiable level (i.e., 2 ppm) of PCBs, then the permittee is subject to the notification requirements of 40 CFR 279.62.

** Used oil containing more than 1000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under 40 CFR, Part 266.40(c) and OAC Chapter 3745-279. Therefore, the permittee may burn used oil exceeding 1000 ppm of total halogens (but less than 4000 ppm, maximum) only if the permittee has demonstrated to the Ohio EPA's Division of Hazardous Waste Management that the used oil does not contain any hazardous waste.

III. Monitoring and/or Record Keeping Requirements

1. Used Oil Sampling and Analysis:

The permittee shall collect a representative grab sample of used oil to be burned in this emissions unit. The permittee shall perform the analyses for heat content in accordance with ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

The analysis shall identify the following information:

- a. quantity of used oil burned;
- b. the Btu value of the used oil;
- c. the flash point of the used oil;
- d. the arsenic content;
- e. the cadmium content;
- f. the chromium content;
- g. the lead content;
- h. the PCB content;
- i. the total halogen content; and
- j. the mercury content.

Each analysis shall be kept in a readily accessible location for at least 5 years and shall be made available to the appropriate Ohio EPA District Office or local air agency upon verbal or written request. The Director or any authorized representative of the Director may require or may conduct periodic, detailed chemical analyses through an independent laboratory of any used oil employed by this facility, of any used oil stored at this facility, or of any used oil sampled.

- 2.** The permittee shall maintain monthly records of the total quantity of used oil burned in emissions units B001, B002 and B003, in gallons and in gallons per ton of coal burned. These records should include the amount of oil burned that month, as well as, the total amount of oil burned to date for the calendar year.

IV. Reporting Requirements

- 1.** The permittee shall submit an annual report that summarizes the following information for the used oil burned: gallons per ton of coal for each month and gallons per year. This report shall be submitted by February 15th of each calendar year.
- 2.** The permittee shall submit deviation (excursion) reports that identify any exceedances of the allowable used oil specifications in section B.II.3 of these terms and conditions.

V. Testing Requirements

- 1.** Compliance with the used oil specifications shall be determined by the record keeping requirements in section B.III.1 of these terms and conditions.

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: BOILER 3 (B003)

Activity Description: 145 MMBTU/HR LASKER SPREADER STOKER 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>
145 MMBtu/hr coal-fired boiler #3 with multiclones and an electrostatic precipitator (ESP), using used oil as a supplemental fuel	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	OAC rule 3745-17-10(C)(1)	0.18 lb of particulate emissions/MMBtu of actual heat input
	OAC rule 3745-18-19(C)	1.6 lbs of sulfur dioxide (SO ₂) emissions/MMBtu of actual heat input

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

- The quality of the coal burned in this emissions unit, on an as-received basis, shall have a combination of sulfur content and heat content that is sufficient to comply with the allowable SO₂ emission limitation of 1.6 lbs/MMBtu of actual heat input.

Compliance with the above-mentioned specifications shall be determined by using the analytical results for the composite sample of coal collected during each calendar month.
- The quality of the used oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable SO₂ emission limitation specified in section A.I above.
- The permittee shall operate the ESP during any operation of this emissions unit, except the ESP is not required to be operated during periods of start-up until the exhaust gases have achieved a temperature of 250 degrees Fahrenheit at the inlet of the ESP or during periods of shutdown when the temperature of the exhaust gases has dropped below 250 degrees Fahrenheit at the inlet of the ESP.
- The average total combined power input (in kilowatts) to all fields of the ESP, during any of the eight 3-hour blocks of time during each day and when the emissions unit is in operation, shall be no less than 90 percent of the total combined power input, as a 3-hour average, during the most recent emissions test that demonstrated the emissions unit was in compliance with the particulate emission limitation.

III. Monitoring and/or Record Keeping Requirements

1. Coal Sampling and Analysis:

The permittee shall collect a representative sample of each shipment of coal that is received for burning. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal. At the end of each calendar month, the representative samples of coal from all shipments of coal that were received during that calendar month shall be combined into one composite sample.

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

2. Coal Usage and SO₂ Emissions Record Keeping:

The permittee shall maintain monthly records of the following:

- a. the total quantity of coal received;
- b. the results of the analyses for sulfur content;
- c. the results of the analyses for heat content; and
- d. the average SO₂ emissions (in lbs/MMBtu) calculated pursuant to the equation in OAC rule 3745-18-04(G)(1).

3. Used Oil Sampling and Analysis Record Keeping:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit during each calendar month. The permittee shall perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the Hamilton County Department of Environmental Services.

4. Used Oil Usage and SO₂ Emissions Record Keeping:

For used oil burned in this emissions unit, the permittee shall maintain records of the total quantity of oil burned, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emissions (in lbs/MMBtu). The sulfur dioxide emissions shall be calculated in accordance with the equation specified in OAC rule 3745-18-04(F)(2).

5. The permittee shall monitor and record the following on an hourly basis during any operation of the ESP:

- a. the secondary voltage, in kilovolts (kV), and the secondary current in amps, for each transformer rectifier (TR) set in the ESP;
- b. the power input (in kilowatts) of each TR set for each hour (calculated by multiplying the secondary voltage (in kilovolts) by the secondary current (in amps) for each TR set); and
- c. the total power input to the ESP for each hour (add together the power inputs for the TR sets operating during the hour).

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

6. The permittee shall record the following information for each day:
 - a. all 3-hour blocks of time during which the average total combined power input to the ESP, when the emissions unit was in operation, was less than 90 percent of the total combined power input, as a 3-hour average, during the most recent emissions test that demonstrated the emissions unit was in compliance with the particulate emission limitation; and
 - b. the duration of the downtime for the monitoring equipment specified in section A.III.5 above, the ESP sections that are out of service, and the duration of the downtime for each section, when the associated emissions unit was in operation.
7. The permittee shall operate and maintain a temperature monitor and recorder that measures and records the temperature of the boiler exhaust gases entering the ESP as follows:
 - a. during all periods of start-up until the ESP is operational or until the inlet temperature of the ESP achieves the temperature level specified in OAC rule 3745-17-07(A)(3)(a)(i); and
 - b. during all periods of shutdown until the inlet temperature to the ESP drops below the temperature level specified in OAC rule 3745-17-07(A)(3)(b)(i).

The temperature monitor and recorder shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee, and shall be capable of accurately measuring the temperature of the boiler exhaust gases in degrees Fahrenheit.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each period during which the sulfur content and heat content of the fuels, as monitored pursuant to section A.III, did not comply with the sulfur dioxide emission limitation.
2. The permittee shall submit deviation (excursion) reports that identify all periods of time during start-up and shutdown of the emissions unit when the ESP was not in operation and the temperature of the boiler exhaust gases exceeded the temperature levels specified in OAC rule 3745-17-07(A)(3)(a)(i) and (b)(i).
3. The permittee shall submit deviation (excursion) reports that identify all 3-hour blocks of time during which the average total combined power input to all fields of the ESP did not comply with the operational restriction specified in section A.II.4 of this permit.
4. The permittee shall submit quarterly reports that identify the sections of the ESP that were out of service along with the time period(s) involved.
5. The deviation reports shall be submitted in accordance with the requirements specified in Part I - General Term and Condition A.1.c of this permit.

V. Testing Requirements

1. Visible Particulate Emission Limitation:

Compliance with OAC rule 3745-17-07(A)(1) shall be determined by the method specified in OAC rule 3745-17-03(B)(1).

V. Testing Requirements (continued)

2. Particulate Emission Limitation:

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 after issuance of this permit and approximately 2.5 years after permit issuance.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emissions of 0.18 lb of particulate emissions/MMBtu of actual heat input.
- c. The following test method shall be employed to demonstrate compliance with the allowable mass emissions:

Method 5 of 40 CFR, Part 60, Appendix A.

The secondary voltage and secondary current values for the ESP during the test for this emissions unit shall fall within the acceptable operating ranges established in the ESP manufacturer's specifications.

- d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Hamilton County Department of Environmental Services.

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

Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the tests, 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 each emissions test shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of each test.

3. Sulfur Dioxide Emission Limitation:

- a. Compliance with the SO₂ emission limitation shall be determined by the record keeping requirements in sections A.III.2 and A.III.4 of this permit.
- b. If testing is required to demonstrate compliance with the allowable emission limitation of 1.6 lbs of SO₂/MMBtu of actual heat input, testing shall be conducted using the following method:

Method 6 of 40 CFR, Part 60, Appendix A.

VI. Miscellaneous Requirements

None

B. State 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>
145 MMBtu/hr coal-fired boiler #3 with multiclones and an ESP, using used oil as a supplemental fuel	OAC rule 3745-31-05(A)(3) (PTI 18-061)	None

2. Additional Terms and Conditions

None

II. Operational Restrictions

- The permittee may burn used oil mixed with coal in this emissions unit at a maximum rate not to exceed 10 gallons of used oil per ton of coal burned. The combined oil usage for emissions units B001, B002 and B003 shall not exceed 150,000 gallons per year. All used oil to be burned in this emissions unit shall be generated at this facility.
- Prior to combusting used oil in this emissions unit, the permittee shall perform the reporting requirements in section B.IV.2 of this permit.
- All recycled, used oil burned in this emissions unit shall meet the following specifications:

Contaminant/Property	Allowable Specification
arsenic	5 ppm, maximum
cadmium	2 ppm, maximum
chromium	10 ppm, maximum
lead	100 ppm, maximum
PCBs	10 ppm, maximum*
total halogens	4000 ppm, maximum**
mercury	1 ppm, maximum
flash point	100 degrees F, minimum
heat content	135,000 Btu/gallon, minimum

* If the permittee is burning used oil with any quantifiable level (i.e., 2 ppm) of PCBs, then the permittee is subject to the notification requirements of 40 CFR 279.62.

** Used oil containing more than 1000 ppm total halogens is presumed to be a hazardous waste under the rebuttable presumption provided under 40 CFR, Part 266.40(c) and OAC Chapter 3745-279. Therefore, the permittee may burn used oil exceeding 1000 ppm of total halogens (but less than 4000 ppm, maximum) only if the permittee has demonstrated to the Ohio EPA's Division of Hazardous Waste Management that the used oil does not contain any hazardous waste.

III. Monitoring and/or Record Keeping Requirements

1. Used Oil Sampling and Analysis:

The permittee shall collect a representative grab sample of used oil to be burned in this emissions unit. The permittee shall perform the analyses for heat content in accordance with ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

The analysis shall identify the following information:

- a. quantity of used oil burned;
- b. the Btu value of the used oil;
- c. the flash point of the used oil;
- d. the arsenic content;
- e. the cadmium content;
- f. the chromium content;
- g. the lead content;
- h. the PCB content;
- i. the total halogen content; and
- j. the mercury content.

Each analysis shall be kept in a readily accessible location for at least 5 years and shall be made available to the appropriate Ohio EPA District Office or local air agency upon verbal or written request. The Director or any authorized representative of the Director may require or may conduct periodic, detailed chemical analyses through an independent laboratory of any used oil employed by this facility, of any used oil stored at this facility, or of any used oil sampled.

2. The permittee shall maintain monthly records of the total quantity of used oil burned in emissions units B001, B002 and B003, in gallons and in gallons per ton of coal burned. These records shall include the amount of oil burned that month, as well as the total amount of oil burned to date for the calendar year.

IV. Reporting Requirements

1. The permittee shall submit an annual report that summarizes the following information for the used oil burned: gallons per ton of coal for each month and gallons per year. This report shall be submitted by February 15th of each calendar year.
2. The permittee shall submit deviation (excursion) reports that identify any exceedances of the allowable used oil specifications in section B.II.3 of these terms and conditions.

V. Testing Requirements

1. Compliance with the used oil specifications shall be determined by the record keeping requirements in section B.III.1 of these terms and conditions.

VI. Miscellaneous Requirements

None

Facility Name: **ZF Batavia, L.L.C.**
Facility ID: **14-13-00-0187**

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