



State of Ohio Environmental Protection Agency

**RE: FINAL PERMIT TO INSTALL
BUTLER COUNTY**

CERTIFIED MAIL

Street Address:

50 West Town Street, Suite 700

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

Application No: 14-05951

Fac ID: 1409090278

DATE: 7/26/2007

Square D Company
Jim Spurlock
5735 College Corner Road
Oxford, OH 45056

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

Sincerely,

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

CC: USEPA

HCDES



STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install

FINAL PERMIT TO INSTALL 14-05951

Application Number: 14-05951
Facility ID: 1409090278
Permit Fee: **\$1600**
Name of Facility: Square D Company
Person to Contact: Jim Spurlock
Address: 5735 College Corner Road
Oxford, OH 45056

Location of proposed air contaminant source(s) [emissions unit(s)]:
5735 College Corner Road
Oxford, Ohio

Description of proposed emissions unit(s):
Installation of Two 12.56 mmBtu/hour Natural Gas and Oil-Fired Boilers.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Chris Korleski
Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 (i.e., postmarked) quarterly by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. 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

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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. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

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The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit To Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate Permit To Install for the installation or modification of any other emissions unit(s) are required for any emissions unit for which a Permit To Install is required.

12. Best Available Technology

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

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13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

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

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
PE/PM10	0.82
SO2	0.36
NOx	5.39
CO	9.06

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Square D Company
DTI Application: 11 05051

Facility ID: 1409090278

Emissions Unit ID: **B004**

VOC

1.19

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PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**A. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment - (B004) - 12.56 mmBtu/hour Cleaver Brooks Natural Gas and Oil-Fired Boiler Number 1, equipped with Low NOx burners

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See term and condition A.2.a.
OAC rule 3745-31-05(C)	See term and condition A.2.b.
OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.020 pound per mmBtu of actual heat input.
OAC rule 3745-18-06(D)	When burning Number 2 fuel oil, the emissions limitation specified by this rule is less stringent than the limitations established pursuant to 40 CFR Part 60, Subpart Dc.
40 CFR Part 60, Subpart Dc	See Section B.2.

2. Additional Terms and Conditions

- 2.a The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions, particulate matter 10 microns or less in diameter, particulate matter 2.5 microns or less in diameter, (PE/PM10/PM2.5), nitrogen oxide (NOx), volatile organic compounds (VOC), and carbon monoxide (CO) emissions from this air contaminant source since the uncontrolled potential to emit for PE/PM10/PM2.5, NOx, VOC, and CO is less than ten tons per year.
- 2.b Permit to Install 14-05951 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) under OAC rule 3745-31-05(A)(3) for sulfur dioxide (SO₂) emissions:

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- i. the maximum annual Number 2 fuel oil usage rate for this emissions unit shall not exceed 5,000 gallons per year.
 - 2.c** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency (U.S. EPA), 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency (Ohio EPA).
 - 2.d** The PE limitation specified in Section A.1 is greater than the emission unit's potential to emit. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with this emissions limitation.

B. Operational Restrictions

1. The permittee shall burn only natural gas and/or Number 2 fuel oil in this emissions unit.
2. The quality of Number 2 fuel oil received for burning in this emissions unit shall contain less than or equal to 0.5 weight percent sulfur.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain daily records of the quantity and type of fuel combusted in this emissions unit during each operating day.
2. The permittee shall collect and record the following information annually for the purpose of determining annual SO₂ emissions:
 - a. The total number of gallons of Number 2 fuel oil combusted;
 - b. The total quantity of natural gas combusted in mmcf; and
 - c. the total SO₂ emissions from all fuels combusted, in tons, using the calculation methods provided in Section E.1 and replacing any voluntary restriction amounts with the actual amounts as recorded in (a) and (b) above.
3. Pursuant to NSPS 40 CFR Part 60.42c(h), the permittee shall maintain oil supplier certifications for the fuel oil received for burning in this emissions unit that contain the

Emissions Unit ID: **B004**

following information:

- a. The name of the oil supplier;
- b. A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil pursuant to 40 CFR Part 60.41c; and
- c. The sulfur content of the oil, in weight percent.

D. Reporting Requirements

1. Pursuant to the NSPS, the permittee is required to report the following information at the appropriate times (if the information has not already been reported):
 - a. construction date (no later than 30 days after such date);
 - b. actual start-up date (within 15 days after such date); and,
 - c. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Hamilton County Department of Environmental Services
250 William Howard Taft Road
Cincinnati, OH 45219

2. The permittee shall notify Hamilton County Department of Environmental Services in writing of any fuel burned in this emissions unit other than natural gas or Number 2 fuel oil. The notification shall include a copy of such record and shall be sent to Hamilton County Department of Environmental Services within 45 days after the deviation occurs.
3. The permittee shall submit quarterly reports to Hamilton County Department of Environmental Services of any exceedance of the fuel oil sulfur content limitation specified in Section B.2. If no exceedances occurred, the permittee shall state so in the report. The quarterly reports shall also contain records of the oil supplier certification for all fuel oil combusted during the reporting period including a certified statement by a responsible official that the certification records submitted represent all of the fuel oil combusted during the reporting period. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through

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June and July through September, respectively).

E. Testing Requirements

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

- a. Emission Limitation:

Particulate emissions shall not exceed 0.020 pound per mmBtu of actual heat input.

Applicable Compliance Method:

For the use of natural gas, compliance shall be determined by multiplying the hourly gas burning capacity of the emissions unit (mm cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 7.6 lbs of total PM/mm cu. ft, and then dividing by the maximum hourly heat input of the emissions unit (mmBtu/hr).

For the use of Number 2 fuel oil, compliance shall be determined by multiplying the hourly fuel oil burning capacity of the emissions unit (in 1000 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2 lbs of PM/1000 gallons, and then dividing by the maximum hourly heat input of the emissions unit (mmBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5.

- b. Emission Limitation:

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

Applicable Compliance Method:

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

Emissions Unit ID: **B004**c. Emission Limitation:

The potential to emit is less than 10.0 tons per year SO₂ based on a voluntary fuel oil restriction of 5000 gallons per year.

Applicable Compliance Method:

The annual SO₂ emission rate is based on a voluntary restriction on the potential to emit established through OAC rule 3745-31-02(A) from the combustion of Number 2 fuel oil. The annual SO₂ emission rate for both the combustion of natural gas and restricted fuel oil usage was calculated by the following equations using the information submitted by the permittee in PTI Application 14-05951, submitted on May 25, 2007:

For natural gas combustion:

$E = \text{heat input capacity of } 12.56 \text{ mmBtu/hour} \times 0.0006 \text{ lbs SO}_2/\text{mmBtu per AP-42 Table 1.4-2 for natural gas combustion} \times 8760 \text{ hours}/(2000)]; \text{ and}$

Emissions Unit ID: **B004**

For Number 2 fuel oil combustion:

$E = 71 \text{ lbs SO}_2/1000 \text{ gals per AP-42 Table 1.3-1 for fuel oil combustion} \times 5000 \text{ gallons fuel oil per year}/(2000)$];

where E = Emission Rate (tons per year).

d. Emission Limitation:

The uncontrolled potential to emit is less than 10.0 tons per year PE/PM10/PM2.5.

Applicable Compliance Method:

The annual PE/PM10/PM2.5 emissions rate is based on this emission unit's uncontrolled potential to emit from the combustion of natural gas or Number 2 fuel oil. PM10 and PM2.5 emissions shall be assumed to be equivalent to PE. The annual PE/PM10/PM2.5 emission rates were calculated by the following equations using the information submitted by the permittee in PTI Application 14-05951, submitted on May 25, 2007:

For natural gas combustion:

$E = \text{heat input capacity of } 12.56 \text{ mmBtu/hour} \times 0.007 \text{ lbs PE/mmBtu per AP-42 Table 1.4-2 for natural gas combustion} \times 8760 \text{ hours}/(2000)$]; and

For Number 2 fuel oil combustion:

$E = 2 \text{ lbs PM}/1000 \text{ gals per AP-42 Table 1.3-1 for fuel oil combustion} \times 5000 \text{ gallons fuel oil per year}/(2000)$];

where E = Emission Rate (tons per year).

e. Emission Limitation:

The uncontrolled potential to emit is less than 10.0 tons per year VOC.

Applicable Compliance Method:

The annual VOC emissions rate is based on this emission unit's uncontrolled potential to emit from the combustion of natural gas or Number 2 fuel oil. The

Emissions Unit ID: **B004**

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annual VOC emissions rate was calculated by the following equations using the information submitted by the permittee in PTI Application 14-05951, submitted on May 25, 2007:

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For natural gas combustion:

$E = \text{heat input capacity of } 12.56 \text{ mmBtu/hour} \times 0.011 \text{ lbs VOC/mmBtu per AP-42 Table 1.4-2 for natural gas combustion} \times 8760 \text{ hours}/(2000)]; \text{ and}$

For Number 2 fuel oil combustion:

$E = 0.252 \text{ lbs TOC}/1000 \text{ gals per AP-42 Table 1.3-3 for fuel oil combustion} \times 5000 \text{ gallons fuel oil per year}/(2000)];$

where E = Emission Rate (tons per year).

f. Emission Limitation:

The uncontrolled potential to emit is less than 10.0 tons per year CO.

Applicable Compliance Method:

The annual CO emissions rate is based on this emission unit's uncontrolled potential to emit from the combustion of natural gas or Number 2 fuel oil. The annual CO emissions rate was calculated by the following equations using the information submitted by the permittee in PTI Application 14-05951, submitted on May 25, 2007:

For natural gas combustion:

$E = \text{heat input capacity of } 12.56 \text{ mmBtu/hour} \times 0.082 \text{ lbs CO/mmBtu per AP-42 Table 1.4-1 for natural gas combustion} \times 8760 \text{ hours}/(2000)]; \text{ and}$

For Number 2 fuel oil combustion:

$E = 5 \text{ lbs CO}/1000 \text{ gals per AP-42 Table 1.3-1 for fuel oil combustion} \times 5000 \text{ gallons fuel oil per year}/(2000)];$

where E = Emissions Rate (tons per year).

g. Emission Limitation:

The uncontrolled potential to emit is less than 10.0 tons per year NOx.

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Applicable Compliance Method:

The annual NOx emissions rate is based on this emission unit's uncontrolled potential to emit from the combustion of natural gas or Number 2 fuel oil. The annual uncontrolled NOx emissions rate was calculated by the following equations using the information submitted by the permittee in PTI Application 14-05951, submitted on May 25, 2007:

For natural gas combustion:

$E = \text{heat input capacity of } 12.56 \text{ mmBtu/hour} \times 0.098 \text{ lbs NOx/mmBtu per AP-42 Table 1.4-1 for natural gas combustion} \times 8760 \text{ hours}/(2000)]; \text{ and}$

For Number 2 fuel oil combustion:

$E = 20 \text{ lbs NOx}/1000 \text{ gals per AP-42 Table 1.3-1 for fuel oil combustion} \times 5000 \text{ gallons fuel oil per year}/(2000)];$

where E = Emissions Rate (tons per year).

Actual annual NOx emissions may be calculated by multiplying the uncontrolled NOx emissions above by 50% control efficiency for the use of low NOx burners in this emission unit.

h. Emission Limitation:

The sulfur content of the fuel oil shall not exceed 0.5 percent by weight.

Applicable Compliance Method:

Compliance with the fuel oil sulfur content limitation shall be demonstrated by the record of the fuel supplier certification required in term and condition C.3.

F. Miscellaneous Requirements

None

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment - (B005) - 12.56 mmBtu/hour Cleaver Brooks Natural Gas and Oil-Fired Boiler Number 3, equipped with Low NOx burners

Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
ORC 3704.03(T)(4)	See term and condition A.2.a.
OAC rule 3745-31-05(C)	See term and condition A.2.b.
OAC rule 3745-17-07(A)(1)	Visible particulate emissions from any stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as specified by rule.
OAC rule 3745-17-10(B)(1)	Particulate emissions (PE) shall not exceed 0.020 pound per mmBtu of actual heat input.
OAC rule 3745-18-06(D)	When burning Number 2 fuel oil, the emissions limitation specified by this rule is less stringent than the limitations established pursuant to 40 CFR Part 60, Subpart Dc.
40 CFR Part 60, Subpart Dc	See Section B.2.

2. Additional Terms and Conditions

- 2.a** The Best Available Technology (BAT) requirements under OAC rule

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3745-31-05(A)(3) do not apply to the particulate emissions, particulate matter 10 microns or less in diameter, particulate matter 2.5 microns or less in diameter,(PE/PM10/PM2.5), nitrogen oxide (NO_x), volatile organic compounds (VOC), and carbon monoxide (CO) emissions from this air contaminant source since the uncontrolled potential to emit for PE/PM10/PM2.5, NO_x, VOC, and CO is less than ten tons per year.

- 2.b** Permit to Install 14-05951 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) under OAC rule 3745-31-05(A)(3) for sulfur dioxide (SO₂) emissions:
 - i. the maximum annual Number 2 fuel oil usage rate for this emissions unit shall not exceed 5,000 gallons per year.
- 2.c** The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency (U.S. EPA), 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency (Ohio EPA).
- 2.d** The PE limitation specified in Section A.1 is greater than the emission unit's potential to emit. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with this emissions limitation.

B. Operational Restrictions

- 1. The permittee shall burn only natural gas and/or Number 2 fuel oil in this emissions unit.
- 2. The quality of Number 2 fuel oil received for burning in this emissions unit shall contain less than or equal to 0.5 weight percent sulfur.

C. Monitoring and/or Recordkeeping Requirements

- 1. The permittee shall maintain daily records of the quantity and type of fuel combusted in this emissions unit during each operating day.
- 2. The permittee shall collect and record the following information annually for the purpose of determining annual SO₂ emissions:

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- a. The total number of gallons of Number 2 fuel oil combusted;
 - b. The total quantity of natural gas combusted in mmcf; and
 - c. the total SO₂ emissions from all fuels combusted, in tons, using the calculation methods provided in Section E.1 and replacing any voluntary restriction amounts with the actual amounts as recorded in (a) and (b) above.
3. Pursuant to NSPS 40 CFR Part 60.42c(h), the permittee shall maintain oil supplier certifications for the fuel oil received for burning in this emissions unit that contain the following information:
- a. The name of the oil supplier;
 - b. A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil pursuant to 40 CFR Part 60.41c; and
 - c. The sulfur content of the oil, in weight percent.

D. Reporting Requirements

1. Pursuant to the NSPS, the permittee is required to report the following information at the appropriate times (if the information has not already been reported):
 - a. construction date (no later than 30 days after such date);
 - b. actual start-up date (within 15 days after such date); and,
 - c. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Hamilton County Department of Environmental Services
250 William Howard Taft Road
Cincinnati, OH 45219

2. The permittee shall notify Hamilton County Department of Environmental Services in writing of any fuel burned in this emissions unit other than natural gas or Number 2 fuel oil. The notification shall include a copy of such record and shall be sent to Hamilton County Department of Environmental Services within 45 days after the deviation

Emissions Unit ID: B005

occurs.

3. The permittee shall submit quarterly reports to Hamilton County Department of Environmental Services of any exceedance of the fuel oil sulfur content limitation specified in Section B.2. If no exceedances occurred, the permittee shall state so in the report. The quarterly reports shall also contain records of the oil supplier certification for all fuel oil combusted during the reporting period including a certified statement by a responsible official that the certification records submitted represent all of the fuel oil combusted during the reporting period. The reports shall be submitted by January 31, April 30, July 31 and October 31 of each year and shall cover the previous calendar quarters (October through December, January through March, April through June and July through September, respectively).

E. Testing Requirements

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

- a. Emission Limitation:

Particulate emissions shall not exceed 0.020 pound per mmBtu of actual heat input.

Applicable Compliance Method:

For the use of natural gas, compliance shall be determined by multiplying the hourly gas burning capacity of the emissions unit (mm cu. ft/hr) by the AP-42, Fifth Edition, Section 1.4, Table 1.4-2 (revised 7/98) emission factor of 7.6 lbs of total PM/mm cu. ft, and then dividing by the maximum hourly heat input of the emissions unit (mmBtu/hr).

For the use of Number 2 fuel oil, compliance shall be determined by multiplying the hourly fuel oil burning capacity of the emissions unit (in 1000 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2 lbs of PM/1000 gallons, and then dividing by the maximum hourly heat input of the emissions unit (mmBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/mmBtu emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1- 5.

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b. Emission Limitation:

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

Applicable Compliance Method:

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

c. Emission Limitation:

The potential to emit is less than 10.0 tons per year SO₂ based on a voluntary fuel oil restriction of 5000 gallons per year.

Applicable Compliance Method:

The annual SO₂ emission rate is based on a voluntary restriction on the potential to emit established through OAC rule 3745-31-02(A) from the combustion of Number 2 fuel oil. The annual SO₂ emission rate for both the combustion of natural gas and restricted fuel oil usage was calculated by the following equations using the information submitted by the permittee in PTI Application 14-05951, submitted on May 25, 2007:

For natural gas combustion:

$E = \text{heat input capacity of } 12.56 \text{ mmBtu/hour} \times 0.0006 \text{ lbs SO}_2/\text{mmBtu per AP-42 Table 1.4-2 for natural gas combustion} \times 8760 \text{ hours}/(2000)]; \text{ and}$

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For Number 2 fuel oil combustion:

$E = 71 \text{ lbs SO}_2/1000 \text{ gals per AP-42 Table 1.3-1 for fuel oil combustion} \times 5000 \text{ gallons fuel oil per year}/(2000)$];

where E = Emission Rate (tons per year).

d. Emission Limitation:

The uncontrolled potential to emit is less than 10.0 tons per year PE/PM10/PM2.5.

Applicable Compliance Method:

The annual PE/PM10/PM2.5 emissions rate is based on this emission unit's uncontrolled potential to emit from the combustion of natural gas or Number 2 fuel oil. PM10 and PM2.5 emissions shall be assumed to be equivalent to PE. The annual PE/PM10/PM2.5 emission rates were calculated by the following equations using the information submitted by the permittee in PTI Application 14-05951, submitted on May 25, 2007:

For natural gas combustion:

$E = \text{heat input capacity of } 12.56 \text{ mmBtu/hour} \times 0.007 \text{ lbs PE/mmBtu per AP-42 Table 1.4-2 for natural gas combustion} \times 8760 \text{ hours}/(2000)$]; and

For Number 2 fuel oil combustion:

$E = 2 \text{ lbs PM}/1000 \text{ gals per AP-42 Table 1.3-1 for fuel oil combustion} \times 5000 \text{ gallons fuel oil per year}/(2000)$];

where E = Emission Rate (tons per year).

e. Emission Limitation:

The uncontrolled potential to emit is less than 10.0 tons per year VOC.

Applicable Compliance Method:

The annual VOC emissions rate is based on this emission unit's uncontrolled potential to emit from the combustion of natural gas or Number 2 fuel oil. The

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annual VOC emissions rate was calculated by the following equations using the information submitted by the permittee in PTI Application 14-05951, submitted on May 25, 2007:

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For natural gas combustion:

$E = \text{heat input capacity of } 12.56 \text{ mmBtu/hour} \times 0.011 \text{ lbs VOC/mmBtu per AP-42 Table 1.4-2 for natural gas combustion} \times 8760 \text{ hours}/(2000)]; \text{ and}$

For Number 2 fuel oil combustion:

$E = 0.252 \text{ lbs TOC}/1000 \text{ gals per AP-42 Table 1.3-3 for fuel oil combustion} \times 5000 \text{ gallons fuel oil per year}/(2000)];$

where E = Emission Rate (tons per year).

f. Emission Limitation:

The uncontrolled potential to emit is less than 10.0 tons per year CO.

Applicable Compliance Method:

The annual CO emissions rate is based on this emission unit's uncontrolled potential to emit from the combustion of natural gas or Number 2 fuel oil. The annual CO emissions rate was calculated by the following equations using the information submitted by the permittee in PTI Application 14-05951, submitted on May 25, 2007:

For natural gas combustion:

$E = \text{heat input capacity of } 12.56 \text{ mmBtu/hour} \times 0.082 \text{ lbs CO/mmBtu per AP-42 Table 1.4-1 for natural gas combustion} \times 8760 \text{ hours}/(2000)]; \text{ and}$

For Number 2 fuel oil combustion:

$E = 5 \text{ lbs CO}/1000 \text{ gals per AP-42 Table 1.3-1 for fuel oil combustion} \times 5000 \text{ gallons fuel oil per year}/(2000)];$

where E = Emissions Rate (tons per year).

g. Emission Limitation:

The uncontrolled potential to emit is less than 10.0 tons per year NOx.

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Applicable Compliance Method:

The annual NOx emissions rate is based on this emission unit's uncontrolled potential to emit from the combustion of natural gas or Number 2 fuel oil. The annual uncontrolled NOx emissions rate was calculated by the following equations using the information submitted by the permittee in PTI Application 14-05951, submitted on May 25, 2007:

For natural gas combustion:

$E = \text{heat input capacity of } 12.56 \text{ mmBtu/hour} \times 0.098 \text{ lbs NOx/mmBtu per AP-42 Table 1.4-1 for natural gas combustion} \times 8760 \text{ hours}/(2000)]; \text{ and}$

For Number 2 fuel oil combustion:

$E = 20 \text{ lbs NOx}/1000 \text{ gals per AP-42 Table 1.3-1 for fuel oil combustion} \times 5000 \text{ gallons fuel oil per year}/(2000)];$

where E = Emissions Rate (tons per year).

Actual annual NOx emissions may be calculated by multiplying the uncontrolled NOx emissions above by 50% control efficiency for the use of low NOx burners in this emission unit.

h. Emission Limitation:

The sulfur content of the fuel oil shall not exceed 0.5 percent by weight.

Applicable Compliance Method:

Compliance with the fuel oil sulfur content limitation shall be demonstrated by the record of the fuel supplier certification required in term and condition C.3.

F. Miscellaneous Requirements

None

Emissions Unit ID: B005

SIC CODE 3612, 3613 SCC CODE 1-01-006-02, 1-02-005-02 EMISSIONS UNIT ID B004

EMISSIONS UNIT DESCRIPTION 12.56 mmBtu/hour Cleaver Brooks Natural Gas and Oil-Fired Boiler Number 1, equipped with Low NOx burners

DATE INSTALLED 4/2005

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.007 lbs/mmBtu (gas) 0.014 lb/mmBtu (oil)	0.24	0.007 lbs/mmBtu (gas) 0.014 lb/mmBtu (oil)	0.41(gas)
PM ₁₀	nonattainment as PM2.5	0.007 lbs/mmBtu (gas) 0.014 lb/mmBtu (oil)	0.24	0.007 lbs/mmBtu (gas) 0.014 lb/mmBtu (oil)	0.41 (gas)
Sulfur Dioxide	attainment	0.0006 lbs/mmBtu (gas) 0.508 lb/mmBtu (oil)	0.18	0.0006 lbs/mmBtu (gas) 0.508 lb/mmBtu (oil)	0.18 (oil)
Organic Compounds	nonattainment	0.011 lbs/mmBtu (gas) 0.002 lb/mmBtu (oil)	0.35	0.011 lbs/mmBtu (gas) 0.002 lb/mmBtu (oil)	0.59 (gas)
Nitrogen Oxides	attainment	0.049 lbs/mmBtu (gas) 0.072 lb/mmBtu (oil)	1.6	0.049 lbs/mmBtu (gas) 0.072 lb/mmBtu (oil)	2.70 (gas)
Carbon Monoxide	attainment	0.082 lbs/mmBtu (gas) 0.036 lb/mmBtu (oil)	2.69	0.082 lbs/mmBtu (gas) 0.036 lb/mmBtu (oil)	4.53 (gas)
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? Dc

NESHAP?

PSD?

OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

Square D Company
PTI Application: 14-05951
Issued: 7/26/2007

Facility ID: 1409090278

Emissions Unit ID: B005

BAT is not applicable - PTE <10 TPY

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? NO

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to containinants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: NA

Emissions Unit ID: **B005****Issued: 7/26/2007**

SIC CODE 3612, 3613 SCC CODE 1-01-006-02, 1-02-005-02 EMISSIONS UNIT ID B005
 EMISSIONS UNIT DESCRIPTION 12.56 mmBtu/hour Cleaver Brooks Natural Gas and Oil-Fired Boiler Number 3, equipped with Low NOx burners
 DATE INSTALLED 4/2005

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	attainment	0.007 lbs/mmBtu (gas) 0.014 lb/mmBtu (oil)	0.24	0.007 lbs/mmBtu (gas) 0.014 lb/mmBtu (oil)	0.41(gas)
PM ₁₀	nonattainment as PM2.5	0.007 lbs/mmBtu (gas) 0.014 lb/mmBtu (oil)	0.24	0.007 lbs/mmBtu (gas) 0.014 lb/mmBtu (oil)	0.41 (gas)
Sulfur Dioxide	attainment	0.0006 lbs/mmBtu (gas) 0.508 lb/mmBtu (oil)	0.18	0.0006 lbs/mmBtu (gas) 0.508 lb/mmBtu (oil)	0.18 (oil)
Organic Compounds	nonattainment	0.011 lbs/mmBtu (gas) 0.002 lb/mmBtu (oil)	0.35	0.011 lbs/mmBtu (gas) 0.002 lb/mmBtu (oil)	0.59 (gas)
Nitrogen Oxides	attainment	0.049 lbs/mmBtu (gas) 0.072 lb/mmBtu (oil)	1.6	0.049 lbs/mmBtu (gas) 0.072 lb/mmBtu (oil)	2.70 (gas)
Carbon Monoxide	attainment	0.082 lbs/mmBtu (gas) 0.036 lb/mmBtu (oil)	2.69	0.082 lbs/mmBtu (gas) 0.036 lb/mmBtu (oil)	4.53 (gas)
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? Dc

NESHAP?

PSD?

OFFSET POLICY?

Square D Company
PTI Application: 14-05951
Issued: 7/26/2007

Facility ID: 1409090278

Emissions Unit ID: B005

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?

BAT is not applicable - PTE <10 TPY

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? \$NA

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? YES X NO

IDENTIFY THE AIR CONTAMINANTS: NA