

Facility ID: 1409000003 Issuance type: Title V Final Permit

This version of facility specific terms and conditions was converted from a database format to an HTML file during an upgrade of the Ohio EPA, Division of Air Pollution Control's permitting software. Every attempt has been made to convert the terms and conditions to look and substantively conform to the permit issued or being drafted in STARS. However, the format of the terms may vary slightly from the original. In addition, although it is not expected, there is a slight possibility that a term and condition may have been inadvertently "left out" of this reproduction during the conversion process. Therefore, if this version is to be used as a starting point in drafting a new version of a permit, it is imperative that the entire set of terms and conditions be reviewed to ensure they substantively mimic the issued permit. The official version of any permit issued final by Ohio EPA is kept in the Agency's Legal section. The Legal section may be contacted at (614) 644-3037.

In addition to the terms and conditions, hyperlinks have been inserted into the document so you may more readily access the section of the document you wish to review.

Finally, the term language under "Part III" and before "I. Applicable Emissions Limitations..." has been added to aid in document conversion, and was not part of the original issued permit.

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## Part II - Specific Facility Terms and Conditions

### a State and Federally Enforceable Section

1. This facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

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### b State Only Enforceable Section

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

F001 Plant Roadways and Parking Areas;  
F002 Material Handling, Truck Hauling, Coal Unloading and Coal Conveying/Transfer;  
F003 Coal Stockpiling;  
P001 Paper Machine No. 4;  
P002 Paper Machine No. 5;  
P003 Paper Machine No. 6;  
T001 15,000-Gallon No. 2 Fuel Oil Tank;  
Z001 Secondary Fiber Hydrapulper System;  
Z007 Safety Kleen Parts Washer;  
Z008 10,000-Gallon Melamine Formaldehyde Wet Strength Resin Tank #1 (vapor pressure < 0.4 psia);  
Z009 10,000-Gallon Melamine Formaldehyde Wet Strength Resin Tank #2 (vapor pressure < 0.4 psia); and  
Z010 Wastewater Treatment System.

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

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**Part III - Terms and Conditions for Emissions Units**

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Facility ID: 140900003 Emissions Unit ID: B001 Issuance type: Title V Final Permit

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
122.5 MMBtu/hr pulverized coal and No. 2 fuel oil-fired boiler controlled with cyclones and an electrostatic precipitator (ESP) - No. 4 Boiler	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)(1)	0.020 lb of PE/MMBtu of actual heat input when burning No. 2 fuel oil
	OAC rule 3745-17-10(C)(1)	0.19 lb of PE/MMBtu of actual heat input when burning coal
	OAC rule 3745-18-15(B)	1.6 lbs of sulfur dioxide (SO <sub>2</sub> )/MMBtu of actual heat input

**2. Additional Terms and Conditions**

- (a) None

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**II. Operational Restrictions**

1. The quality of the coal burned in this emissions unit shall meet the following specifications on an "as-received" wet basis:
  - a. a combination of ash content and heat content which is sufficient to comply with the allowable particulate emission limitation of 0.19 lb of PE/MMBtu of actual heat input after treatment by the cyclones and ESP; and
  - b. a combination of sulfur content and heat content which is sufficient to comply with the allowable SO<sub>2</sub> emission limitation of 1.6 lbs of SO<sub>2</sub>/MMBtu of actual heat input.
2. The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable SO<sub>2</sub> emission limitation specified in section A.1.1 above.
3. When burning coal, the permittee shall operate the ESP during any operation of this emissions unit, except during periods of start-up and shutdown that are exempted pursuant to OAC rules 3745-17-07(A)(3)(a)(i) and 3745-17-07(A)(3)(b)(i), or during malfunctions that are exempted pursuant to OAC rule 3745-17-07(A)(3)(c).
4. The average total combined power input (in kilowatts) to all fields of the ESP, for any 3-hour block of time 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 emission tests that demonstrated the emissions unit was in compliance with the particulate emission limitation. Based on the voltage and current data from the most recent emission tests that demonstrated that the emissions unit was in compliance, the minimum total combined power input is 2.3 kilowatts.

The operation of the control equipment below the minimum total combined power input level specified above may or may not indicate a mass emission and/or visible emission violation. If required by the Hamilton County Department of Environmental Services, compliance with the mass emission limitation and visible emission limitations shall be determined by performing concurrent mass emission tests and visible emissions observations, using USEPA-approved methods and procedures. The results of any required

emission tests and visible emission observations shall be used in determining whether or not the operation of the control equipment below the minimum total combined power input level specified above is indicative of a possible violation of the mass emission limitation and/or visible emission limitations.

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### III. Monitoring and/or Record Keeping Requirements

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

Each monthly composite sample of coal shall be analyzed for ash content (percent), sulfur content (percent), and heat content (Btu/pound of coal). The analytical methods for ash content, sulfur content and heat content shall be: ASTM method D3174, Ash in the Analysis of Coal and Coke; ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865, Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval from the Hamilton County Department of Environmental Services.

2. The permittee shall maintain monthly records of the total quantity of coal received, the results of the analyses for ash content, sulfur content, and heat content, and the calculated average SO<sub>2</sub> emission rate for the month, in lbs/MMBtu of actual heat input.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO<sub>2</sub> emission rate (in lbs/MMBtu). (The SO<sub>2</sub> emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

4. 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 during:
  - a. 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. all periods of shutdown until the inlet temperature of 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 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 units of degrees Fahrenheit.

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 milliamps, 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 milliamps/1000) 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).

Should a mechanical failure occur which prevents the secondary voltage and current data from being monitored and recorded, the primary voltage and current data shall be monitored and recorded in lieu of the secondary voltage and current data and shall be used to calculate the total power input to the ESP in accordance with sections A.III.5.a through A.III.5.c above. The permittee shall make all necessary repairs to correct any mechanical failure which prevents the secondary voltage from being monitored and recorded as soon as practical, but not to exceed 60 days after the occurrence.

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### IV. Reporting Requirements

1. Quarterly reports shall be submitted concerning the quantity and quality of coal received for burning in this emissions unit. These reports shall include the following information for the emissions unit for each calendar month during the calendar quarter:
  - a. the total quantity of coal received (tons);
  - b. the average ash content (percent) of the coal received;
  - c. the average sulfur content (percent) of the coal received;

- d. the average heat content (Btu/pound) of the coal received; and
  - e. the calculated average SO<sub>2</sub> emission rate (lbs of SO<sub>2</sub>/MMBtu of actual heat input) from the coal received.
2. The permittee shall notify the Director (the Hamilton County Department of Environmental Services) in writing of any record which shows a deviation of the allowable SO<sub>2</sub> emission limitation based upon the calculated SO<sub>2</sub> emission rates from section A.III above. The notification shall include a copy of such record and shall be sent to the Director (the Hamilton County Department of Environmental Services) within 45 days after the deviation occurs.
  3. The permittee shall submit quarterly 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, coal was being burned, and the temperature of the boiler exhaust gases exceeded the temperature levels specified in OAC rules 3745-17-07(A)(3)(a)(i) and (b)(i). The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii.
  4. 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 does not comply with the operational restriction specified in section A.II.4 of this permit. The quarterly deviation reports shall be submitted in accordance with General Term and Condition A.1.c.ii.

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#### V. Testing Requirements

1. Emission Limitation-  
Visible PE from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.  
  
Applicable Compliance Method-  
If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).
2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emission testing shall be conducted approximately 2.5 years after permit issuance, and within 6 months prior to permit expiration.
  - b. The emission testing shall be conducted to demonstrate compliance with the allowable particulate mass emission rate of 0.19 lb of PE/MMBtu of actual heat input, when burning coal.
  - c. The following test methods shall be employed to demonstrate compliance with the allowable particulate mass emission rate:  
  
Methods 1 through 5 of 40 CFR Part 60, Appendix A.  
  
d. During the test, the primary and secondary voltage and current at each ESP TR set shall be recorded at least every 15 minutes.  
  
The recorded primary and secondary voltage and current values shall be used to establish the minimum total power input value(s) that correspond to the proper operation of the ESP serving this emissions unit during the emission tests that demonstrate that the emissions unit is in compliance with the applicable emission limitations.
  - e. 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 time(s) and date(s) of the test, and the person(s) who will be conducting the test. Failure to submit such notification for review and approval prior to the test(s) may result in the Hamilton County Department of Environmental Services' refusal to accept the results of the emission test.  
  
Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the test, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.  
  
A comprehensive written report on the results of the emission tests 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 the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.
3. Emission Limitation-  
0.020 lb of PE/MMBtu of actual heat input when burning No. 2 fuel oil  
  
Applicable Compliance Method-  
Compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (3000 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions

unit (122.5 MMBtu/hr).

If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation above in accordance with OAC rule 3745-17-03(B)(9).

- 4. Emission Limitation-  
1.6 lbs of SO2/MMBtu of actual heat input

Applicable Compliance Method-  
Compliance with the SO2 emission limitation may be demonstrated based upon the records required pursuant to sections A.III.1 through A.III.3 of this permit.

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

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VI. **Miscellaneous Requirements**

- 1. None

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**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

- 1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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2. **Additional Terms and Conditions**

- 1. None

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II. **Operational Restrictions**

- 1. None

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III. **Monitoring and/or Record Keeping Requirements**

- 1. None

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IV. **Reporting Requirements**

- 1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None

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**Part III - Terms and Conditions for Emissions Units**

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**Facility ID: 140900003 Emissions Unit ID: B002 Issuance type: Title V Final Permit**

**A. State and Federally Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

I. **Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
75 MMBtu/hr No. 2 oil-fired boiler - No. 3 Boiler	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.
	OAC rule 3745-17-10(B)(1)	0.020 lb of PE/MMBtu of actual heat input
	OAC rule 3745-18-15(B)	1.6 lbs of sulfur dioxide (SO <sub>2</sub> )/MMBtu of actual heat input

2. **Additional Terms and Conditions**
  - (a) None

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II. **Operational Restrictions**

1. The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable SO<sub>2</sub> emission limitation specified in section A.1.1 above.
2. The permittee shall burn only No. 2 fuel oil in this emissions unit.

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III. **Monitoring and/or Record Keeping Requirements**

1. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO<sub>2</sub> emission rate (in lbs/MMBtu). (The SO<sub>2</sub> emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.  
  
The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.
2. For each day during which the permittee burns a fuel other than No. 2 fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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**IV. Reporting Requirements**

1. The permittee shall notify the Director (the Hamilton County Department of Environmental Services) in writing of any record which shows a deviation of the allowable SO<sub>2</sub> emission limitation based upon the calculated SO<sub>2</sub> emission rates from section A.III above. The notification shall include a copy of such record and shall be sent to the Director (the Hamilton County Department of Environmental Services) within 45 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than No. 2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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**V. Testing Requirements**

1. Emission Limitation-  
Visible PE from any stack shall not exceed 20 percent opacity, as a 6-minute average, except as specified by rule.  
  
Applicable Compliance Method-  
If required, compliance shall be determined through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1).
2. Emission Limitation-  
0.020 lb of PE/MMBtu of actual heat input  
  
Applicable Compliance Method-  
Compliance may be determined by multiplying the maximum fuel oil capacity of the emissions unit (2500 gallons/hr) by the AP-42, Fifth Edition, Section 1.3, Table 1.3-1 (revised 9/98) emission factor of 2.0 lbs filterable PE/1000 gallons, and then dividing by the maximum hourly heat input capacity of the emissions unit (75 MMBtu/hr).  
  
If required, the permittee shall demonstrate compliance with the lb/MMBtu emission limitation through emission tests performed in accordance with OAC rule 3745-17-03(B)(9).
3. Emission Limitation-  
1.6 lbs of SO<sub>2</sub>/MMBtu of actual heat input  
  
Applicable Compliance Method-  
Compliance with the allowable SO<sub>2</sub> emission limitation may be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.  
  
If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6C.

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**VI. Miscellaneous Requirements**

1. None

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**B. State Enforceable Section**

The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

1. None.

**I. Applicable Emissions Limitations and/or Control Requirements**

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

	<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
2.	<b>Additional Terms and Conditions</b>		
1.	None		

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II. **Operational Restrictions**

1. None

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III. **Monitoring and/or Record Keeping Requirements**

1. None

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IV. **Reporting Requirements**

1. None

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V. **Testing Requirements**

1. None

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VI. **Miscellaneous Requirements**

1. None