



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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Columbus, Ohio 43215

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9/23/2008

Certified Mail

Priscilla Mobley
NASA John H. Glenn Research Center - Lewis Field
21000 Brookpark Road
M/S 6-4
Cleveland, OH 44135-3191

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 1318001169
Permit Number: 13-04747
Permit Type: Initial Installation
County: Cuyahoga

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, The Plain Dealer. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page <http://www.epa.state.oh.us/dapc> in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Cleveland Division of Air Quality
Penton Media Building, 4th Floor
1300 East 9th Street
Cleveland, OH 44114

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Cleveland Division of Air Quality at (216)664-2297.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA
CDAQ; Pennsylvania; Canada

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

PUBLIC NOTICE
Issuance Of Draft Air Pollution Permit-To-Install
NASA John H. Glenn Research Center - Lewis Field

Issue Date: 9/23/2008

Permit Number: 13-04747

Permit Type: Initial Installation

Permit Description: J57 Engine #1 a component of the PSL Building 124 J57 Heating system that was manufactured between 1955 and 1960 -- P026.

Facility ID: 1318001169

Facility Location: NASA John H. Glenn Research Center - Lewis Field
21000 Brookpark Road,
Cleveland, OH 44135-3191

Facility Description: Space Research and Technology

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio, has issued a draft action of an air pollution control permit-to-install (PTI) for an air contaminant source at the location identified above on the date indicated. Installation of the air contaminant source may proceed upon final issuance of the PTI. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to David Hearne at Cleveland Division of Air Quality, Penton Media Building, 4th Floor 1300 East 9th Street or (216)664-2297. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 13-04747

Facility ID: 1318001169

Effective Date: To be entered upon final issuance

Facility ID: 13-18-00-1169

Emissions Unit: P026

Permit: 13-04747

[NSR Discussion](#)

Exemptions

Are one or more emissions units exempt from permitting ?

No

Permit by Rule

No

General Permits

No

Process Description

This unit, the PSL J57 (J57 is a jet engine) Heater System is connected to a heating system that provides vitiated heated air to the PSL Test Cells.

BAT

Was a BAT analysis needed to determine if add-on controls are cost effective and technically feasible? **N/A**

Was the emissions unit installed after August 3, 2006? **The unit was installed in January of 2007.**

Is the controlled potential to emit less than ten tons per year?

The facility has accepted a voluntary restriction on annual fuel usage. This 800, 000 gallon limitation brings PTE for all pollutants except NOx under 10 tpy.

Control Device Monitoring

N/A: No control device

Air Toxics

N/A

Minor Source Modeling

Do the total project emissions for one or more criteria pollutants exceed the minor source modeling thresholds contained in Engineering Guide 69 Table 3?



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No, the facility will restrict their annual JP-8 jet fuel usage rate to 800,000 gallons

Rules: OAC, NSPS, NESHAP, MACT OAC

3745-21-07(G)(2): not applicable to fuel burning equipment per Central Office; see old 21-07(B); No PRM's in the fuel used for this EU.

3745-21-09: N/A -- this type of stationary source is not subject to this rule.

NSPS: N/A

Subpart KKKK

N/A: This EU was manufactured in 1955-1960, and has not been modified or rebuilt.

NESHAP - N/A: This EU does not emit HAP

MACT - N/A.

HAPs – N/A

Potential to Emit

Was the pound per hour limit established based on the maximum hourly design capacity? **Yes**

Ton/year based on 8760 hours/year? If no, explain. **No, this is a batch operation, TPY based on annual fuel usage of 800,000 gallons.**

Batch operation? **Yes**

PSD attainment pollutants only: CO, NOx, SO2, and lead (Cuyahoga county)

Is this facility one of the 28 source categories with facility PTE greater than 100 tpy? **No**

If not 28 source category, is facility PTE greater than 250 tpy? **Yes**

For this project, is the increase above one or more major modification thresholds? **No**

Was Netting and/or Synthetic Minor needed to avoid PSD? **No, facility is voluntarily restricting fuel usage to 800,000 gallons annually.**

The new J-57 jet engine falls under the definition of "replacement units" according to OAC rule 3745-31-01(GGGGG). The replacement engine and the engine being replaced are identical and are used in the same process. The old unit had never been issued a PTI due to an installation date of 1972, but was issued a PTO. There will be an increase of emissions "on paper", but there will be no actual increase in facility wide emissions. Furthermore there will be a decrease in emissions because this unit will be operating under an annual fuel consumption limit of 800,000 gallons, which is less than the amount of fuel that was originally being burned in this unit. This project will not cause a significant increase of any regulated NSR pollutant and is not considered a "major modification".



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Comparison of Current Actual Baseline Emissions and Future Actual Permitted Emission: (tons/year)

Pollutant	CO	NOx	SO ₂	PM	PM ₁₀	PM _{2.5}	VOC	Lead
Current Baseline Actual Emissions (Old Engine(s)) ('05 & '06 avg.)	0.01	0.03	0	1.42	0.01	0.01	0	N/A
Future Actual Emissions (New Engine(s))	5.54	23.63	2.06	0.6	8.52	8.52	2.57	N/A
Change	5.53 increase	23.6 increase	2.06 increase	0.82 Decrease	8.51 increase	8.51 increase	2.57 increase	N/A
PSD/NNSR Significant Rate	100	40	40	25	15	10	40	0.6
PSD/NNSR Significant Net Emissions Review Required?	No	No	No	No	No	No	No	No
Modeling Significant Emission Rates	100	25	25	N/A	10	NA	N/A	N/A
Modeling Required?	No	No	No	No	No	No	No	No

Nonattainment NSR for ozone and PM2.5 (Cuyahoga county)

Facility PTE greater than 100 tpy for nonattainment pollutant of concern? **Yes**

For this project, is the increase above major modification threshold?

No, the facility opted for a voluntary restriction on annual fuel usage to avoid NNSR and PSD.

Was Netting and/or Synthetic Minor needed to avoid Nonattainment NSR?

Yes, a voluntary limitation of 800,000 gallons of jet fuel annually to keep the facility below PSD and NNSR thresholds.

Ozone: No



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PM2.5: No

Modification

This is not a modification.

Title V

This is a Title-V facility with a facility-wide PTE greater than 100 TPY for CO, NOx, PM, SO2, and VOC. The facility is operating under a synthetic minor (HAP limitation) to avoid major source thresholds.

Synthetic Minor to avoid Title V?

No.

Is this PTI a Significant Modification for a Title V facility?

No.

Stack test required? (for each emissions unit)

Need to determine based on size of emissions unit, required by rule, reliability of data used to establish emission limits, etc.. **NA**

Additional Concerns or Special Circumstances associated with permit

The unit is only run for small amounts of time during a test cycle. On average the unit is run for 15-30 minutes per test cycle (batch)

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

<u>Pollutant</u>	<u>Tons Per Year</u>
NOx	23.63
SO2	20.8
PM₁₀/PM_{2.5}	8.52
CO	5.54
VOC	2.57

*Note: The permittee has proposed that the amount of emissions increase, which is the difference between the future projected actual emissions and the current actual emissions, as a result of this J - 57 turbine jet engine replacement project will be less than 40 tons NOx/year,



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less than 40 tons SO₂/year, less than 15 tons PM₁₀/year, less than 10 tons PM_{2.5}/year, less than 100 tons CO/year, and less than 40 tons VOC/year. In accordance with OAC rule 3745-31-10(A)(3), the permittee will have to maintain records for the next 10 years that demonstrate that the amount of actual emissions increase stays below these major modification thresholds.



**State of Ohio Environmental Protection Agency
Division of Air Pollution Control**

DRAFT

Air Pollution Permit-to-Install
for
NASA John H. Glenn Research Center - Lewis Field

Facility ID: 1318001169
Permit Number: 13-04747
Permit Type: Initial Installation
Issued: 9/23/2008
Effective: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install
for
NASA John H. Glenn Research Center - Lewis Field

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Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 13-04747

Facility ID: 1318001169

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1318001169

Facility Description: Research and development center.

Application Number(s): A0008755

Permit Number: 13-04747

Permit Description: J57 Engine #1 a component of the PSL Building 124 J57 Heating system that was manufactured between 1955 and 1960 -- P026.

Permit Type: Initial Installation

Permit Fee: \$1,000.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 9/23/2008

Effective Date: To be entered upon final issuance

This document constitutes issuance to:

NASA John H. Glenn Research Center - Lewis Field
21000 Brookpark Road
Cleveland, OH 44135-3191

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Cleveland Division of Air Quality
Penton Media Building, 4th Floor
1300 East 9th Street
Cleveland, OH 44114
(216)664-2297

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section 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 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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 13-04747

Facility ID: 1318001169

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: 13-04747

Permit Description: J57 Engine #1 a component of the PSL Building 124 J57 Heating system that was manufactured between 1955 and 1960 -- P026.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	P026
Company Equipment ID:	PSL 124 preheater - P026
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 13-04747

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A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A. 2.a), Severability Clause
 - (2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A. 9., Reporting Requirements
 - (5) Standard Term and Condition A. 10., Applicability
 - (6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A. 14., Public Disclosure
 - (8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A. 16., Fees
 - (10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. 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 re-issuance, or modification.
- 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, 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 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.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) 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, 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.
- 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:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Cleveland Division of Air Quality.
 - (2) 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 made to the Cleveland Division of Air Quality. The written 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. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Cleveland Division of Air Quality every six months, by January 31 and July 31 of each year for the previous six calendar months. 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.

(4) This permit is for an emissions unit located at a Title V facility. 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.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

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, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Cleveland Division of Air Quality 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 shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

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

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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.

c) 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:

(1) 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.



- (2) 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 ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) 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.
- d) The permittee shall submit progress reports to the Cleveland Division of Air Quality 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:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) 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.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Cleveland Division of Air Quality.
- 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 state-only required 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 Cleveland Division of Air Quality. 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.)



10. Applicability

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.



- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 13-04747

Facility ID: 1318001169

Effective Date: To be entered upon final issuance

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Cleveland Division of Air Quality must be notified in writing of any transfer of this permit.

18. 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.

19. 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 13-04747

Facility ID: 1318001169

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B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install

Permit Number: 13-04747

Facility ID: 1318001169

Effective Date: To be entered upon final issuance

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) None.



State of Ohio Environmental Protection Agency
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C. Emissions Unit Terms and Conditions



1. P026, PSL 124 preheater

Operations, Property and/or Equipment Description:

PSL 124 preheater - P026

a) 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.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	NO _x emissions shall not exceed 118.2 lbs/hr; SO ₂ emissions shall not exceed 104 lbs/hr; See (2)a.
b.	OAC rule 3745-31-05(D)(1)	See (2)b. and (2)c.
c.	OAC rule 3745-17-07 (A)	Visible PE from any stack shall not exceed twenty per cent opacity, as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)(4)	Particulate emissions (PE) from the turbine's exhaust shall not exceed 0.040 lb/mmBtu of actual heat input
e.	OAC rule 3745-18-06(F)	SO ₂ emissions shall not exceed 0.5 lb/mmBtu actual heat input
f.	OAC rule 3745-31-10(A)(1) "Future Projected Actual" emissions	See (2)d.

(2) Additional Terms and Conditions

a. The hourly emission limit was established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with this short term emissions limitation.

b. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM, VOC, and CO emissions from this air contaminant source since the calculated annual emissions rates for these pollutants are less than 10 tpy taking into account the federally enforceable limits under OAC rule 3745-31-05(D) and the following voluntary restriction:

i. Annual jet fuel usage shall not exceed 800,000 gallons

The permittee has proposed a federally enforceable voluntary restriction on the annual jet fuel usage to ensure that future projected actual emissions will not cause an increase above the major modification thresholds.

c. The total, combined mass emissions from this emissions unit as a 12-month rolling summation, shall not exceed the following:

- NOx 23.63 tpy;
- SO₂ 20.8 tpy;
- PM 8.52 tpy (includes both PM₁₀ and PM_{2.5});
- CO 5.54 tpy; and
- VOC 2.57 tpy.

d. The permittee has proposed that the amount of emissions increase, which is the difference between the future projected actual emissions and current actual emissions, as a result of this project will be less than 100 tons CO/year, 40 tons NOx/year, 40 tons SO₂/year, 15 tons PM₁₀/year, 10 tons PM_{2.5}/year, and 40 tons VOC/year. In accordance with OAC rule 3745-31-10(A)(3), the permittee will have to maintain records for the next 10 years that demonstrate that the amount of actual emissions increase stays below these major modification thresholds.

c) Operational Restrictions

1. The permittee shall burn only commercially available naphtha and distillate-based jet fuels (i.e., no experimental jet fuels) in this emissions unit.
2. The amount of commercially available naphtha and distillate-based jet fuel burned in this emissions unit shall not exceed 800,000 gallons per year based upon a rolling 12-month summation of the monthly gallon usage amounts.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the annual jet fuel consumption specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Fuel Consumption Rate</u> <u>(gallons)</u>
1	66,674
1-2	133,340
1-3	200,006

1-4	266,672
1-5	333,338
1-6	400,004
1-7	466,670
1-8	533,336
1-9	600,002
1-10	666,668
1-11	733,334
1-12	800,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emission limitation for fuel usage shall be based upon a rolling, 12 month summation of the monthly emissions.

d) Monitoring and/or Recordkeeping Requirements

1. The permittee shall record and maintain monthly records of the name and/or identification number of each fuel used.
2. The permittee shall maintain monthly records of the following information:
 - a. the amount of fuel consumed for each month; and
 - b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the fuel consumed.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative amount of fuel consumption for each calendar month.

3. In accordance with OAC rule 3745-31-10(A)(3), the permittee shall maintain annual records for ten (10) years after the issuance of this permit of the following:
 - a. the number of gallons of jet fuel consumed;
 - b. the total annual NO_x, VOC, CO, PM₁₀, and PM_{2.5} (using factor for PM₁₀) emissions for this emissions unit, as calculated by multiplying the emissions factors from the IERA-RS-BR-SR-2001-0010 titled AAUNITED STATES AIR FORCE IERA Air Emissions Inventory Guidance Document for Mobile Sources at Air Force Installations by the annual gallons of jet fuel consumed; and
 - c. the total annual SO₂ emissions for this emissions unit as calculated by multiplying the emissions factors from AP-42 for Distillate Oil Fired Stationary Gas Turbine factors (Table 3.1-2a Emission Factors for Criteria Pollutants and Greenhouse Gases from Stationary Gas Turbines) by the annual gallons of jet fuel consumed.

e) Reporting Requirements

1. The permittee shall submit deviation (excursion) reports to the Cleveland Division of Air Quality (CDAQ) that identify each day when a fuel other than commercially available

naphtha and distillate-based jet fuel was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

2. The permittee shall submit quarterly deviation (excursion) reports to the CDAQ which identify all exceedances of the rolling, 12-month limitation on the amount of fuel consumption; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative amount of fuel consumption. These reports shall be submitted in accordance with the reporting requirements specified in the Standard Terms and Conditions of this permit.
3. In accordance with OAC rule 3745-31-10(A)(5), the permittee shall submit a deviation report to the CDAQ if the actual annual emissions, in tons/year, exceed the baseline actual emissions by a significant amount for CO, NO_x, PM₁₀, PM_{2.5}, SO₂, and VOC, as noted in b)(2)c and b)(2)d. above and if such emissions differ from the preconstruction projection as documented and maintained pursuant to OAC rule 3745-31-10(A)(1)(c). Such report shall be submitted within 60 days after the end of such year. This condition will remain in effect for ten years after the issuance date of this permit.

f) Testing Requirements

1. Compliance with the emission limitation(s) in b)(1) and b)(2) of these terms and conditions shall be determined in accordance with the following methods:

a. **Emission Limitation**

NO_x emissions from this unit shall not exceed 118.2 lbs/hr.

Applicable Compliance Method

The short term emissions limitation was determined by multiplying the worst case scenario emissions factor for NO_x (59.0824 lbs/1000 gallons of fuel burned) by the maximum fuel consumption rate of the unit (2000 gallons/hour).

Emissions factor for Nitrogen Oxides - 59.0824 lbs/1000 gallons, taken from IERA-RS-BR-SR-2001-0010 titled AAUNITED STATES AIR FORCE IERA Air Emissions Inventory Guidance Document for Mobile Sources at Air Force Installations.

b. **Emission Limitation**

SO₂ emissions from this unit shall not exceed 104 lbs/hr.

Applicable Compliance Method

The short term emissions limitation was determined by multiplying the worst case scenario emissions factor for SO₂ (52 lbs/1000 gallons of fuel burned) by the maximum fuel consumption rate of the unit (2000 gallons/hour).

Emissions factor for SO₂ - 52 lbs/1000 gallons, taken from AP-42 for Distillate Oil Fired Stationary Gas Turbine factors (Table 3.1-2a Emission Factors for Criteria Pollutants and Greenhouse Gases from Stationary Gas Turbines). This factor was converted from the AP-42 for the worst case fuel with a sulfur content of 0.4%, heat content of 18,400 Btu/lb, and density of 7 lbs/gal. The AP-42 factor is 1.01(S) lb SO₂/mmBtu where S is the sulfur content of the fuel. Using 0.4 for the sulfur content gives an emission factor of 0.404 lb SO₂/mmBtu.

This factor is converted as follows:

$$0.404 \text{ lb SO}_2/\text{mmBtu} \times 0.0184 \text{ mmBtu/lb} \times 7 \text{ lbs/gal} \times 1000 \text{ gal/1000 gal} = 52 \text{ lbs SO}_2/1000 \text{ gal.}$$

c. **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

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

d. **Emission Limitation**

Particulate emissions from this unit shall not exceed 0.040 lb/mmBtu.

Applicable Compliance Method

The short term emissions limitation was determined by dividing the worst case scenario emissions factor for PM (21.29 lbs/1000 gallons of fuel burned) by the heat content of the fuel (125,000 mmBtu/gallon).

Emission factor for PM: See Miscellaneous Requirements: g)(1)a.

e. **Emission Limitation**

Sulfur dioxide emissions shall not exceed 0.5 lbs/mmBtu actual heat input.

Applicable Compliance Method

The short term emissions limitation was determined by dividing the worst case scenario emissions factor for SO₂ (52 lbs/1000 gallons of fuel burned) by the heat content of the fuel (125,000 mmBtu/gallon).

f. **Emission limitation**

NO_x emissions shall not exceed 23.63 tpy

Applicable Compliance Method

Compliance shall be determined by the record keeping and reporting requirements in sections d) and e).

Compliance with the annual allowable NO_x emission rate shall be determined by multiplying the NO_x emission factor (lbs /1000 gal) times the fuel usage for each month (gallons/month) summed over the most recent 12 - month period times (1 ton/2000 lbs)

g. **Emission Limitation**

SO₂ emissions shall not exceed 20.8 tpy based upon a rolling 12 - month summation

Applicable Compliance Method

Compliance shall be determined by the record keeping and reporting requirements in sections d) and e).

Compliance with the allowable SO₂ emission rate shall be determined by multiplying the SO₂ emission factor (lbs/1000 gallon) times the fuel usage for each month (gallons/month) summed over the most recent 12 - month period times (1 ton/2000 lbs).

Emissions factor for Sulfur Dioxide - 52 lbs/1000 gallons, taken from AP-42 for Distillate Oil Fired Stationary Gas Turbine factors (Table 3.1-2a Emission Factors for Criteria Pollutants and Greenhouse Gases from Stationary Gas Turbines).

h. **Emission Limitation**

PM emissions shall not exceed 8.52 tpy based upon a rolling 12 - month summation

Applicable Compliance Method

Compliance shall be determined by the record keeping and reporting requirements in sections d) and e).

Compliance with the allowable PM rate shall be determined by multiplying the PM emission factor (lbs/1000 gallon) times the fuel usage for each month (gallons/month) summed over the most recent 12 - month period times (1 ton/2000 lbs).

Emissions factor for PM: See Miscellaneous Requirements: g)(1)a.

i. **Emission Limitation**

CO emissions shall not exceed 5.54 tpy based upon a rolling 12 - month summation

Applicable Compliance Method

Compliance shall be determined by the record keeping and reporting requirements in sections d) and e).

Compliance with the allowable CO emission rate shall be determined by multiplying the CO emission factor (lbs/1000 gallon) times the fuel usage for each month (gallons/month) summed over the most recent 12 - month period times (1 ton/2000 lbs).

Emissions factor for CO: See Miscellaneous Requirements g)(1)b.

j. **Emission Limitation**

VOC emissions shall not exceed 2.57 tpy based upon a rolling 12 - month summation

Applicable Compliance Method

Compliance shall be determined by the record keeping and reporting requirements in sections d) and e).

Compliance with the allowable VOC emission rate shall be determined by multiplying the VOC emission factor (lbs/1000 gallon) times the fuel usage for each month (gallons/month) summed over the most recent 12 - month period times (1 ton/2000 lbs).

Emissions factor for VOC: See Miscellaneous Requirements g)(1)c.

g) Miscellaneous Requirements

(1) Calculations and Emissions Factors

IERA-RS-BR-SR-2001-0010 titled AAUNITED STATES AIR FORCE IERA Air Emission Inventory Guidance Document for Mobile Sources at Air Force Installations

a. PM (PM₁₀/PM_{2.5}): 21.29 lbs/1000 gallons
 $(21.29 \text{ lbs/1000 gal})(800,000 \text{ gal/yr})(1 \text{ ton/2000 lbs}) = \mathbf{8.52 \text{ tpy}}$

PM represents PM₁₀/PM_{2.5} combined emissions.

b. Carbon Monoxide: 13.5876 lbs/1000 gallons
 $(13.8576 \text{ lbs/gal})(800,000 \text{ gal/yr})(1 \text{ ton/2000 lbs}) = \mathbf{5.54 \text{ tpy}}$

c. Volatile Organic Compounds: 6.422 lbs/1000 gallons
 $(6.42 \text{ lbs/1000 gal})(800,000 \text{ gal/yr})(1 \text{ ton/2000 lbs}) = \mathbf{2.57 \text{ tpy}}$