

Synthetic Minor Determination and/or **Netting Determination**

Permit To Install **01-08798**

A. Source Description

Denison Hydraulics, Inc (Denison), located in Marysville, Ohio, is a facility that manufactures and coats hydraulic pumps. Denison received a final Title V for the facility on February 29, 2000. A renewal application was submitted on September 20, 2004. Denison request a modification to increase the allowable hours of operation from 800 combined hours to 4,000 combined hours for two diesel test engines.

B. Facility Emissions and Attainment Status

Denison is located in Union County which is considered attainment for all pollutants. Denison's potential to emit for trichloroethylene is greater than ten tons per year and is therefore considered a Title V source. Denison has discontinued use of trichloroethylene and is in the process of withdrawing from the Title V program. This permit is being written with synthetic federally enforceable restrictions on NOx to avoid triggering Title V. Denison has requested to voluntarily restrict emission of CO, Particulate, SO2, and VOC.

C. Source Emissions

This permit will have federally enforceable emission limitations of 30.88 tons of NOx, 6.6 tons of CO, 2.18 tons of PE, 2.04 tons of SO2, and 2.46 tons of VOC per rolling, 12-month period for B008 and B009 combined. In order ensure compliance, Denison has requested federally enforceable restrictions on the number of hours that the two diesel engines can be operated (4,000 hours). Record keeping requirements for hours of operation shall demonstrate compliance with the rolling, 12-month limits contained in the permit.

D. Conclusion

Denison has requested this permit modification for two existing diesel engines to be issued as a synthetic minor with federally enforceable restrictions on NOx, CO, PE, SO2, and VOC. Compliance with the limitations will be ensured by the operational usage restrictions on the number of hours of operation. With the synthetic limitations, Title V thresholds will not be triggered.



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION
UNION COUNTY
Application No: 01-08798
Fac ID: 0180010110**

CERTIFIED MAIL

DATE: 4/28/2005

Denison Hydraulics
Ron Rice
14249 Industrial Parkway
Marysville, OH 43040

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **\$ 200** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

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

CC: USEPA

CDO

UNION COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 01-08798 FOR AN AIR CONTAMINANT SOURCE FOR
Denison Hydraulics**

On 4/28/2005 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Denison Hydraulics**, located at **14249 Industrial Parkway, Marysville, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-08798:

Diesel engine test stands.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417
[(614)728-3778]



**Permit To Install
Terms and Conditions**

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

DRAFT MODIFICATION OF PERMIT TO INSTALL 01-08798

Application Number: 01-08798
Facility ID: 0180010110
Permit Fee: **To be entered upon final issuance**
Name of Facility: Denison Hydraulics
Person to Contact: Ron Rice
Address: 14249 Industrial Parkway
Marysville, OH 43040

Location of proposed air contaminant source(s) [emissions unit(s)]:
**14249 Industrial Parkway
Marysville, Ohio**

Description of proposed emissions unit(s):
Diesel engine test stands.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification 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 source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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

3. Records Retention Requirements

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

4. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any

information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Permit Transfers

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

7. Air Pollution Nuisance

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

8. 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)

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

Denison Hydraulics

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Issued: To be entered upon final issuance

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.

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

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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.

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Denisc

PTI A

Emissions Unit ID: **B008**

Issued: To be entered upon final issuance

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>
CO	6.6
NOx	30.88
PE	2.18
SO2	2.04
VOC	2.46

Denisc

PTI A

Emissions Unit ID: **B008**

Issued: To be entered upon final issuance

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
B008 - Diesel engine - 3 mmBtu/hr to test hydraulic pumps as needed (modification)	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-11(B)(5)(a)
	OAC rule 3745-23-06(B)
	OAC rule 3745-21-08(B)
	OAC rule 3745-21-07(B)

OAC rule 3745-18-06(D)

Applicable Emissions Limitations/Control Measures	
Carbon monoxide (CO) emissions shall not exceed 2.85 lbs/hr.	2.04 tons of SO ₂ per rolling, 12-month period.
Nitrogen oxide (NO _x) emissions shall not exceed 13.23 lbs/hr.	2.46 tons of VOC per rolling, 12-month period.
Sulfur dioxide (SO ₂) emissions shall not exceed 0.87 lb/hr.	See Section B.1 and 2 below.
Volatile organic compound (VOC) emissions shall not exceed 1.05 lb/hr.	Visible particulate emissions shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
Particulate emissions (PE) shall not exceed 0.31 lb/mmBtu of actual heat input.	PE from the engine's exhaust shall not exceed 0.25 lb/mmBtu actual heat input.
The requirements for this rule also include compliance with the requirements of OAC rule 3745-17-07(A)(1), OAC rule 3745-21-06(B), OAC rule 3745-21-08(B), and OAC rule 3745-31-05(C).	See Section A.2.b. below.
See section A.2.a and b below.	See Section A.2.c below.
Emissions from the stacks of B008 and B009 combined shall not exceed the following limitations:	See Section A.2.d below.
6.60 tons of CO per rolling, 12-month period	Exempt, pursuant to OAC rule 3745-21-07(A)(2)(c) because the emissions unit is located in Union County at a facility that does not have the potential to emit of more than 100 tons of OC per year.
30.88 tons of NO _x per rolling, 12-month period	Exempt, pursuant to OAC rule 3745-18-06(B) because the engine has a rated heat input capacity of less than 10 mmBtu/hr.
2.18 tons of PE per rolling, 12-month period	

Issued: To be entered upon final issuance**2. Additional Terms and Conditions**

- 2.a** The permittee shall be required to burn only No.2 diesel fuel containing less than 0.5% sulfur by weight in this emissions unit.
- 2.b** This limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that the limitation be modified to 0.310 lb PE/mmBtu of actual heat input but the new limitation will not become effective until it is approved by U.S. EPA as a revision to the Ohio SIP for particulate matter.
- 2.c** The design of the emissions unit and technology associated with the current operating practices will satisfy the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06.

On February 15, 2005, OAC rule 3745-23-06 was rescinded and therefore no longer a part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-23-06, the requirement to satisfy "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.d** The design of the emissions unit and technology associated with the current operating practices will satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

- 2.e** The hourly emission limitations for this emissions unit were established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, record keeping, and reporting requirements to ensure compliance with the emission limitation.

B. Operational Restrictions

1. The maximum annual operational hours for emissions units B008 and B009 combined shall not

exceed 4,000 hours per rolling, 12-month period.

2. The permittee has existing records of the hours of operation for emissions units B008 and B009. Therefore, the first year of monthly, accumulated hours of operation limitations are not necessary.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the total hours of operation for this emissions unit;
 - b. the rolling 12-month summation of the hours of operation for emissions units B008 and B009 combined; and
 - c. the rolling, 12-month summation of emissions for emissions units B008 and B009 combined.
2. For each day during which the permittee burns a fuel other than diesel fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. For each shipment of fuel oil received, the permittee shall also maintain records of the permittee's or suppliers' analysis for sulfur content.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day which a fuel other than diesel fuel with a maximum sulfur content 0.5% by weight was burned in this emissions unit.
2. The permittee shall submit quarterly deviation (excursion) reports which identify the following for emissions units B008 and B009:
 - a. any monthly record showing an exceedance of the rolling, 12-month operational hours limitation; and
 - b. any monthly record showing an exceedance of the rolling, 12-month emission limitations.

These quarterly reports shall be submitted to the Ohio EPA, Central District Office in accordance with Part I, Section A.1. of the General Terms and Conditions.

E. Testing Requirements

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PTI A

Emissions Unit ID: **B008**

Issued: To be entered upon final issuance

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

- a. Emission Limitation:
CO emissions shall not exceed 2.85 lbs/hr.

Applicable Compliance Method:

Compliance with the short term limitation may be demonstrated by multiplying the emission factor, 0.95 lb/MMBTU of actual heat input (AP-42, Table 3.3-1, 10/1996), by the maximum heat input, 3 MMBTU/hr.

$$\text{CO} - 0.95 \text{ lb/MMBTU} * 3 \text{ MMBTU/hr} = 2.85 \text{ lbs/hr}$$

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10 for CO. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

- b. Emission Limitation:
NOx emissions shall not exceed 13.23 lbs/hr.

Applicable Compliance Method:

Compliance with the short term limitation may be demonstrated by multiplying the emission factor, 4.41 lbs/MMBTU of actual heat input (AP-42, Table 3.3-1, 10/1996), by the maximum heat input, 3 MMBTU/hr.

$$\text{NOx} - 4.41 \text{ lbs/MMBTU} * 3 \text{ MMBTU/hr} = 13.23 \text{ lbs/hr}$$

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E for NOx. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

- c. Emission Limitation:
PE shall not exceed 0.31 lb/mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the limitation may be demonstrated by the emission factor, 0.31 lb/MMBTU of actual heat input (AP-42, Table 3.3-1, 10/1996).

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PTI A

Emissions Unit ID: **B008**

Issued: To be entered upon final issuance

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 for particulate. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. Emission Limitation:
SO₂ emissions shall not exceed 0.87 lb/hr.

Applicable Compliance Method:

Compliance with the short term limitation may be demonstrated by multiplying the emission factor, 0.29 lb/MMBTU of actual heat input (AP-42, Table 3.3-1, 10/1996), by the maximum heat input, 3 MMBTU/hr.

$$\text{SO}_2 - 0.29 \text{ lb/MMBTU} * 3 \text{ MMBTU/hr} = 0.87 \text{ lb/hr}$$

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 6C for SO₂. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

- e. Emission Limitation:
VOC emissions shall not exceed 1.05 lbs/hr.

Applicable Compliance Method:

Compliance with the short term limitation may be demonstrated by multiplying the emission factor, 0.35 lb/MMBTU of actual heat input (AP-42, Table 3.3-1, 10/1996), by the maximum heat input, 3 MMBTU/hr.

$$\text{VOC} - 0.35 \text{ lb/MMBTU} * 3 \text{ MMBTU/hr} = 1.05 \text{ lbs/hr}$$

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25, or 25A for VOC. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

- f. Emission Limitation:
Visible particulate emissions shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

- g. Emission Limitations:
Emissions from the stacks of B008 and B009 combined shall not exceed the following limitations per rolling, 12-month period:

6.60 tons of CO
30.88 tons of NOx
2.18 tons of PE
2.04 tons of SO2
2.46 tons of VOC

Applicable Compliance Method:

Compliance with the annual emission limitations shall be demonstrated through the record keeping requirements specified in Section C.1.c above.

F. Miscellaneous Requirements

None

Denisc

PTI A

Emissions Unit ID: **B009**

Issued: To be entered upon final issuance

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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
B009 - Diesel engine - 3.5 mmBtu/hr to test hydraulic pumps as needed	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-17-07(A)(1)
	OAC rule 3745-17-11 (B)(5)(a)
	OAC rule 3745-23-06 (B)
	OAC rule 3745-21-08(B)
	OAC rule 3745-21-07(B)

Denisc

PTI A

Emissions Unit ID: **B009**

Issued: To be entered upon final issuance

OAC rule 3745-18-06(D)

<u>Applicable Emissions Limitations/Control Measures</u>	
Carbon monoxide (CO) emissions shall not exceed 3.33 lbs/hr.	2.18 tons of PE per rolling, 12-month period
Nitrogen oxide (NOx) emissions shall not exceed 15.44 lbs/hr.	2.04 tons of SO2 per rolling, 12-month period.
Particulate emissions (PE) shall not exceed 0.31 lb/mmBtu of actual heat input.	2.46 tons of VOC per rolling, 12-month period.
Sulfur dioxide (SO2) emissions shall not exceed 1.02 lb/hr.	See Section B.1 below.
Volatile organic compound (VOC) emissions shall not exceed 1.23 lb/hr.	Visible particulate emissions shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
The requirements for this rule also include compliance with the requirements of OAC rules 3745-17-07 (A)(1), OAC rule 3745-23-06(B), OAC rule 3745-21-08(B), and OAC rule 3745-31-05(C).	PE from the engine's exhaust shall not exceed 0.25 lb/mmBtu of actual heat input.
See Section A.2.a and b below.	See Section A.2.b below.
Emissions from the stacks of B008 and B009 combined shall not exceed the following limitations:	See Section A.2.c below.
6.60 tons of CO per rolling, 12-month period	See Section A.2.d below.
30.88 tons of NOx per rolling, 12-month period	Exempt, pursuant to OAC rule 3745-21-07(A)(2)(c) because the emissions unit is located in Union County at a facility that does not have the potential to emit of more than 100 tons of OC per year.
	Exempt, pursuant to OAC rule 3745-18-06(B) because the engine has a rated heat input capacity of less than 10 mmBtu/hr.

2. Additional Terms and Conditions

2.a The permittee shall be required to burn only No.2 diesel fuel containing less than 0.5% sulfur by weight in this emissions unit.

2.b This limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that the limitation be modified to 0.310 lb PE/mmBtu of actual heat input but the new limitation will not become effective until it is approved by U.S. EPA as a revision to the Ohio SIP for particulate matter.

2.c The design of the emissions unit and technology associated with the current operating practices will satisfy the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06.

On February 15, 2005, OAC rule 3745-23-06 was rescinded and therefore no longer a part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-23-06, the requirement to satisfy "latest available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

2.d The design of the emissions unit and technology associated with the current operating practices will satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

2.e The hourly emission limitations for this emissions unit were established to reflect the potential to emit. Therefore, it is not necessary to develop additional monitoring, record keeping, and reporting requirements to ensure compliance with the emission limitation.

B. Operational Restrictions

1. The maximum annual operational hours for emissions units B008 and B009 combined shall not exceed 4,000 hours per rolling, 12-month period.

Denisc

PTI A

Emissions Unit ID: **B009**

Issued: To be entered upon final issuance

2. The permittee has existing records of the hours of operation for emissions units B008 and B009. Therefore, the first year of monthly, accumulated hours of operation limitations are not necessary

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. the total hours of operation for this emissions unit;
 - b. the rolling 12-month summation of the hours of operation for emissions units B008 and B009 combined; and
 - c. the rolling, 12-month summation of emissions for emissions units B008 and B009 combined.
2. For each day during which the permittee burns a fuel other than diesel fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
3. For each shipment of fuel oil received, the permittee shall also maintain records of the permittee's or suppliers' analysis for sulfur content.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day which a fuel other than diesel fuel with a maximum sulfur content 0.5 per cent by weight was burned in this emissions unit.
2. The permittee shall submit quarterly deviation (excursion) reports which identify the following for emissions units B008 and B009:
 - a. any monthly record showing an exceedance of the rolling, 12-month operational hours limitation; and
 - b. any monthly record showing an exceedance of the rolling, 12-month emission limitations.

These quarterly reports shall be submitted to the Ohio EPA, Central District Office in accordance with Part I, Section A.1. of the General Terms and Conditions.

V. Testing Requirements

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

- a. Emission Limitation:
CO emissions shall not exceed 3.33 lbs/hr

Applicable Compliance Method:

Compliance with the short term limitation may be demonstrated by multiplying the emission factor, 0.95 lb/MMBTU of actual heat input (AP-42, Table 3.3-1, 10/1996), by the maximum heat input, 3.5 MMBTU/hr.

$$\text{CO} - 0.95 \text{ lb/MMBTU} * 3.5 \text{ MMBTU/hr} = 3.33 \text{ lbs/hr}$$

If required, the permittee may demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 10 for CO. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

- b. Emission Limitation:
NOx emissions shall not exceed 15.44 lbs/hr

Applicable Compliance Method:

Compliance with the short term limitation shall be demonstrated by multiplying the emission factor, 4.41 lbs/MMBTU of actual heat input (AP-42, Table 3.3-1, 10/1996), by the maximum heat input, 3.5 MMBTU/hr.

$$\text{NOx} - 4.41 \text{ lbs/MMBTU} * 3.5 \text{ MMBTU/hr} = 15.44 \text{ lbs/hr}$$

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 7E for NOx. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

- c. Emission Limitation:
PE shall not exceed 0.31 lb/mmBtu of actual heat input

Applicable Compliance Method:

Compliance with the limitation may be demonstrated by the emission factor, 0.31 lb/MMBTU of actual heat input (AP-42, Table 3.3-1, 10/1996).

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If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-5 for particulate. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

- d. Emission Limitation:
SO₂ emissions shall not exceed 1.02 lb/hr

Applicable Compliance Method:

Compliance with the short term limitation may be demonstrated by multiplying the emission factor, 0.29 lb/MMBTU of actual heat input (AP-42, Table 3.3-1, 10/1996), by the maximum heat input, 3.5 MMBTU/hr.

$$\text{SO}_2 - 0.29 \text{ lb/MMBTU} * 3.5 \text{ MMBTU/hr} = 1.02 \text{ lb/hr}$$

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and Method 6C for SO₂. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

- e. Emission Limitation:
VOC emissions shall not exceed 1.23 lbs/hr

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PTI A

Issued: To be entered upon final issuance

Emissions Unit ID: **B009**

Applicable Compliance Method:

Compliance with the short term limitation may be demonstrated by multiplying the emission factor, 0.35 lb/MMBTU of actual heat input (AP-42, Table 3.3-1, 10/1996), by the maximum heat input, 3.5 MMBTU/hr.

$$\text{VOC} - 0.35 \text{ lb/MMBTU} * 3.5 \text{ MMBTU/hr} = 1.23 \text{ lbs/hr}$$

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1-4 and 18, 25, or 25A for VOC. Alternative EPA approved test methods may be used with prior approval from the Ohio EPA.

- f. **Emission Limitation:**
Visible particulate emissions shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method:

Compliance with the visible particulate limitation shall be demonstrated by the methods outlined in 40 CFR Part 60, Appendix A, Method 9.

- g. **Emission Limitations:**
Emissions from the stacks of B008 and B009 combined shall not exceed the following limitations per rolling, 12-month period:

6.60 tons of CO
30.88 tons of NOx
2.18 tons of PE
2.04 tons of SO2
2.46 tons of VOC

Applicable Compliance Method:

Compliance with the annual emission limitations shall be demonstrated through the record keeping requirements specified in Section C.1.c above.

F. Miscellaneous Requirements

None