

## **SYNTHETIC MINOR DETERMINATION**

A) SOURCE DESCRIPTION:

Maria Gardens Greenhouses has requested a modification in the Permit to Operate (PTO) for the 7.82 mmBtu/hour coal fired stoker boiler at its facility at 4874 Detroit Road, Elyria, Ohio. The modification would result in a federally enforceable State operating permit sulfur dioxide emissions limit for this source (B004) of 99.44 tons/year. SO<sub>2</sub> emissions for the facility would be limited to 99.50 TPY.

B) FACILITY EMISSIONS AND AREA ATTAINMENT STATUS:

Elyria is in the central portion of Lorain County which is designated attainment for SO<sub>2</sub>. Current actual annual SO<sub>2</sub> emissions for this source are estimated to be 15.34 tons. Actual annual SO<sub>2</sub> emissions from this facility (including SO<sub>2</sub> potential to emit of .06 tons from 3 natural gas fired boilers) are estimated to be 15.40 tons.

C) MODIFIED SOURCE EMISSIONS LIMITATIONS:

Through the "Additional Federally Enforceable Emissions Requirements for Sulfur Dioxide" section of this PTO, this facility will be limited to annual SO<sub>2</sub> emissions of 99.50 TPY. This specific source (B004) will be restricted to annual SO<sub>2</sub> emissions of 99.44 TPY to be achieved by:

- 1) Limiting the sulfur content of the coal purchased and burned in this 7.82 mmBtu/hour boiler to 4.36 pounds of SO<sub>2</sub> per million Btu heat input on a "dry" basis. (This value shall be determined by a weighted monthly average of supplier analyses of coal shipments during each month.)
- 2) Limiting the number of hours and/or days of source operation to 5832 and/or 243 respectively on a rolling 365 day cumulative total basis
- 3) Requiring this facility to record monthly coal quality data and operational hours/days and to report this data on a quarterly basis to NEDO.

D) CONCLUSIONS:

NEDO believes that the coal quality and boiler operating time restrictions placed on this relatively small source will effectively limit this facility to "synthetic minor" status with regards to SO<sub>2</sub> emissions. The facility is a minor source for other air pollutants.