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**PERMIT TO INSTALL HAMILTON COUNTY
APPLICATION NO 14-2635**

06/03/93

OEPA/DOE

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LETTER



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

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George V. Voinovich
Governor

Donald R. Schregardus
Director

Re: Permit to Install
Hamilton County
Application No: 14-2635
NSPS
SYNTHETIC MINOR

CERTIFIED MAIL

June 3, 1993

US DEPT OF ENERGY-FERNALD ENV MGMT PRJCT
BEHRAM SHROFF
7400 WILLEY RD
FERNALD, OH 45239

You are hereby notified that the Ohio Environmental Protection Agency has made a preliminary staff determination recommending that the Director issue a Permit to Install for the source(s) shown on the enclosed draft permit. This preliminary determination is not an authorization to begin construction or modification of your source(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 source(s) 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 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 may be issued in proposed or final form based on the preliminary determination, 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 a fee of \$293 will be due. Please do not submit any payment now.

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

Very truly yours,

Thomas G. Rigo, Manager
Field Operations & Permit Section
Division of Air Pollution Control

cc: US EPA
CINCINNATI AIR POLLUTION, DAPC
Ohio-Kentucky-Indiana Regional Council of Govts.
Kentucky Dept of Natural Resources & Env. Protection

Permit to Install Terms and Conditions

Application No. 14-2635
APS Premise No. 1431110128
Permit Fee:

Name of Facility: US DEPT OF ENERGY-FERNALD ENV MGMT PRJCT

Person to Contact: BEHRAM SHROFF

Address: 7400 WILLEY RD
FERNALD, OH 45239

Location of proposed source(s): 7400 WILLEY RD
FERNAND, OHIO

Description of proposed source(s):
100 MMBTU/HR GAS FIRED BOILER.

Date of Issuance:

Effective Date:

The above named entity is hereby granted a permit to install for the above described source(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described 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 and specifications, the above described source(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

Director

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TERMINATION OF PERMIT TO INSTALL

Substantial construction for installation must take place within 18 months of the effective date of this permit. 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.

NOTICE OF INSPECTION

The Director of the Ohio Environmental Protection Agency, or his authorized representatives, may enter upon the premises of the above-named applicant during construction and operation at any reasonable time for the purpose of making inspections, conducting tests, or to examine records or reports pertaining to the construction, modification or installation of the source(s) of environmental pollutants identified within this permit.

CONSTRUCTION OF NEW SOURCE(S)

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

If the construction of the proposed source(s) has already begun or has been completed prior to the date the Director of the Ohio 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 Ohio Administrative Code (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 prove to be inadequate or cannot meet applicable standards.

PERMIT TO INSTALL FEE

In accordance with Ohio Revised Code 3745.11, the specified Permit to Install fee must be remitted within 15 days of the effective date of this permit to install.

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.

APPLICABILITY

This Permit to Install is applicable only to the contaminant sources identified. Separate application must be made to the Director for the installation or modification of any other contaminant sources.

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.

PERMIT TO OPERATE APPLICATION

A Permit to Operate application and a \$15 application fee must be submitted to the appropriate field office for each air contaminant source in this Permit to Install. In accordance with OAC Rule 3745-35-02, the application shall be made at least 90 days prior to start-up of the source.

AIR EMISSION SUMMARY

The air contaminant sources listed below comprise the Permit to Install for US DEPT OF ENERGY-FERNALD ENV MGMT PRJCT located in Hamilton County. The sources listed below shall not exceed the emission limits/control requirements contained in the table. This condition in no way limits the applicability of any other state or federal regulations. Additionally, this condition does not limit the applicability of additional special terms and conditions of this permit.

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<u>Ohio EPA Source Number</u>	<u>Source Identification/Description</u>	<u>BAT Determination</u>	<u>Applicable Federal and OAC Rules</u>	<u>Permit Allowable Mass Emissions and/or Control & Usage Requirements</u>
B006	100 MMBTU/hr Natural Gas Fired Boiler	Use of Low NOx Burners and Natural Gas	3745-31-05 3745-15-07 3745-17-07 3745-17-10 3745-18-06 40 CFR Part 60 Subpart Dc	.005 lb/MMBTU PM .0006 lb/MMBTU SO ₂ .10 lb/MMBTU NO _x .034 lb/MMBTU CO _x .003 lb/MMBTU VOC

SUMMARY
 TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons/Year</u>
PM	1.90
PM ₁₀	1.5
SO ₂	.23
NO _x	39.85
CO _x	13.28
VOC	1.06

NSPS REQUIREMENTS

The following sources are subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

<u>Source No.</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
B006	100 MMBTU/hr Gas Fired Boiler	Dc

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to the NSPS, the source owner/operator is hereby advised of the requirement to report the following at the appropriate times:

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1. Construction date (no later than 30 days after such date);
2. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
3. Actual start-up date (within 15 days after such date); and
4. Date of performance testing (at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
Permit Management Unit
P.O. Box 1049
Columbus, OH 43266-0149

and

Dept. of Environmental Services
Air Quality Program
1632 Central Parkway
Cincinnati, OH 45210

RECORD(S) RETENTION AND AVAILABILITY

All records required by this Permit to Install shall be retained on file for a period of not less than two years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any authorized representative of the Director, for review during normal business hours.

REPORTING REQUIREMENTS

Unless otherwise specified, reports required by the Permit to Install need only be submitted to SW Ohio Air Pollution Control Agency 1632 Central Parkway, Cincinnati, Ohio 45210.

WASTE DISPOSAL

The owner/operator shall comply with any applicable state and federal requirements governing the storage, treatment, transport and disposal of any waste material generated by the operation of the sources.

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MAINTENANCE OF EQUIPMENT

This source and its associated air pollution control system(s) shall be maintained regularly in accordance with good engineering practices and the recommendations of the respective manufacturers in order to minimize air contaminant emissions.

MALFUNCTION/ABATEMENT

In accordance with OAC Rule 3745-15-06, any malfunction of the source(s) or associated air pollution control system(s) shall be reported immediately to the SW Ohio Air Pollution Control Agency, 1632 Central Parkway, Cincinnati, Ohio 45210.

Except as provided by OAC Rule 3745-15-06(A)(3), scheduled maintenance of air pollution control equipment that requires the shutdown or bypassing of air pollution control system(s) must be accompanied by the shutdown of the associated air pollution sources.

AIR POLLUTION NUISANCES PROHIBITED

The air contaminant source(s) identified in this permit may not cause a public nuisance in violation of OAC Rule 3745-15-07.

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ADDITIONAL SPECIAL TERMS AND CONDITIONS

1. Source B006 shall utilize only natural gas as fuel.
2. Source B006 shall not be operated when Sources B001 and B003 are operating concurrently.
3. The natural gas usage in B006 shall not exceed 759 million cubic feet per year based on a 365-day rolling average.
4. In order to ensure Federal enforceability for the first 12-calendar months of operation, the U.S. Dept. of Energy - FEMP shall not exceed the following usage limits for the specific time period:

<u>Month</u>	<u>Total Allowable Usage (million cubic feet)</u>
1-6	379.5
1-7	442.8
1-8	506
1-9	569.3
1-10	631.8
1-11	695
1-12	759

5. U.S. Dept. of Energy - FEMP shall maintain daily records of the amount of natural gas used and the calculated rolling 365-day total.

This facility shall submit quarterly reports to the Ohio EPA field office which summarize on a monthly basis the amount of natural gas used and the calculated 365-day rolling average.

These reports shall be submitted by February 15, May 15, August 15 and November 15 of each year and shall cover the previous 3 calendar months (October through December, January through March, April through June and July through September, respectively).

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Synthetic Minor Determination

U.S. Dept. of Energy - FEMP
PTI 14-2635

A. Source Description:

The U.S. Dept. of Energy - FEMP proposes to install a 100 MMBTU/Hour gas fired boiler (B006).

B. Facility Emissions and Attainment Status:

The U.S. Dept. of Energy - FEMP is a major stationary source located in Hamilton County. This location is non-attainment for VOC and attainment for other criteria pollutants.

C. New Source Emissions:

In order to ensure that PSD is not triggered, emissions from this source must not exceed 40 TPY of NO_x. The facility will operate this boiler on natural gas only using low-NO_x burners. The terms and conditions of the PTI will limit natural gas_x usage to 759 million cubic feet per year based on a 365-day rolling average. The facility shall maintain daily records of the amount of natural gas used and the calculated rolling 365-day total. Quarterly reports will be required to assure compliance.

D. Conclusions:

Limiting B006 to natural gas usage of 759 million cubic feet per year will result in NO_x emissions of 39.85 TPY which is less than the 40 TPY limit.