



12/10/2025

Michael Montfort
Bistrozzi LLC
1700 K Street, N.W., Fifth Floor
Washington, DC 20006-3817

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0302022054
Permit Number: P0138965
Permit Type: Initial Installation
County: Allen

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 facility has been issued for the emissions unit(s) listed in the Authority. 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 Environmental Protection Agency (Ohio EPA) *Weekly Review and Public Notices* website. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search webpage: *eDocument Search*. 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:

Andrea Moore
Permitting Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Rd.
Bowling Green, OH 43402

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published on the Ohio EPA *Weekly Review and Public Notices* website. 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 Ohio EPA DAPC, Northwest District Office at (419)352-8461.

Sincerely,

Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 - Via E-Mail Notification
Ohio EPA-NWDO; Indiana

No	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: *Weekly Review and Public Notices | Ohio Environmental Protection Agency* or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: HClerk@epa.ohio.gov

Draft Air Pollution Permit-to-Install Initial Installation

Bistrozzi LLC
N Cole Rd. and W Bluelick Rd.
Lima, OH 45801

ID#: P0138965

Date of Action: 12/10/2025

Permit Desc: Installation of a data center with 114 diesel-fired emergency generators (2,750 ekW)

The permit and complete instructions for requesting information or submitting comments may be obtained at: <https://epa.ohio.gov/help-center/edocument-search/edocument-search> by entering the permit # or by contacting: Alyse Wineland, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Rd., Bowling Green, OH 43402. Ph: (419)352-8461

Permit Strategy Write-Up

1. Check all that apply:

- Synthetic Minor Determination
- Netting Determination

2. Source Description:

Bistrozzi LLC is requesting an initial permit for 115 new stationary emergency generators (emissions units P001 through P115) for a proposed data center in Lima, Ohio. The emergency generators will burn ultra-low sulfur diesel (ULSD) or renewable diesel fuel such as Hydrotreated Vegetable Oils (HVO).

In addition to the 115 permitted emergency generators, Bistrozzi plans to install and operate cooling towers, diesel fuel storage tanks and small emergency pumps and generators. Bistrozzi has requested that the cooling towers be permitted with state-only enforceable requirements while the remaining units have been determined to be permit exempt.

3. Facility Emissions and Attainment Status:

Bistrozzi will be located in Allen County which is in attainment for all NAAQS.

The unrestricted potential-to-emit (PTE) for the facility is provided below in Table 1. Consistent with U.S. EPA guidance, the potential-to-emit for the emergency generators was calculated assuming each engine operates 500 hours per year.

Table 1 Unrestricted PTE

Pollutant	Unrestricted Emissions (TPY)
NO _x	2,177
CO	507.14
VOC	110.73
PM ₁₀ /PM _{2.5}	52.52
SO ₂	1.51
Total HAP	1.17

Bistrozzi is considered a major source for Title V purposes but is a true minor source for Hazardous Air Pollutants. The facility is requesting federally enforceable limitations for NO_x and CO to avoid major source status under New Source Review (NSR) which requires a Prevention of Significant Deterioration (PSD) permit.

4. Source Emissions:

The 115 emergency generators will be limited to 235.62 tons NO_x and 96.06 tons of CO per rolling, 12-month period by restricting the hours of operation. The appropriate operational, monitoring, recordkeeping, reporting, and testing requirements have been established in order to demonstrate the applicable NSR thresholds are not exceeded.

5. Conclusion:



Permit Number: P0138965
Facility Name: Bistrozzi LLC
Facility ID: 0302022054
Working Copy of a Permit in Progress

The federally enforceable restrictions in this permit are sufficient to limit the NOx and CO emissions to below the major source threshold for NSR.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
NOx	235.62
CO	96.06
PM10	3.85
PM2.5	1.44



**Environmental
Protection
Agency**

DRAFT

Division of Air Pollution Control
Permit-to-Install
for
Bistrozzi LLC

Facility ID: 0302022054
Permit Number: P0138965
Permit Type: Initial Installation
Issued: 12/10/2025
Effective: To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install
for
Bistrozzi LLC

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Authorization

Facility ID: 0302022054
Facility Description: Facility
Application Number(s): A0080713, A0080278
Permit Number: P0138965
Permit Type: Permit-To-Install
Permit Fee: \$71,644.00 *DO NOT send payment at this time, subject to change before final issuance*
Issue Date: 12/10/2025
Effective Date: To be entered upon final issuance

This document constitutes issuance of a Permit-to-Install for the emissions unit(s) identified on the following page to:

Bistrozzi LLC
N Cole Rd. and W Bluelick Rd.
Lima, OH 45801

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Rd.
Bowling Green, OH 43402
(419)352-8461

The above-named entity is hereby granted this Permit-to-Install for the air contaminant source(s) (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 described emissions unit(s) 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

John Logue
Director

Authorization (continued)

Permit Number:P0138965

Permit Description:Installation of a data center with 114 diesel-fired emergency generators (2,750 ekW)

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

Emissions Unit ID:	P115
Company Equipment ID:	HUBGEN
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name:Cooling Towers

Emissions Unit ID:	P120
Company Equipment ID:	TWR 1-1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P121
Company Equipment ID:	TWR 1-2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P122
Company Equipment ID:	TWR 1-3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P123
Company Equipment ID:	TWR 1-4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P124
Company Equipment ID:	TWR 1-5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P125
Company Equipment ID:	TWR 1-6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P126
Company Equipment ID:	TWR 1-7
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P127
Company Equipment ID:	TWR 1-8
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Effective Date: To be entered upon final issuance

Emissions Unit ID:	P128
Company Equipment ID:	TWR 1-9
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P129
Company Equipment ID:	TWR 1-10
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P130
Company Equipment ID:	TWR 1-11
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P131
Company Equipment ID:	TWR 1-12
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P132
Company Equipment ID:	TWR 2-1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P133
Company Equipment ID:	TWR 2-2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P134
Company Equipment ID:	TWR 2-3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P135
Company Equipment ID:	TWR 2-4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P136
Company Equipment ID:	TWR 2-5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P137
Company Equipment ID:	TWR 2-6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P138
Company Equipment ID:	TWR 2-7
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P139
Company Equipment ID:	TWR 2-8
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P140



Effective Date: To be entered upon final issuance

Company Equipment ID:	TWR 2-9
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P141
Company Equipment ID:	TWR 2-10
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P142
Company Equipment ID:	TWR 2-11
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P143
Company Equipment ID:	TWR 2-12
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P144
Company Equipment ID:	TWR 3-1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P145
Company Equipment ID:	TWR 3-2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P146
Company Equipment ID:	TWR 3-3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P147
Company Equipment ID:	TWR 3-4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P148
Company Equipment ID:	TWR 3-5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P149
Company Equipment ID:	TWR 3-6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P150
Company Equipment ID:	TWR 3-7
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P151
Company Equipment ID:	TWR 3-8
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P152
Company Equipment ID:	TWR 3-9



Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P153
Company Equipment ID:	TWR 3-10
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P154
Company Equipment ID:	TWR 3-11
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P155
Company Equipment ID:	TWR 3-12
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name:Emergency Generator Group1

Emissions Unit ID:	P001
Company Equipment ID:	GEN 1-1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	GEN 1-2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	GEN 1-3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P004
Company Equipment ID:	GEN 1-4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P005
Company Equipment ID:	GEN 1-5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P006
Company Equipment ID:	GEN 1-6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P007
Company Equipment ID:	GEN 1-7
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P008
Company Equipment ID:	GEN 1-8
Superseded Permit Number:	



Effective Date: To be entered upon final issuance

General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P009
Company Equipment ID:	GEN 1-9
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P010
Company Equipment ID:	GEN 1-10
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P011
Company Equipment ID:	GEN 1-11
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P012
Company Equipment ID:	GEN 1-12
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P013
Company Equipment ID:	GEN 1-13
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P014
Company Equipment ID:	GEN 1-14
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P015
Company Equipment ID:	GEN 1-15
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P016
Company Equipment ID:	GEN 1-16
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P017
Company Equipment ID:	GEN 1-17
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P018
Company Equipment ID:	GEN 1-18
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P019
Company Equipment ID:	GEN 1-19
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P020
Company Equipment ID:	GEN 1-20
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Effective Date: To be entered upon final issuance

Emissions Unit ID:	P021
Company Equipment ID:	GEN 1-21
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P022
Company Equipment ID:	GEN 1-22
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P023
Company Equipment ID:	GEN 1-23
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P024
Company Equipment ID:	GEN 1-24
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P025
Company Equipment ID:	GEN 1-25
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P026
Company Equipment ID:	GEN 1-26
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P027
Company Equipment ID:	GEN 1-27
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P028
Company Equipment ID:	GEN 1-28
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P029
Company Equipment ID:	GEN 1-29
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P030
Company Equipment ID:	GEN 1-30
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P031
Company Equipment ID:	GEN 1-31
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P032
Company Equipment ID:	GEN 1-32
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P033



Effective Date: To be entered upon final issuance

Company Equipment ID:	GEN 1-33
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P034
Company Equipment ID:	GEN 1-34
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P035
Company Equipment ID:	GEN 1-35
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P036
Company Equipment ID:	GEN 1-36
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P037
Company Equipment ID:	GEN 1-37
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P038
Company Equipment ID:	GEN 1-38
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P039
Company Equipment ID:	GEN 2-1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P040
Company Equipment ID:	GEN 2-2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P041
Company Equipment ID:	GEN 2-3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P042
Company Equipment ID:	GEN 2-4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P043
Company Equipment ID:	GEN 2-5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P044
Company Equipment ID:	GEN 2-6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P045
Company Equipment ID:	GEN 2-7



Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P046
Company Equipment ID:	GEN 2-8
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P047
Company Equipment ID:	GEN 2-9
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P048
Company Equipment ID:	GEN 2-10
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P049
Company Equipment ID:	GEN 2-11
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P050
Company Equipment ID:	GEN 2-12
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P051
Company Equipment ID:	GEN 2-13
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P052
Company Equipment ID:	GEN 2-14
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P053
Company Equipment ID:	GEN 2-15
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P054
Company Equipment ID:	GEN 2-16
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P055
Company Equipment ID:	GEN 2-17
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P056
Company Equipment ID:	GEN 2-18
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P057
Company Equipment ID:	GEN 2-19
Superseded Permit Number:	



General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P058
Company Equipment ID:	GEN 2-20
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P059
Company Equipment ID:	GEN 2-21
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P060
Company Equipment ID:	GEN 2-22
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P061
Company Equipment ID:	GEN 2-23
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P062
Company Equipment ID:	GEN 2-24
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P063
Company Equipment ID:	GEN 2-25
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P064
Company Equipment ID:	GEN 2-26
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P065
Company Equipment ID:	GEN 2-27
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P066
Company Equipment ID:	GEN 2-28
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P067
Company Equipment ID:	GEN 2-29
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P068
Company Equipment ID:	GEN 2-30
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P069
Company Equipment ID:	GEN 2-31
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



Effective Date: To be entered upon final issuance

Emissions Unit ID:	P070
Company Equipment ID:	GEN 2-32
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P071
Company Equipment ID:	GEN 2-33
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P072
Company Equipment ID:	GEN 2-34
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P073
Company Equipment ID:	GEN 2-35
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P074
Company Equipment ID:	GEN 2-36
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P075
Company Equipment ID:	GEN 2-37
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P076
Company Equipment ID:	GEN 2-38
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P077
Company Equipment ID:	GEN 3-1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P078
Company Equipment ID:	GEN 3-2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P079
Company Equipment ID:	GEN 3-3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P080
Company Equipment ID:	GEN 3-4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P081
Company Equipment ID:	GEN 3-5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P082



Effective Date: To be entered upon final issuance

Company Equipment ID:	GEN 3-6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P083
Company Equipment ID:	GEN 3-7
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P084
Company Equipment ID:	GEN 3-8
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P085
Company Equipment ID:	GEN 3-9
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P086
Company Equipment ID:	GEN 3-10
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P087
Company Equipment ID:	GEN 3-11
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P088
Company Equipment ID:	GEN 3-12
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P089
Company Equipment ID:	GEN 3-13
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P090
Company Equipment ID:	GEN 3-14
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P091
Company Equipment ID:	GEN 3-15
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P092
Company Equipment ID:	GEN 3-16
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P093
Company Equipment ID:	GEN 3-17
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P094
Company Equipment ID:	GEN 3-18



Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P095
Company Equipment ID:	GEN 3-19
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P096
Company Equipment ID:	GEN 3-20
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P097
Company Equipment ID:	GEN 3-21
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P098
Company Equipment ID:	GEN 3-22
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P099
Company Equipment ID:	GEN 3-23
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P100
Company Equipment ID:	GEN 3-24
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P101
Company Equipment ID:	GEN 3-25
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P102
Company Equipment ID:	GEN 3-26
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P103
Company Equipment ID:	GEN 3-27
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P104
Company Equipment ID:	GEN 3-28
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P105
Company Equipment ID:	GEN 3-29
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P106
Company Equipment ID:	GEN 3-30
Superseded Permit Number:	



Effective Date: To be entered upon final issuance

General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P107
Company Equipment ID:	GEN 3-31
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P108
Company Equipment ID:	GEN 3-32
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P109
Company Equipment ID:	GEN 3-33
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P110
Company Equipment ID:	GEN 3-34
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P111
Company Equipment ID:	GEN 3-35
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P112
Company Equipment ID:	GEN 3-36
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P113
Company Equipment ID:	GEN 3-37
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P114
Company Equipment ID:	GEN 3-38
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	HVLP = high volume, low pressure	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	LAER = lowest achievable emission rate	PM = particulate matter
BACT = Best Available Control Technology	lb(s)/hr = pound(s) per hour	PM ₁₀ = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	LDAR = leak detection and repair	PM _{2.5} = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act	LPG = liquefied petroleum gas/propane	ppb = parts per billion
CAM = compliance assurance monitoring	MACT = maximum achievable control technology	ppm = parts per million
CEMS = continuous emissions monitoring system	MAGLC = maximum acceptable ground level concentration	PSD = Prevention of Significant Deterioration
CFC = chlorofluorocarbon	mg/m ³ = milligrams per cubic meter	psi = pounds per square inch
CFR = Code of Federal Regulations	MM = million	psia = pounds per square inch absolute
CH ₄ = methane	MMBtu = million British Thermal Units	PTE = potential-to-emit
CI = compression ignition	MSDS = material safety data sheet	PTI = Permit-to-Install
CO = carbon monoxide	MSW = municipal solid waste	PTIO = Permit-to-Install and Operate
CO ₂ = carbon dioxide	NAAQS = National Ambient Air Quality Standard	PTO = Permit-to-Operate
COM = continuous opacity monitor	NESHAP = National Emission Standard for Hazardous Air Pollutants	PWR = process weight rate
DAPC = Division of Air Pollution Control	NG = natural gas	RACM = reasonably available control measures
DO/LAA = District Office/Local Air Agency	ng/m ³ = nanograms per cubic meter	RACT = reasonably available control technology
dscf = dry standard cubic foot	NH ₃ = ammonia	RATA = relative accuracy test audit
EAC = emissions activity category	NMHC = non-methane hydrocarbons	RTO = regenerative thermal oxidizer
eDocs = electronic documents database	NMOC = non-methane organic compound	SB265 = Senate Bill 265
ERAC = Environmental Review Appeals Commission	NO = nitrogen oxide	scfm = standard cubic feet per minute
ESP = electrostatic precipitator	NO ₂ = nitrogen dioxide	SI = spark ignition
EU = emissions unit	NO _x = nitrogen oxides	SIP = State Implementation Plan
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NSPS = New Source Performance Standard	SO ₂ = sulfur dioxide
FER = Fee Emissions Report	NSR = New Source Review	SSMP = startup, shutdown, and malfunction plan
FR = Federal Register	NTV = Non-Title V	TDS = total dissolved solids
GACT = generally achievable control technology	O&M = operation and maintenance	TLV = threshold limit value
GHG = greenhouse gases	OAC = Ohio Administrative Code	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	OC = organic compound	TPH = ton(s) per hour
H ₂ S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H ₂ SO ₄ = sulfuric acid	ORC = Ohio Revised Code	TSP = total suspended particulates
HAP = hazardous air pollutant	Pb = lead	VE = visible particulate emissions
HCl = hydrogen chloride	PBR = Permit-By-Rule	VMT = vehicle miles traveled
HF = hydrogen fluoride	PCB = polychlorinated biphenyl	VOC = volatile organic compound
Hg = mercury	PE = particulate emissions	WPP = work practice plan
hp = horsepower	PEMS = predictive emissions monitoring system	µg/m ³ = micrograms per cubic meter



**Environmental
Protection
Agency**

Draft Permit-to-Install

Bistrozzi LLC

Permit Number: P0138965

Facility ID: 0302022054

Effective Date: To be entered upon final issuance

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), Compliance Requirements
 - (4) Standard Term and Condition A.8., Air Pollution Nuisance
 - (5) Standard Term and Condition A.9., Reporting Requirements
 - (6) Standard Term and Condition A.10., Applicability
 - (7) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (8) Standard Term and Condition A.14., Public Disclosure
 - (9) 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
 - (10) Standard Term and Condition A.16., Fees
 - (11) 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 of 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) 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 Ohio EPA DAPC, Northwest District Office.
 - (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 Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted 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 to the Ohio EPA DAPC, Northwest District Office 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 semiannual 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 Ohio EPA DAPC, Northwest District Office 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) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

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

- b) 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.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office 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 Ohio EPA DAPC, Northwest District Office.
- 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 Ohio EPA DAPC, Northwest District Office. 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, 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) not exempt from the requirement to obtain a permit-to-install.

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 once by twelve months if application is made to the Director within a reasonable time before the termination date and the permittee 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 by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown 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 shut down 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 reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or any other 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 months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" 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 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.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

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.



**Environmental
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Permit Number: P0138965
Facility Name: Bistrozzi LLC
Facility ID: 0302022054
Working Copy of a Permit in Progress

B. Facility-Wide Terms and Conditions

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.
2. Unless other arrangements have been approved by the director, all notifications and reports shall be submitted through Ohio EPA's eBusiness Center: Air Services online web portal.
3. The Ohio EPA has determined that this facility operates affected sources that are subject to the requirements of 40 CFR, Part 63, Subpart ZZZZ, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines. Ohio EPA is not accepting the delegation authority to implement and enforce the area source NESHAP standard. The area source NESHAP standard is implemented and enforced by U.S. EPA, Region 5. The promulgated version of this NESHAP standard and the 40 CFR, Part 63, General Provisions may be accessed via the Internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov/> or by contacting the Ohio EPA, District Office or Local Air Agency.

The following affected sources are subject to the area source requirements of this NESHAP standard:

Emissions unit(s) P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P077, P078, P079, P080, P081, P082, P083, P084, P085, P086, P087, P088, P089, P090, P091, P092, P093, P094, P095, P096, P097, P098, P099, P100, P101, P102, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, and P115.

4. This permit establishes the following terms and conditions pursuant to OAC rule 3745-31-05(D).
 - a) Emission Limitations
 - (1) NO_x emissions shall not exceed 235.62 tons per rolling, 12-month period from emissions units P001 through P115; and
 - (2) CO emissions shall not exceed 96.06 tons per rolling 12-month period from emissions units P001 through P115.
 - b) Operational Restrictions
 - (1) The maximum hours of operation for emissions units P001 through P115 shall be limited by the following formulas for each rolling, 12-month period:

235.62 tons of NO_x ≥

$$\sum_{i=P001}^{P115} \left[\frac{(\text{NO}_x \text{ ER}_{\leq 25\% \text{ load},i})(H_{\leq 25\% \text{ load},i}) + (\text{NO}_x \text{ ER}_{> 25\% \text{ load},i})(H_{> 25\% \text{ load},i})}{2,000 \frac{\text{lb}}{\text{ton}}} \right]$$

and

96.06 tons of CO ≥



$$\sum_{i=P001}^{P115} \left[\frac{(\text{CO ER}_{\leq 25\% \text{ load},i})(H_{\leq 25\% \text{ load},i}) + (\text{CO ER}_{> 25\% \text{ load},i})(H_{> 25\% \text{ load},i})}{2,000 \frac{\text{lb}}{\text{ton}}} \right]$$

where:

i = each emissions unit, P001 through P115,

NOx ER_{≤25% load,i} = the NOx emissions rates, in lb/hr, for each emissions unit, i, when operating at less than or equal to 25% load, as provided in Table 1 below:

NOx ER_{>25% load,i} = the NOx emissions rates, in lb/hr, for each emissions unit, i, when operating at more than 25% load respectively, as provided in Table 1 below:

Table 1: NOx Emissions Rates

Emissions Units	lbs NOx/hr (≤ 25% Load)	lbs NOx/hr (> 25% Load)
P001-P114	12.15	75.78
P115	13.71	13.71

CO ER_{≤25% load,i} = the CO emissions rates, in lb/hr, for each emissions unit, i, when operating at less than or equal to 25% load, as provided in Table 2 below:

CO ER_{>25% load,i} = the CO emissions rates, in lb/hr, for each emissions unit, i, when operating at more than 25% load respectively, as provided in Table 2 below:

Table 2: CO Emissions Rates

Emissions Units	lbs CO/hr (≤ 25% Load)	lbs CO/hr (> 25% Load)
P001-P114	7.08	17.62
P115	7.72	7.72

H_{≤25% load,i} = the number of hours of operation for each emissions unit, i, while operating at less than or equal to 25% load during the rolling, 12-month period

H_{>25% load,i} = the number of hours of operation for each emissions unit, i, while operating at more than 25% load during the rolling, 12-month period

*These emission rates are based on the manufacturer’s design specifications as specified in permit application #A0080713, dated 12/02/2025. These emission rates are for both Ultra-low sulfur diesel (ULSD) and renewable diesel fuels such as Hydrotreated Vegetable Oils (HVO), as these are described in conditions C.1.b)(2)d.

c) **Monitoring and/or Recordkeeping Requirements**



- (1) The permittee shall maintain monthly records of the following information:
- a. the number of hours of operation for emissions units P001 through P115 while operating at less than or equal to 25% load;
 - b. the number of hours of operation for emissions units P001 through P115 while operating at more than 25% load;
 - c. the rolling, 12-month summation of NO_x emissions from emissions units P001 through P115, combined, in tons, calculated using the emissions rates specified in B.4.b)(1), Table 1 above; and
 - d. the rolling, 12-month summation of CO emissions from emissions units P001 through P115, combined, in tons, calculated using the emissions rates specified in B.4.b)(1), Table 2 above.

d) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all exceedances of the rolling, 12-month NO_x emissions limitation;
 - b. all exceedances of the rolling, 12-month CO emissions limitation;
 - c. the probable cause of each deviation (excursion);
 - d. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - e. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the director (Ohio EPA, DO/LAA).

e) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section a) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations

NO_x emissions shall not exceed 235.62 tons per rolling, 12-month period from emissions units P001 through P115

CO emissions shall not exceed 96.06 tons per rolling 12-month period from emissions units P001 through P115

Applicable Compliance Method



**Environmental
Protection
Agency**

Permit Number: P0138965

Facility Name: Bistrozzi LLC

Facility ID: 0302022054

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Compliance with the rolling, 12-month emissions limitations shall be determined in accordance with the monitoring and recordkeeping requirements specified in B.4.c)(1) above.



**Environmental
Protection
Agency**

Permit Number: P0138965
Facility Name: Bistrozzi LLC
Facility ID: 0302022054
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C. Emissions Unit Terms and Conditions

1. **Emissions Unit Group - Emergency Generator Group: P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P077, P078, P079, P080, P081, P082, P083, P084, P085, P086, P087, P088, P089, P090, P091, P092, P093, P094, P095, P096, P097, P098, P099, P100, P101, P102, P103, P104, P105, P106, P107, P108, P109, P110, P111, P112, P113, P114, P115**

EU ID	Operations, Property and/or Equipment Description
P001 -P038	Group 1 Emergency Generators, GEN 1-1 through GEN 1-38
P039-P076	Group 1 Emergency Generators, GEN 2-1 through GEN 2-38
P077-P114	Group 1 Emergency Generators, GEN 3-1 through GEN 3-38
P115	HUBGEN

- 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 operation(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 are identified below. 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(D) [Federally enforceable limitations to avoid NSR]	The NOx emissions from emissions units P001 through P115 combined shall not exceed 235.62 tons per rolling, 12-month period. The CO emissions from emissions units P001 through P115 combined shall not exceed 96.06 tons per rolling, 12-month period. See Facility-Wide Term and Condition B.4.



b.	OAC rule 3745-31-05(A)(3) [BAT for NOx]	Emission units P001 through P114 shall meet the standards established for NOx emissions in 40 CFR, Part 60, Subpart III. See b)(2)a. through b)(2)c.
c.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO, VOC, PM10, PM2.5 and SO2 emissions from emission units P001 through P114 since the potential to emit for each pollutant is less than 10 tons per year. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the NOx, CO, VOC, PM10, PM2.5 and SO2 emissions from emission unit P115 since the potential to emit for each pollutant is less than 10 tons per year.
d.	[40 CFR, Part 60, Subpart III: stationary emergency compression ignition (CI) internal combustion engine (ICE) greater than 560 kW with a displacement less than 10 liters/cylinder, Model Year 2006 or later] 40 CFR 1039, Appendix I, Table 2 - Tier 2 Emissions Standards	These emission units shall be certified to meet the following emissions standards: 0.20 grams PM/kW-hr 6.4 grams NOx + NMHC/kW-hr 3.5 grams CO/kW-hr See b)(2)a. through b)(2)c. and c)(1).
e.	40 CFR 60.4207(b)	The sulfur content of the diesel fuel burned in these emission units shall not exceed 15 ppm or 0.0015% sulfur by weight. See b)(2)d.
f.	40 CFR 1039.105 (certified by manufacturer)	The exhaust emissions from each engine shall not exceed: 20% opacity during the acceleration mode 15% opacity during the lugging mode 50% opacity during the peaks in either the acceleration or lugging modes



		See b)(2)b.
g.	40 CFR, Part 60, Subpart A	Table 8 to 40 CFR, Part 60, Subpart IIII- "Applicability of General Provisions to Subpart IIII" identifies which parts of the General Provisions in 40 CFR Part 60.1-19 apply.
h.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stacks serving these emission units shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
i.	OAC rule 3745-17-11(B)(5)(b)	Particulate emissions shall not exceed 0.062 lb/MMBtu actual heat input.
j.	OAC rule 3745-18-06(G)	SO ₂ emissions from emission units P001 through P114 shall not exceed 0.5 lb/MMBtu actual heat input. See b)(2)e.
k.	OAC rule 3745-110-03	See b)(2)f.

(2) Additional Terms and Conditions

- a. The emergency stationary compression ignition (CI) internal combustion engines (ICEs) are subject to and shall be operated in compliance with the requirements of 40 CFR, Part 60, Subpart IIII, standards of performance for stationary CI ICE.
- b. As specified in 40 CFR 60.4205(b), the emergency stationary CI ICEs have been or shall be purchased certified by the manufacturer to emission standards as stringent as those identified in 40 CFR 60.4202(a)(2), for P115, and 40 CFR 60.4202(b)(2), for P001 through P114, including the Tier 2 standards in 40 CFR 1039, Appendix I for engines greater than or equal to 750 horsepower (560 kW) and the smoke standards as specified in 40 CFR 1039.105.
- c. The emergency stationary ICEs must comply with the applicable requirements specified in 40 CFR 60.4211(f) in order to be considered an emergency stationary ICE under 40 CFR, Part 60, Subpart IIII.
- d. The emergency stationary CI ICEs shall burn only ultra-low sulfur diesel (ULSD) or renewable diesel fuels such as Hydrotreated Vegetable Oils (HVO), that meets the following conditions:
 - i. The fuel shall meet the ICE manufacturer’s fuel specifications for the specific make and model of engine; and
 - ii. The fuel shall not contravene the ICE’s Tier 2 certification.
 - iii. The ultra-low sulfur diesel fuel shall meet the following per-gallon ULSD standards, as specified by 40 CFR 1090.305:

- (a) A maximum sulfur content of 15 ppm (0.0015% sulfur by weight); and
 - (b) A cetane index or aromatic contents, as follows:
 - (i) A minimum cetane index of 40; or
 - (ii) A maximum aromatic content of 35 volume percent.
 - e. Pursuant to OAC 3745-18-06(B), stationary internal combustion engines which have rated heat input capacities equal to or less than 10 MMBtu/hr are exempt from OAC rule 3745-18-06(G). Therefore, the requirements of OAC 3745-18-06 do not apply to emissions unit P115.
 - f. In order to qualify for the exemption found in OAC Rule 3745-110-03(K)(2), these engines shall not be operated in any consecutive 12-month period equal to or exceeding 500 hours of operation. Note that this restriction on the hours of operation does not modify or supersede the hours of operation restriction (for maintenance checks and readiness testing) found in d)(2) of this permit. If an engine operation equals or exceeds 500 hours during any consecutive 12-month period, the NOx emissions shall not exceed 3.0 g/hp-hr; and the permittee shall demonstrate compliance in accordance with OAC 3745-110-05.
- c) **Operational Restrictions**
 - (1) The emergency stationary CI ICEs and any control devices shall be installed, operated, and maintained according to the manufacturer's emission-related written instructions and the permittee shall only change those emission-related settings that are allowed by the manufacturer. The CI ICEs must also be installed and operated to meet the applicable requirements from 40 CFR, Part 60, Subpart IIII; 40 CFR, Part 1039, Control of Emissions from New and In-use Nonroad CI Engines; and 40 CFR, Part 1068, the General Compliance Provisions for Engine Programs. The permittee shall operate and maintain the stationary CI ICE to achieve the emissions standards established in 40 CFR 60.4205 over the entire life of the engine(s).
- d) **Monitoring and/or Recordkeeping Requirements**
 - (1) The permittee shall maintain the manufacturer's certifications, to the applicable Tier 2 emission standards in 40 CFR 1039, Appendix I, on site or at a central location for all facility ICE and it shall be made available for review upon request. If the manufacturer's certification is not kept on site, the permittee shall maintain a log for the location of each ICE and it shall identify the agency-assigned emissions unit number, the manufacturer's identification number, and the identification number of the certificate. The manufacturer's operations manual and any written instructions or procedures developed by the permittee and approved by the manufacturer shall be maintained at the same location as the ICE.
 - (2) The permittee shall install a non-resettable hour meter prior to startup of each engine. Maintenance checks and readiness testing of the emergency ICE shall be limited to 100 hours per year; however, there is no time limit on operations during emergency situations. The



permittee may petition the Director for approval of additional hours for maintenance checks and readiness testing. Any operation of the emergency ICE during anything other than emergency situations and maintenance or readiness testing is prohibited.

- (3) The permittee shall maintain records of the following information for each period of time when each emissions unit was in operation:
 - a. the date and total number of hours the engine was in operation;
 - b. the reason the engine was in operation (e.g., emergency operation, non-emergency operation, maintenance checks and readiness testing); and
 - c. what classified the operation as an emergency, if applicable.
- (4) The permittee shall maintain the manufacturer's fuel specifications for the specific make and model of engine. For each shipment of ULSD or HVO received for burning in this emissions unit, the permittee shall maintain documentation of the total quantity of the fuel received and the fuel supplier's (or permittee's) analyses for sulfur content, in parts per million (40 CFR 1090.305) or percent by weight. The permittee shall perform or require the supplier to perform the analyses for sulfur content in accordance with 40 CFR 1090.1310, using the appropriate ASTM methods.
- (5) For each day during which the permittee burns fuel other than ULSD or HVO, the permittee shall maintain a record of the type, percent sulfur content, and quantity of fuel burned in the affected emissions unit.

e) Reporting Requirements

- (1) The permittee shall email Ohio EPA, DO/LAA a revised EAC form that identifies the serial number for each emergency generator within 30 days after placement on its concrete pad.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify exceedances of the following:
 - a. Any period of time (date and number of hours) that the quality of the fuel burned in these emission units did not meet the requirements established in 40 CFR 1090.305, based upon the required fuel records; and the amount of non-compliant fuel burned on each such occasion.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions in Section A of this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations

The NO_x emissions from emissions units P001 through P115 combined shall not exceed 235.62 tons per rolling, 12-month period.



The CO emissions from emissions units P001 through P115 combined shall not exceed 96.06 tons per rolling, 12-month period.

Applicable Compliance Method

Compliance shall be determined in accordance with the recordkeeping specified in B.4 above.

b. Emissions Limitations

The exhaust emissions from each engine shall not exceed:

- 6.4 g NO_x and NMHC/kW-hr
- 3.5 g CO/kW-hr
- 0.20 g PM/kW-hr

Applicable Compliance Method

Compliance with the emissions limitations above shall be based on the manufacturer's certification and by maintaining the engine according to the manufacturer's specifications.

If required, the permittee shall demonstrate compliance with the emissions limitations through performance tests conducted in accordance with the provisions in term f)(2) below.

c. Emissions Limitations

The sulfur content of the diesel fuel burned in these emission units shall not exceed 15 ppm or 0.0015% sulfur by weight.

Applicable Compliance Method

Compliance shall be determined using documents required in d)(4) above.

d. Emissions Limitations

The exhaust emissions from each engine shall not exceed:

- 20% opacity during the acceleration mode
- 15% opacity during the lugging mode
- 50% opacity during the peaks in either the acceleration or lugging modes

Applicable Compliance Method

The CI ICE shall be purchased certified to the opacity standards of 40 CFR 1039.105.

e. Emissions Limitation

Visible particulate emissions from the stacks serving these emission units shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method



If required, compliance with the stack visible particulate emissions limitations shall be determined through visible emissions observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A.

f. Emissions Limitation

Particulate emissions shall not exceed 0.062 lb/MMBtu actual heat input.

Applicable Compliance Method

Compliance shall be determined based on the manufacturer’s technical data sheet specified in permit application #A0080713, dated 12/02/2025 which specifies not-to-exceed PM emissions rates.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

g. Emissions Limitation

SO2 emissions from emission units P001 through P114 shall not exceed 0.5 lb/MMBtu actual heat input.

Applicable Compliance Method

Compliance shall be determined using documents required in d)(4) above. Emissions of SO2 shall be calculated in accordance with OAC rule 3745-18-04(F)(2) using the maximum fuel sulfur content of 15 ppm.

(2) If it is determined by the Ohio EPA that a compliance demonstration is required through performance testing, it shall be conducted using one of the following test methods or procedures:

- a. In accordance with 40 CFR 60.4212, conduct the exhaust emissions testing using the in-use testing procedures found in 40 CFR, Part 1039, Subpart F, measuring the emissions of the regulated pollutants as specified in 40 CFR 1065; or
- b. In accordance with 40 CFR 60.4212, conduct exhaust emissions testing using the test methods identified in Subpart IIII of 40 CFR Part 60.

If demonstrating compliance through the in-use testing procedures in 40 CFR, Part 1039, Subpart F, exhaust emissions from a stationary CI ICE shall not exceed the “not to exceed” (NTE) numerical requirements, rounded to the same number of decimal places as the applicable standard in 40 CFR 1039.101, determined from the following equation:

$$\text{NTE requirement for each pollutant} = 1.25 \times \text{STD}$$

Where:

STD = The standard specified for the pollutant in 40 CFR 1039.101.

g) **Miscellaneous Requirements**

(1) None.

2. Emissions Unit Group – Cooling tower Group: P120, P121, P122, P123, P124, P125, P126, P127, P128, P129, P130, P131, P132, P133, P134, P135, P136, P137, P138, P139, P140, P141, P142, P143, P144, P145, P146, P147, P148, P149, P150, P151, P152, P153, P154, P155

EU ID	Operations, Property and/or Equipment Description
P120 -P131	non-contact cooling towers with drift eliminators #1-1 through #1-12
P132-P143	non-contact cooling towers with drift eliminators #2-1 through #2-12
P144-P155	non-contact cooling towers with drift eliminators #3-1 through #3-12

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) See b)(1)a., b)(2)a., c)(1), d)(1), d)(2), d)(3), e)(1) and f)(1).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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(E)	PM ₁₀ emissions shall not exceed 0.025 lb/hr, as a monthly average, and 0.11 ton/yr, for each emissions unit individually. PM _{2.5} emissions shall not exceed 0.009 lb/hr, as a monthly average, and 0.04 ton/yr, for each emissions unit individually. Visible PE shall not exceed 10% opacity, as a six-minute average. See b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to PM ₁₀ and PM _{2.5} emissions from these air contaminant sources since the potential to emit of each cooling tower is less than 10 tons per year, taking into account the restrictions established under OAC rule 3745-31-05(E).
c.	OAC rule 3745-17-07(A)	See b)(2)b.
d.	OAC rule 3745-17-11(B)	See b)(2)c.

(2) Additional Terms and Conditions

- a. The state-only emission limitations specified in b)(1)a. are established for the purpose of limiting PM₁₀ and PM_{2.5} emissions to avoid state modeling requirements. These state-only restrictions are established under OAC rule 3745-31-05(E) and are based on the operational restrictions in c)(1).
- b. The visible emission limitation specified by this rule is less stringent than the visible emission limitation established pursuant to OAC rule 3745-31-05(E).
- c. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(E).

c) Operational Restrictions

(1) The following operational restrictions have been included in this permit for the purpose of establishing legally and practically enforceable requirements which limit potential to emit [see b)(2)a.]:

- a. These emissions units shall employ a drift eliminator achieving “drift loss” equal to or less than 0.001 percent; and
- b. The permittee shall maintain the water flowrate and total dissolved solids (TDS) content of the circulating cooling water at no greater than the levels specified in permit application #A0080713, dated 12/02/2025.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall collect and record the following information for each emissions unit individually:

- a. The permittee shall test and record the TDS content in mg/l or ppm, of the cooling water at least once per month using USEPA approved test procedures or an equivalent method approved by the Ohio EPA, Northwest District Office (NWDO).

(2) Each month, the permittee shall calculate and record PM₁₀ and PM_{2.5} emissions, in lbs/hr, as a monthly average for each emissions unit individually. The PM₁₀ and PM_{2.5} shall be calculated as follows:

$$\text{PM}_{10} \text{ and } \text{PM}_{2.5} \text{ in lbs/hr} = (\text{FR}) \times (0.00001) \times (\text{TDS}/1,000,000) \times (60 \text{ min/hr}) \times (8.34 \text{ lb/gal}) \times (\text{F})$$

Where:

FR = the maximum water flow rate, in gallons/min;

0.00001 = the maximum drift loss factor;

TDS = the TDS concentration, in ppm (on a monthly average basis, if more than one measurement is taken in a month);

8.34 lbs/gal = conversion factor for pounds per gallon (density of water); and

F = 0.6481 for emissions of PM₁₀*



F = 0.2363 for emissions of PM_{2.5}*

*The PM₁₀ and PM_{2.5} fractions of total PM are from Permit Memorandum 2023-0960-TVR3 from the Oklahoma Department of Environmental Quality.

- (3) Each month, the permittee shall use the information in d)(2) to calculate the year-to-date PM₁₀ and PM_{2.5} emissions, in tons, from January to December.

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify any exceedances of the maximum water flow rate and TDS contents specified in permit application #A0080713, dated 12/02/2025.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the standard terms and conditions of this permit.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b)(1) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emissions Limitation

PM₁₀- 0.025 lb/hr, as a monthly average, for each emissions unit individually

PM_{2.5}- 0.009 lb/hr, as a monthly average, for each emissions unit individually

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in d)(2) of the terms and conditions of this permit.

- b. Emissions Limitation

PM₁₀- 0.11 ton/yr for each emissions unit individually

PM_{2.5}- 0.04 ton/yr for each emissions unit individually

Applicable Compliance Method

Compliance shall be based upon the recordkeeping requirements specified in d)(3) of the terms and conditions of this permit.

- c. Emission Limitation

Visible PE shall not exceed 10% opacity, as a six-minute average.

Applicable Compliance Method

If required, compliance with the visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR, Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) None.



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