



EPA

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July 16, 2013

CERTIFIED WARNING LETTER

CERTIFIED MAIL

Ms. Claudia Ferrini
Environmental Health & Safety Manager
Oberlin College
173 West Lorain Street
Oberlin, OH 44074-1092

RE: Division of Air Pollution Control Compliance Evaluation for the operations located at Oberlin College, Oberlin, Ohio - DAPC Facility ID No. (0247100408)

Dear Ms. Ferrini:

On 3/14/2013, Ohio EPA representative Christine McPhee visited the above-named site to determine compliance with the permits issued by the Division of Air Pollution Control (DAPC), and other applicable requirements. Additional information received on 3/22/2013, 6/07/2013 and 6/13/2013, was also reviewed. The time and courtesy given by Mr. David Pastorius, the Facilities Manager, and you was greatly appreciated. An electronic copy of the inspection report will be e-mailed to you.

The purpose of this letter is to provide a follow-up to the inspection. A review of the steam flow outputs from (B003) 49 million Btu/hr. (mmBtu/hr.) natural gas & no. 2 oil boiler no.3 had numerous deviations with the operating restriction of 36,925 lbs. steam/hr. output. Ohio EPA requests an identification of the probable cause(s) of these deviations and additional information regarding the natural gas fuel input to boiler no. 3.

Operating Restriction to Limit Natural Gas Input to 49 mmBtu/hr. at B003

Oberlin College presented compliance plan proposals on 10/21/2012, 11/22/2011, and 11/29/2011, to de-rate boiler no. 3 from 64.6 mmBtu/hr. fuel input to 49 mmBtu/hr. input by restricting the steam flow output to 38,158 lbs. steam/hr. A 2/03/2012, Ohio EPA letter approved the compliance plan proposal and acknowledged that B003 would no longer be subject to the nitrogen oxides (NO_x) emissions limit of 0.10 lb. NO_x/mmBtu actual heat input, specified in Ohio Administrative Code (OAC) rule 3745-110-03(B). After reconsideration, Oberlin College's 4/02/2012, letter made a revision to the operating restriction to 36,925 lbs. steam/hr. output.

Ohio EPA understands that B003 is typically employed during the fall and spring months. A review of the 11/12/2012 – 12/22/2012, period found the following deviations with the operating restriction of 36,925 lbs. steam/hr. output:

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- 39 for 1 hr., 18:00, 11/12/12;
- 38 for 1 hr., 20:00, 11/12/12;
- 38 for 1 hr., 09:00, 11/17/12;
- 38 for 1 hr., 22:00, 11/19/12;
- 38 for 1 hr., 23:00, 11/23/12;
- 38 - 42 for 8 hrs., 08:00 – 15:00, 11/24/12;
- 38 – 41 for 6 hrs., 18:00 – 13:00, 11/27/12;
- 38 – 45 for 4 hrs., 07:00 – 10:00, 11/28/12;
- 38 - 41 for 5 hrs., 08:00- 12:00, 12/05/12;
- 38 - 41 for 1 hr. or more, 07:00, 12/13/12;
- 39 - 41 for 8 hrs., 14:00 -21:00, 12/21/12; and
- 39 - 45 for 5 hrs., 08:00 – 12:00, 12/22/2012.

1. Please submit a report that includes the following information for B003:
 - a. An identification of any deviations that occurred after 12/22/2012;
 - b. The probable cause(s) of each deviation during the 11/12/2012 – 12/31/2012 period; and
 - c. Any corrective actions or preventive measures taken for each deviation.
2. A discussion of the natural gas fuel input to boiler, mmBtu/hr., during the deviation periods.

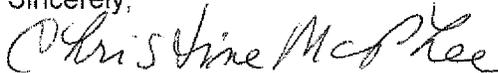
Ohio EPA understands that a flow meter that reads the natural gas fuel input to B003 was recently installed. Application no. A0047636, submitted on 6/05/2013, is for the modification of B003 to replace the original natural gas burner with a low NO_x burner, employ flue gas recirculation and increase the de-rated capacity from 49 mmBtu/hr. to 63 mmBtu/hr.

3. Please provide an interim plan for assuring a 49 mmBtu/hr. fuel input to B003 until the boiler's design may be modified upon issuance of a final Permit-to-Install (PTI).

Please submit the information requested in item nos. 1 through 3 by 8/16/2013. If you are unable to respond to any part of this request within the time frame(s) discussed above, please inform this Agency.

Should you have any comments or questions about this correspondence, please do not hesitate to contact me at (330) 963-1205, or via e-mail at christine.mcphee@epa.ohio.gov.

Sincerely,



Christine McPhee
Environmental Specialist
Division of Air Pollution Control

CM:bo

cc: Misty Koletich, Ohio EPA, NEDO, DAPC
Claudia Ferrini, Oberlin College - claudia.ferrini@oberlin.edu
Dave Pastorius, Oberlin College - dave.pastorius@oberlin.edu