



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 467-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

November 16, 2009

NOV AT TITLE V HIGH PRIORITY FACILITY - GC7

CERTIFIED MAIL

Mr. Dave Pastorius
Central Heating Plant Manager
Oberlin College
173 West Lorain Street
Oberlin, OH 44074-1092

RE: Request for a compliance plan to operate the ESP control device within the power input operating restriction of the Title V operating permit for Oberlin College - DAPC Facility ID No. (02-47-10-0408)

Dear Mr. Pastorius:

On 2/10/09 and 3/09/09 we received your initial and revised proposals to re-establish the minimum power input operating parameter of the electrostatic precipitator (ESP) during a performance demonstration test via U.S. EPA Method 5 for particulate emissions (PE). It is our understanding that the test, scheduled for 3/17/09, was cancelled because the steam distribution system does not have a release mechanism if excess steam is generated during warm weather or other conditions.

Ohio EPA requests the submittal of a compliance plan by **12/16/09** to maintain a minimum electric power input to the ESP, which controls the PE rate from both coal-fired boilers (B001 & B002).

Title V Operating Permit Requirements for the ESP Control and Reported Deviations

For B001 and B002 each, Part III. term A.II.2. requires that the average total combined power input (in kilowatts - KW) to all fields of the ESP, for any 3-hour block of time when the emissions unit is in operation, shall be no less than 90% of the total combined power input, as a 3-hour average, established during the most recent emissions test that demonstrated the emission unit was in compliance with the particulate emissions limitation of 0.20 lb PE per million Btu (0.20 lb PE/mmBtu), the combined actual heat input of both boilers. The submitted quarterly deviation reports note the following occasions when the 90% power input to the ESP requirement was not met:

ESP OPERATING PARAMETER REQUIREMENTS & REPORTED DEVIATIONS				
Test Data:	4/07/07 Method 5B test on B001 or 4/05/07 Method 5B test on B002			
Average Power Input, KW, rolling 3-hr average during test	Minimum Power Input, KW, rolling 3-hr average	Time Period	Actual Power input Range, KW, rolling 3-hr average	Days of Deviations
7.03	6.33	04/07/07 - 05/18/07	unspecified	40
		11/11/07 - 12/31/07	unspecified	19
		01/14/08 - 02/06/08	0.00, 2.23 - 5.41	5
Test Data:	3/21/08 Method 5 test on B001			
6.49	5.84	03/21/08 - 03/31/08	0.00, 5.16 - 5.83	6
		04/01/08 - 05/01/08	0.00, 2.21 - 5.78	20
		11/08/08 - 12/31/08	0.00, 1.50 - 5.83	52
		01/01/09 - 03/31/09	1.39 - 5.83	78
		04/01/09 - 06/30/09	0.98 - 5.83	33

Mr. Dave Pastorius
Oberlin College
November 16, 2009
Page 2

Compliance Options

If Oberlin College wishes to continue operation of either of the coal-fired boilers (B001 or B002), then the following options are available:

- A. Operate the ESP at a minimum input of 5.84 KW, as a rolling 3-hour average, at all times either or both coal-fired boilers are in operation, except as exempted when the ESP inlet temperature is below 250oF during a start-up or shutdown event.
 - B. Establish revised values for ESP operating parameters with another ESP performance test that demonstrates compliance with the 0.20 lb PE/mmBtu limit, as the combined actual heat input of both boilers.
1. Please submit a compliance schedule by **12/16/09**, which includes proposed dates for the following milestones:
 - a. Submittal of a compliance schedule;
 - b. Selection of a compliance option(s);
 - c. If an outside contractor is employed to develop the compliance measures, the awarding of a contract to a contractor(s);
 - d. Implementation of the compliance measure(s);
 - e. Submittal of a report on the compliance measure(s) implementation; and
 - f. Additional milestones that Oberlin College determines are important to the compliance plan should be included.
 2. If the performance test option is chosen, then the following information should be included in the test proposal:
 - a. Submittal of a completed Intent to Test form within 30 days of the proposed test date(s). We recommend that you include an alternate test date in addition to the first test date. The revised Intent to Test form is available at our newly re-named website at: <http://www.epa.ohio.gov/>. Then at top of page, click on "Air", select "Files to Download", look for "Emissions Monitoring (Stack Testing)" and select "Intent to Test Notification Form".
 - b. An explanation of the practical limitations of the steam distribution system in regards to boiler operation.

- c. The test must be conducted under a "worst case" scenario when the highest PE rate to the ESP inlet would be expected.
 - i. Can both boilers be run at the highest coal throughput rates? If not, please explain.
 - ii. An identification of production parameters to document that the boilers were run under a worst case scenario (i.e. lbs coal used/hr; steam load, etc.).
- d. A discussion of the coal fuel sampling and analysis to document the actual heat input in million Btu for each sample period.
- e. An identification of ESP control operating parameters that will be recorded and submitted with the test report for each sample period:
 - i. for each of two TR sets:
 - (1) current - i.e. mA;
 - (2) voltage - i.e. kV; and
 - (3) average current and average voltage values for each 60-min sample period as well as the minimum & maximum values for each TR set.
 - ii. for the combined power input to ESP (i.e. kW):
 - (1) for each sample period; and
 - (2) the 3-hour average of the combined power input as well as the minimum and maximum values.

If you wish, you may find it helpful to discuss your plans with us prior to completing the compliance plan schedule or Intent to Test Notification form. Oberlin College and Ohio EPA can have a telephone conference meeting or you may come to our Twinsburg, Ohio office for an in-person meeting.

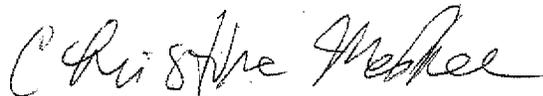
Please submit a compliance schedule by **12/16/09**. If the performance test option is chosen, please submit a completed Intent to Test form and the additional requested information within 30 days of the proposed test date(s). If you are unable to respond to any part of this request within the time frame(s) discussed above, please inform this Agency. Failure to respond to this request in a timely manner can result in a referral to the Central Office of Ohio EPA for the appropriate enforcement action.

The submission of the requested information does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in ORC 3704.06 or for U.S. EPA to seek civil penalties pursuant to federal law. Ohio EPA will decide whether to pursue or decline to pursue penalties regarding this matter at a later date.

Mr. Dave Pastorius
Oberlin College
November 16, 2009
Page 4

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.state.oh.us.

Sincerely,



Christine McPhee
Environmental Specialist
Division of Air Pollution Control

CM/mt

cc: Tim Fischer, Ohio EPA, NEDO, DAPC
Tom Kalman, Ohio EPA, CO, DAPC
Lisa Holscher, U.S. EPA, Region V

ec: Ed Fasko, Ohio EPA, NEDO, DAPC
Dave Pastorius, Oberlin College
Claudia Ferrini, Oberlin College