



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Lazarus Gov.
Center

**RE: DRAFT PERMIT TO INSTALL MODIFICATION
MONTGOMERY COUNTY
Application No: 08-04153
Fac ID: 0857042072**

CERTIFIED MAIL

DATE: 1/12/2006

Dayton Power and Light Company
Amy Wright
1065 Woodman Drive
Dayton, OH 45342-4103

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install modification for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit modification. 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 proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit modification should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install modification may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install modification a fee of **\$ 1750** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA

RAPCA

Miami Valley Regional Planning Commission

KY

IN

MONTGOMERY COUNTY

PUBLIC NOTICE

**ISSUANCE OF DRAFT PERMIT TO INSTALL 08-04153 FOR AN AIR CONTAMINANT SOURCE FOR
Dayton Power and Light Company**

On 1/12/2006 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **Dayton Power and Light Company**, located at **2101 Arbor Blvd, Dayton, Ohio**.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 08-04153:

appeal settlement.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

John Paul, Regional Air Pollution Control Agency, 117 South Main Street, Dayton, OH 45422-1280
[(937)225-4435]



**Permit To Install
Terms and Conditions**

**Issue Date: To be entered upon final issuance
Effective Date: To be entered upon final issuance**

DRAFT MODIFICATION OF PERMIT TO INSTALL 08-04153

Application Number: 08-04153
Facility ID: 0857042072
Permit Fee: **To be entered upon final issuance**
Name of Facility: Dayton Power and Light Company
Person to Contact: Amy Wright
Address: 1065 Woodman Drive
Dayton, OH 45342-4103

Location of proposed air contaminant source(s) [emissions unit(s)]:
**2101 Arbor Blvd
Dayton, Ohio**

Description of proposed emissions unit(s):
Appeal settlement.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Dayton Power and Light Company

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Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit-To-Install General Terms and Conditions

1. Monitoring and Related Recordkeeping 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:
 - i. The date, place (as defined in the permit), and time of sampling or measurements.
 - ii. The date(s) analyses were performed.
 - iii. The company or entity that performed the analyses.
 - iv. The analytical techniques or methods used.
 - v. The results of such analyses.
 - vi. 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:
 - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
 - ii. 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 appropriate Ohio EPA District Office or local air agency. The written

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reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency 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 semi-annual report, which states that no deviations occurred during that period.
 - iv. If this permit is for an emissions unit located at a Title V facility, then 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.

2. 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 appropriate Ohio EPA District Office or local air agency 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).

3. 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

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permittee shall comply with the requirement to register such a plan.

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4. 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.

5. Severability Clause

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.

6. General Requirements

- a. The permittee must comply with all terms and conditions of this permit. 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

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permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

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7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any 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. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

- a. 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:
 - i. 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.
 - ii. 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.
 - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

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- iv. 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.

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- c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency 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:
 - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - ii. 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.

10. Permit-To-Operate Application

- a. If 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 (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).
- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this permit is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. Air Pollution Nuisance

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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.

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13. Permit-To-Install

A permit-to-install must be obtained pursuant to OAC Chapter 3745-31 prior to "installation" of "any air contaminant source" as defined in OAC rule 3745-31-01, or "modification", as defined in OAC rule 3745-31-01, of any emissions unit included in this permit.

B. State Only Enforceable Permit-To-Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. 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 appropriate Ohio EPA District Office or local air agency.
- 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 appropriate Ohio EPA District Office or local air agency. 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 (i.e., postmarked) 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.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

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4. Authorization To Install or Modify

If applicable, authorization to install or modify any new or existing 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 modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

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.

6. 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.

7. 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).

8. Construction Compliance Certification

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If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) that the facility has been constructed in accordance with the permit-to-install application and the terms and conditions of the permit-to-install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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 (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit-To-Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
Particulates/PM-10	46.12
Nitrogen oxides	1373.32
Carbon monoxide	724
Sulfur dioxide	138.6
Sulfuric acid mist	12.64
Volatile organic compounds	31.64
Formaldehyde	5.92

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Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. NSPS REQUIREMENTS

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

<u>Source Number</u>	<u>Source Description</u>	<u>NSPS Regulation (Subpart)</u>
P001 - P004	four 80 MW stationary gas turbines Subpart GG	

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

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

- a. construction date (no later than 30 days after such date);
- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
- c. actual start-up date (within 15 days after such date); and
- d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P.O. Box 163669
Columbus, OH 43216-3669

and

Regional Air Pollution Control Agency
117 S. Main Street

Dayton, OH 45422

2. PSD REQUIREMENTS

The source described in this Permit to Install is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the

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United States Environmental Protection Agency 40 CFR 52.21. The authority to apply and enforce the PSD regulations has been delegated to the Ohio Environmental Protection Agency. The terms and conditions of this permit and the requirements of the PSD regulations are also enforceable by the United States Environmental Protection Agency.

In accordance with 40 CFR 124.15, 124.19 and 124.20, the following shall apply: (1) the effective date of this permit shall be 30 days after the service of notice to any public commentors of the final decision to issue, modify, or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service of notice; and (2) if an appeal is made to the Environmental Appeals Board of the United States Environmental Protection Agency, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

Appeals will be addressed to:

United States Environmental Protection Agency
Environmental Appeals Board
401 M Street, SW (MC-113do)
Washington, DC 20460

3. Nitrogen Oxides (NO_x) Budget Trading Program

OAC Chapter 3745-14

- a. Office of Regulatory Information System Facility Code - 2847
- b. The following regulated electrical generating units are subject to the applicable requirements specified in OAC Chapter 3745-14: P001, P002, P003, and P004. These units are new regulated electrical generating units. Annual NO_x allowance allocations were not established for these new units when OAC Chapter 3745-14 was promulgated. The annual NO_x allowance allocations for emissions units P001, P002, P003, and P004 for calendar years 2005 through 2007 will be established in accordance with OAC rule 3745-14-05(C)(4). Pursuant to OAC rule 3745-14-05(B)(2), the annual NO_x allowance allocations for emissions units P001, P002, P003, and P004 for calendar years 2008 through 2012 will be established in accordance with OAC rules 3745-14-05(C)(1) and 3745-14-05(C)(2).
- c. The emissions units identified in Section A.3.b above are NO_x budget units under OAC rule 3745-14-01(C)(1).
- d. The NO_x authorized account representative shall submit a complete NO_x budget permit application in accordance with the deadlines specified in paragraphs (B)(2) and (B)(3) of OAC rule 3745-14-03. The NO_x authorized account representative shall also submit, in a timely manner, any supplemental

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information that the Director determines is necessary in order to review a NO_x budget permit application and issue or deny a NO_x budget permit.

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- e. Beginning May 31, 2004, the owners and operators of each NO_x budget source and each NO_x budget unit at the source shall hold NO_x allowances available for compliance deductions under paragraph (E) of OAC rule 3745-14-06, as of the NO_x allowance transfer deadline, in the unit's compliance account and the source's overdraft account in an amount not less than the total NO_x emissions for the control period from the unit, as determined in accordance with OAC rule 3745-14-08, plus any amount necessary to account for actual utilization under paragraph (C)(5) of OAC rule 3745-14-05 for the control period.
- f. NO_x allowances shall be held in, deducted from, or transferred among NO_x allowance tracking system accounts in accordance with OAC rules 3745-14-05, 3745-14-06, 3745-14-07, and 3745-14-09.
- g. A NO_x allowance shall not be deducted, in order to comply with the requirement under paragraph (E)(3)(a) of OAC rule 3745-14-01, for a control period in a year prior to the year for which the NO_x allowance was allocated.
- h. Each ton of NO_x emitted in excess of the NO_x budget emission limitation, as defined in OAC rule 3745-14-01(B)(2)(yy), shall constitute a separate violation of OAC Chapter 3745-14, the Clean Air Act, and applicable Ohio law. The owners and operators of a NO_x budget unit that has excess emissions in any control period shall surrender the NO_x allowances required for deduction under paragraph (E)(4)(a) of OAC rule 3745-14-06 and pay any fine, penalty, or assessment or comply with any other remedy imposed under paragraph (E)(4)(c) of OAC rule 3745-14-06.
- i. When recorded by the Administrator pursuant to OAC rules 3745-14-06 and 3745-14-07, every allocation, transfer, or deduction of a NO_x allowance to or from a NO_x budget unit's compliance account or the overdraft account of the source where the unit is located is deemed to amend automatically, and become a part of, any NO_x budget permit of the NO_x budget unit by operation of law without any further review.
- j. Except as provided below, the Director shall revise the NO_x budget permit, as necessary, in accordance with OAC rule 3745-77-08.

Each NO_x budget permit is deemed to incorporate automatically the definitions of terms under paragraph (B) of OAC rule 3745-14-01 and, when recorded by the Administrator, in accordance with OAC rules 3745-14-06 and 3745-14-07, every allocation, transfer, or deduction of a NO_x allowance

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to or from the compliance accounts of the NO_x budget units covered by the permit or the overdraft account of the NO_x budget source covered by the permit.

- k. The owner or operator of a NO_x budget unit shall comply with the prohibitions under OAC rule 3745-14-08(A)(5).
- l. The owners and operators of the NO_x budget unit shall keep on site at the source each of the following documents for a period of five years from the date the document is created: (This period may be extended for cause, at any time prior to the end of five years, in writing by the Director or Administrator.)
 - i. the account certificate of representation for the NO_x authorized account representative for the NO_x budget unit and all documents that demonstrate the truth of the statements in the account certificate of representation, in accordance with paragraph (D) of OAC rule 3745-14-02, provided that the certificate and documents shall be retained on site at the source beyond such five-year period until such documents are superseded because of the submission of a new account certificate or representation changing the NO_x authorized account representative;
 - ii. all emission monitoring information, in accordance with OAC rule 3745-14-08;
 - iii. copies of all reports, compliance certifications, and other submissions and all records made or required under the NO_x budget trading program; and
 - iv. copies of all documents used to complete a NO_x budget permit application and any other submission under the NO_x budget trading program or to demonstrate compliance with the requirements of the NO_x budget trading program.
- m. The permittee shall operate and maintain equipment to continuously monitor and record nitrogen oxides emissions from these emissions units in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in Part III, Section A.III.1 and 40 CFR Part 75.

- n. The permittee shall comply with the monitoring plan requirements of 40 CFR Part 75.62, except that the monitoring plan shall also include all of the information required by Subpart H of 40 CFR Part 75.
- o. The NO_x authorized account representative of the NO_x budget unit shall submit the reports and compliance certifications required under the NO_x budget trading program, including those under OAC rules 3745-14-04 and 3745-14-08, to the Director and Administrator.
- p. Each submission under the NO_x budget trading program shall be submitted, signed, and certified by the NO_x authorized account representative for each NO_x budget source on behalf of which the submission is made. Each such submission shall include the following certification statement by the NO_x authorized account representative:

"I am authorized to make this submission on behalf of the owners and operators of the NO_x budget sources or NO_x budget units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment."

If the NO_x authorized account representative for a NO_x budget unit subject to an acid rain emission limitation who signed and certified any submission that is made under Subpart F or G of 40 CFR Part 75 and which includes data and information required under OAC rule 3745-14-08 or Subpart H of 40 CFR Part 75 is not the same person as the designated representative or the alternate designated representative for the unit under 40 CFR Part 72, then the submission shall also be signed by the designated representative or the alternate designated representative.

- q. The NO_x authorized account representative shall submit quarterly reports that include all of the data and information required in Subpart H of 40 CFR Part 75 for each NO_x budget unit (or group of units using a common stack) and the data and information in Subpart G of 40 CFR Part 75. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30 and October 30 of each year and shall be submitted in the manner specified in Subpart H of 40 CFR Part 75 and 40 CFR Part 75.64.
- r. The NO_x authorized account representative shall submit to the Administrator a compliance certification in support of each quarterly report based on a reasonable inquiry of those persons with primary responsibility for ensuring that all of the unit's emissions are correctly and fully monitored. The compliance

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certification shall state that:

- i. the monitoring data submitted were recorded in accordance with the applicable requirements of OAC rule 3745-14-08 and 40 CFR Part 75, including the quality assurance procedures and specifications; and
 - ii. for a unit with add-on NO_x emission controls and for all hours where data are substituted in accordance with 40 CFR Part 75.34(a)(1), the add-on emission control were operating within the range of parameters listed in the quality assurance program under Appendix B of 40 CFR Part 75 and the substitute values do not systematically underestimate the NO_x emissions.
- s. The NO_x authorized account representative for a NO_x budget unit shall submit written notice of monitoring system certification and re-certification test dates to the Director and the Administrator in accordance with 40 CFR Part 75.61. The NO_x authorized account representative shall submit a certification application to the Administrator, U.S. EPA, Region V Office, and the Director within forty-five

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days after completing all initial or re-certification tests required under paragraph (B) of OAC rule 3745-14-08, including the information required under Subpart H of 40 CFR Part 75.

- t. For each control period in which one or more NO_x budget units at a source are subject to the NO_x budget emission limitation, the NO_x authorized account representative of the source shall submit to the Director and the Administrator, by November 30 of that year, a compliance certification report for each source covering all such units.

The NO_x authorized account representative shall include the following elements in the compliance certification report, in a format prescribed by the Administrator, concerning each unit at the source and subject to the NO_x budget emission limitation for the control period covered by the report:

- i. identification of each NO_x budget unit;
 - ii. at the NO_x authorized account representative's option, the serial numbers of the NO_x allowances that are to be deducted from each unit's compliance account under paragraph (E) of OAC rule 3745-14-06 for the control period;
 - iii. at the NO_x authorized account representative's option, for units sharing a common stack and having NO_x emissions that are not monitored separately or apportioned in accordance with OAC rule 3745-14-08, the percentage of allowances that is to be deducted from each unit's compliance account under paragraph (E)(5) of OAC rule 3745-14-06; and
 - iv. the compliance certification under paragraph (A)(3) of OAC rule 3745-14-04.
- u. In the compliance certification report under Section A.3.t.iv above, the NO_x authorized account representative shall certify, based upon reasonable inquiry of those persons with the primary responsibility for operating the source and the NO_x budget units at the source in compliance with the NO_x budget trading program, whether each NO_x budget unit for which the compliance certification is submitted was operated during the calendar year covered by the report in compliance with the requirements of the NO_x budget trading program applicable to the unit, including all the following:

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- i. whether the unit was operated in compliance with the NO_x budget emission limitation;
- ii. whether the monitoring plan that governs the unit has been maintained to reflect the actual operation and monitoring of the unit, and contains all information necessary to attribute NO_x emissions to the unit, in accordance with OAC rule 3745-14-08;
- iii. whether all the NO_x emissions from the unit, or group of units (including the unit) using a common stack, were monitored or accounted for through the missing data procedures and reported in the quarterly monitoring reports, including whether conditional data were reported in the quarterly reports in accordance with OAC rule 3745-14-08, and if conditional data were reported, the permittee shall indicate whether the status of all conditional data has been resolved and all necessary quarterly report submissions have been made; and
- iv. whether the facts that form the basis for certification under OAC rule 3745-14-08 of each monitor at the unit or group of units (including the unit) using a common stack, or for using an excepted monitoring method or alternative monitoring method approved under OAC rule 3745-14-08, if any, have changed.

If a change is required to be reported under Section A.3.u.iv above, specify the nature of the change, the reason for the change, when the change occurred, and how the unit's compliance status was determined subsequent to the change, including what method was used to determine emissions when a change mandated the need for monitor re-certification.

- v. The NO_x authorized account representative shall submit a complete NO_x budget permit renewal application for the NO_x budget source covering the NO_x budget units at the source in accordance with paragraph (E) of OAC rule 3745-77-08.
- w. The emission measurements recorded and reported in accordance with OAC rule 3745-14-08 shall be used to determine compliance by the unit with the NO_x budget emission limitation under paragraph (E)(3) of OAC rule 3745-14-01.
- x. The permittee shall develop and maintain a written quality assurance/quality control plan for each continuous NO_x monitoring system designed to ensure continuous valid and representative readings of NO_x emissions in units of the

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applicable standard. The plan shall follow the requirements of 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous NO_x monitoring system must be kept on-site and available for inspection during regular office hours.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P001 - natural gas and No. 2 fuel oil fired simple cycle stationary combustion turbine No. 4 - Tait CT4, with a nominal production rating of 80 MW and a nominal heat input of 1115.2 mmBtu/hour, with dry low NOx combustion and water injection controls	40 CFR Part 52, Section 52.21 and OAC rule 3745-31-10 through OAC rule 3745-31-20

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		<u>Applicable Emissions Limitations/Control Measures</u>
		Particulate/PM10 emissions from this emissions unit shall not exceed 0.013 lb/mmBtu actual heat input when firing natural gas; 0.026 lb/mmBtu actual heat input when firing No. 2 fuel oil, and 46.12 TPY as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004.
OAC rule 3745-31-05 (C) Synthetic minor to avoid PSD rule requirements	40 CFR Part 75	Nitrogen oxides (NO _x) emissions from this emissions unit shall not exceed 15 ppmv at 15% oxygen on a dry basis at full load, when firing natural gas, based on a one-hour average as determined through data from the NO _x continuous emission monitoring system (CEMs); 161 lbs/hr at all operating loads when firing natural gas; 42 ppmv at 15% oxygen on a dry basis at full load, when firing No.2 fuel oil, based on a one-hour average as determined through data from the NO _x CEMs; 269 lbs/hr at all operating loads when firing No. 2 fuel oil; and 1373.32 TPY as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004.
OAC rule 3745-31-05 (C) Synthetic minor to avoid MACT rule requirements	OAC rule 3745-17-11(B)(4) OAC rule 3745-18-06(F) 40 CFR Part 60, Subpart GG	
OAC rule 3745-17-07(A)(1)	OAC rules 3745-21-08 (B) and 3745-23-06 (B)	Carbon monoxide (CO) emissions from this emissions unit shall not exceed, during the first 12 months of operation, 25 ppmv at 15% oxygen on a dry basis, when firing natural gas and No. 2 fuel oil, based on a 3-hour test average at full load; after the first 12 months of operation, 20 ppmv at 15% oxygen on a dry basis,
OAC rule 3745-31-05(A)(3)		

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when firing natural gas and No. 2 fuel oil, based on a 3-hour test average at full load (also see A.2.g).

actual heat input and 12.64 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004.

than the emission limitations established pursuant to 40 CFR Part 52, Sections 52.21 and OAC rules 3745-31-10 through 3745-31-20.

CO emissions from this emissions unit shall not exceed 301 lbs/hr at all operating loads, excluding start-up and shutdown periods when firing natural gas; 413 lbs/hr during start-up and shutdown periods when firing natural gas; 800 lbs/hr at all operating loads, when firing No. 2 fuel oil; and 724 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004, including periods of start-up and shutdown.

Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 31.64 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004.

See A.I.2.d. below

Formaldehyde emissions from this emissions unit shall not exceed 5.92 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004.

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

VOC emissions from this emissions unit shall not exceed 4 lbs/hr when firing natural gas and 5.5 lbs/hr when firing No. 2 fuel oil.

Sulfur dioxide (SO₂) emissions from this emissions unit shall not exceed 0.0026 lb/mmBtu actual heat input, when firing natural gas; 0.055 lb/mmBtu actual heat input, when firing No. 2 fuel oil; and 138.6 tons/year as a rolling, 12-month summation combined from units P001, P002, P003 and P004.

Formaldehyde emissions from this emissions unit shall not exceed 0.000713 lb formaldehyde/mmBtu actual heat input.

The requirements of this rule also include compliance with the requirements of 40 CFR Part 52, Section 52.21 and OAC rules 3745-31-10 through 3745-31-20; OAC rule 3745-31-05 (C); and OAC rule 3745-17-07(A)(1).

Sulfuric acid mist emissions from this emissions unit, during oil-firing only, shall not exceed 0.0054 lb/mmBtu,

See Part I, term A.4.

The emission limitations specified by these rules are less stringent

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- 2.a** The listed particulate/PM10 emission limitations are more stringent than the requirements of OAC rule 3745-17-11(B)(4). They were chosen by the applicant to ensure compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20 and 40 CFR Part 52, Section 52.21 "Prevention of significant deterioration of air quality".
- 2.b** The listed nitrogen oxides emission limitations are more stringent than the requirements of 40 CFR Part 60, Subpart GG and OAC rule 3745-23-06. They were chosen by the applicant to ensure compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20 and 40 CFR Part 52, Section 52.21 "Prevention of significant deterioration of air quality".
- 2.c** The listed sulfur dioxide emission limitations are more stringent than the requirements of 40 CFR Part 60, Subpart GG and OAC rule 3745-18-06(F). They were chosen by the applicant to ensure compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20 and 40 CFR Part 52, Section 52.21 "Prevention of significant deterioration of air quality".
- 2.d** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology (BAT) and best available control technology (BACT) requirements established pursuant to this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally approved SIP for Ohio.

On February 15, 2005, OAC rule 3745-23-06 was rescinded; therefore, it is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally

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approved SIP for Ohio.

The listed NOx and CO emission limitations were chosen by the applicant to ensure compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20 and 40 CFR Part 52, Section 52.21 "Prevention of significant deterioration of air quality".

- 2.e** The following Best Available Control Technology (BACT) determinations have been made in accordance with the PSD regulations:

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Particulate/PM10 Emissions - The BACT determination is the use of only clean burning fuels, natural gas and No. 2 fuel oil in these combustion turbines, capable of meeting the emission limitations listed in Part III A.I.1.

Nitrogen oxide emissions - The BACT determination is the use of dry low-NOx burners (DLNB) when firing natural gas and water injection when firing fuel oil and the ppmv NOx levels listed in Part III A.I.1.

Carbon monoxide emissions - The BACT determination is the use of efficient combustion technology inherent to the design of the combustion turbines and the ppmv CO levels listed in Part III A.I.1.

Sulfur dioxide emissions - The BACT determination is the use of natural gas as the primary fuel and No. 2 fuel oil as back-up fuel in these combustion turbines and a maximum sulfur content of 0.05 percent by weight of the fuel oil.

Sulfuric acid mist emissions - The BACT determination is the use of natural gas as the primary fuel and No. 2 fuel oil as the back-up fuel in these combustion turbines.

- 2.f** "Start-up" shall be defined as the time necessary to bring a turbine on line from a no-load condition to dry low NOx combustion mode during natural gas combustion, not to exceed thirty (30) minutes. Shutdown periods shall not exceed thirty (30) minutes.
- 2.g** If the permittee shows that the unit cannot consistently meet the CO ppm limitations, Ohio EPA will consider an application to modify the permit to install.
- 2.h** "Full load" shall be defined as all periods when the hourly average electrical output exceeds 72 MW.
- 2.i** Based on the evaluation of the PM10 emissions from this emissions unit, it was determined that the PM10 emissions did not trigger the Prevention of Significant Deterioration (PSD) permitting requirements. Therefore, the regulated pollutant for purposes of this permit is particulate emissions and compliance with the particulate emission limitation shall be determined in accordance with the U.S. EPA approved test methods for particulate emissions.
- 2.j** In lieu of monitoring the exhaust stack gas flowrate as required by 40 CFR Part 60, Appendix B - Performance Specification 6, the permittee shall use a certified NOx continuous emissions monitoring system in conjunction with a fuel flow

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monitor as described in 40 CFR Part 75, and certified CO continuous emissions monitoring system in conjunction with a fuel flow monitor (in a manner similar to that used for NOx) to meet these requirements. The relative accuracy requirements of Performance Specifications 6 shall apply to the NOx and CO continuous emissions monitoring systems.

II. Operational Restrictions

1. The maximum annual operating hours for emissions units P001, P002, P003 and P004 combined shall not exceed 10016 ** while burning natural gas and 4216 ** when burning No. 2 fuel oil, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004, the permittee shall not exceed the cumulative operating hours specified in the following table:

Month	Maximum allowable cumulative operating hours while burning natural gas	Maximum allowable cumulative operating hours while burning No. 2 fuel oil
1	2504 1056	
1 - 2	5008	2108
1 - 3	7512	3164
1 - 4	10016	4216
1 - 5	10016	4216
1 - 6	10016	4216
1 - 7	10016	4216
1 - 8	10016	4216
1 - 9	10016	4216
1 - 10	10016	4216
1 - 11	10016	4216
1 - 12	10016	4216

**The permittee may combust 1.2 additional hours of natural gas for every hour fuel oil is not combusted, up to 15020 hours annually of natural gas combustion.

After the first 12 calendar months of operation following the startup of any one of the emissions units P001 through P004, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

2. The sulfur content of the No. 2 fuel oil fired in this emissions unit shall not exceed

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0.05% , by weight.

3. In order to establish federally enforceable limitations upon the potential to emit for CO, the permittee shall utilize the continuous CO monitoring system to demonstrate continuous compliance with the hourly and combined annual emission limitations established by this permit.
4. The permittee shall burn only pipeline quality natural gas or number two fuel oil in this emissions unit.

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1. Statement of Certification - NOx Monitoring
 - a. Prior to the installation of the continuous NOx monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2 for approval by the Ohio EPA, Central Office.
 - b. Within 60 days of the startup of this emissions unit, the permittee shall conduct certification tests of the continuous NOx monitoring system pursuant to the applicable requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 2, and 40 CFR Part 75. Personnel from the Regional Air Pollution Control Agency shall be notified 30 days prior to the initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the Regional Air Pollution Control Agency within 30 days after the test is completed. Certification of the continuous NOx monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all the applicable requirements of ORC section 3704.03(I), 40 CFR Part 60, Appendix B, Performance Specification 2 and 40 CFR Part 75.
 - c. The permittee shall operate and maintain equipment to continuously monitor and record NOx emissions from this emissions unit in units of applicable standard(s). Such continuous monitoring and recording equipment shall comply with the applicable requirements specified in 40 CFR Part 60 and 40 CFR Part 75.
 - d. Each continuous monitoring system consists of all the equipment used to acquire and record data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.
 - e. The permittee shall maintain on-site documentation from the US EPA or the Ohio EPA that the continuous NOx monitoring system has been certified in accordance with the applicable requirements specified in 40 CFR Part 60 and Part 75. The letter of certification shall be made available to the Director upon request.
 - f. The permittee shall maintain records of the following data obtained by the continuous NOx monitoring system: emissions of NOx in ppmvd at 15% oxygen

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at full load on an hourly average basis, emissions of NO_x in lbs/hr, and results of daily zero/span calibration checks, results of quarterly cylinder gas audits, linearity check, or relative accuracy test audits, and magnitude of manual calibration adjustments.

- g. The permittee shall develop a written quality assurance/quality control plan for the continuous NO_x monitoring system designed to ensure continuous valid and representative readings of NO_x emissions in units of the applicable standard(s). The plan shall follow the applicable requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook documenting the activities related to the continuous NO_x monitoring system must be kept on site and available for inspection during regular office hours.
 - h. The permittee may conduct the relative accuracy test audits for the continuous nitrogen oxides monitoring system in accordance with the frequencies required for monitoring systems subject to 40 CFR Part 75, Appendix B; however, the permittee is still required to provide the audit results in units of the applicable standard(s), in accordance with 40 CFR Part 60. Cylinder gas audits may be conducted in accordance with the frequencies specified in 40 CFR Part 75, Appendix B for linearity checks. In addition, linearity checks conducted pursuant to 40 CFR Part 75, Appendix B, may be used in place of quarterly cylinder gas audits, as required in 40 CFR Part 60.
 - i. Whenever the monitoring system fails to meet the quality assurance or data validation requirements of 40 CFR Part 75, data shall be substituted using the applicable procedures in Subpart D, Appendix D, or Appendix E of 40 CFR Part 75.
2. Statement of Certification - CO Monitoring
- a. Prior to the installation of the continuous CO monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 4 for approval by the Ohio EPA, Central Office.
 - b. Within 60 days of the startup of this emissions unit, the permittee shall conduct certification tests of the continuous CO monitoring system pursuant to the applicable requirements of ORC section 3704.03(I), 40 CFR Part 60, Appendix

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B, Performance Specification 4. Personnel from the Regional Air Pollution Control Agency shall be notified 30 days prior to the initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the Regional Air Pollution Control Agency within 30 days after the test is completed. Certification of the continuous CO monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all the applicable requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 4 .

- c. The permittee shall operate and maintain equipment to continuously monitor and record CO emissions from this emissions units in units of the applicable

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- standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.
- d. Each continuous monitoring system consists of all the equipment used to acquire and record data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.
 - e. The permittee shall maintain on-site documentation from the USEPA or the Ohio EPA that the continuous CO monitoring system has been certified in accordance with 40 CFR Part 60. The letter of certification shall be made available to the Director upon request.
 - f. The permittee shall maintain records of the following data obtained by the continuous CO monitoring system: emissions of CO in lbs/hr, results of daily zero/span calibration checks, results of quarterly cylinder gas audits, linearity checks or relative accuracy test audits, and magnitude of manual calibration adjustments.
 - g. The permittee shall develop a written quality assurance/quality control plan for the continuous CO monitoring system designed to ensure continuous valid and representative readings of CO emissions in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook documenting the activities related to the continuous CO monitoring system must be kept on site and available for inspection during regular office hours.
 - h. The permittee may conduct the relative accuracy test audits for the continuous carbon monoxide monitoring system in accordance with the frequencies required for monitoring systems subject to 40 CFR Part 75, Appendix B; however, the permittee is still required to provide the audit results in units of the applicable standard(s), in accordance with 40 CFR Part 60. Cylinder gas audits may be conducted in accordance with the frequencies specified in 40 CFR Part 75, Appendix B for linearity checks. In addition, linearity checks conducted pursuant to 40 CFR Part 75, Appendix B, may be used in place of quarterly cylinder gas audits, as required in 40 CFR Part 60.
3. In accordance with 40 CFR Part 60, Subpart GG, Section 60.334(h)(1), the permittee shall monitor the sulfur content of the fuel being fired in the turbine except as provided in 40 CFR 60.334(h)(3). The frequency of determination of this value shall be in accordance with 40 CFR 60.334(i).

4. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or the oil supplier's analyses for sulfur content and heat content, and the calculated SO₂ emission rate (in lb/mmBtu).
5. Pursuant to 40 CFR 60.334(i)(1) or (3), the permittee shall determine fuel sulfur content in accordance with the requirements of 40 CFR 60.335(b)(10)(i) and 60.335(b)(10)(ii).
6. For each day during which the permittee burns a fuel other than pipeline quality natural gas or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
7. The permittee shall maintain monthly records of the following information:
 - a. The summation of the operating hours for this emissions unit, in hours/month, when burning natural gas and/or when burning No. 2 fuel oil. The summation of the operating hours for emissions units P001, P002, P003 and P004 combined when burning natural gas. The summation of the operating hours for emissions units P001, P002, P003 and P004 combined when burning fuel oil.
 - b. During the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004, the cumulative operating hours for each calendar month when burning natural gas and/or when burning No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined. Following the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004, the rolling, 12-month summation of the operating hours for this emissions unit, in hours per rolling, 12-month period when burning natural gas and/or when burning No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined.
 - c. The actual heat input of this emissions unit, in mmBtu/month, when burning natural gas and/or when burning No. 2 fuel oil.
 - d. The rolling, 12-month summation of the particulate/PM₁₀, NO_x, CO, SO₂, sulfuric acid mist, VOC, and formaldehyde emissions, in tons, for emissions units P001, P002, P003 and P004 combined. The monthly emissions shall be added to the total emissions from the previous 11 months to determine the rolling, 12-month summation of emissions.
 - e. The permittee shall monitor and record all periods of time when the unit is operated at "full load" conditions, based upon definition of full load in Section A.1.2.h.

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- f. The date, time and duration, in minutes of each start-up and shutdown. (The terms start-up and shutdown are defined in Section A.1.2.f.)

- 8. If the permittee uses 40 CFR Part 75 Appendix D to comply with the SO₂ emissions limit, the permittee shall install, operate and maintain equipment to continuously monitor and record the actual fuel flow to this emissions unit when the emissions unit is in operation. Such continuous monitoring and recording equipment shall comply with the

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requirements specified in 40 CFR Part 75. If the fuel flow monitoring and/or recording equipment is (are) not in service when the emissions unit is in operation, the permittee shall comply with the appropriate missing data procedures specified in 40 CFR Part 75.

9. The permittee shall install, operate and maintain equipment to continuously monitor and record the percent oxygen in the stack serving this emissions unit when the emissions unit is in operation. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75. The monitoring and recording equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

IV. Reporting Requirements

1. Continuous NOx Emissions Monitoring
 - a. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting the date, commencement and completion time, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of NOx values in excess of the applicable emission limitations specified in the terms and conditions of this permit.
 - b. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting any continuous NOx monitoring system downtime while the emissions unit was on line (date, time, duration, and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.
 - c. If there are no excess NOx emissions during the calendar quarter, the permittee shall submit a statement to that effect along with date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and

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shall address the data obtained during the previous calendar quarter.

2. Continuous CO Emissions Monitoring

- a. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting the date, commencement and completion time, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of CO values in excess of the applicable hourly emission limitations specified in the terms and conditions of this permit (413 lbs/hr during start-up and shutdown periods, when burning natural gas, 301 lbs/hour, at all operating loads, excluding start-up and shutdown periods, when burning natural gas and 800 lbs/hour, at all operating loads, when burning No. 2 fuel oil).
- b. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting any continuous CO monitoring system downtime while the emissions unit was on line (date, time, duration, and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.
- c. If there are no CO excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

3. The permittee shall submit quarterly deviation (excursion) reports to the Regional Air Pollution Control Agency that identify any exceedances of the following:

- a. For the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004, all exceedances of the maximum allowable cumulative operating hour limits while burning natural gas and/or No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined.
- b. Beginning after the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004, the rolling, 12-month operating hour limitations while burning natural gas and/or No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined.

- c. Any exceedances of the rolling, 12-month summation of particulate/PM10, NOx, CO, SO2, sulfuric acid mist, VOC, or formaldehyde emission limitations, in tons, for emissions units P001, P002, P003 and P004, combined.
- d. Any exceedances of the NOx ppmv at 15% oxygen on a dry basis emission limitations at full load conditions.
- e. The allowable duration for all start-up and shutdown periods.
- f. For fuel oil, any exceedances of the 0.05% by weight sulfur content and the calculated SO2 emissions rate, in lb/mmBtu.
- g. Any time during which the permittee burns a fuel other than pipeline quality natural gas or number two fuel oil.

These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

- 4. The permittee shall submit quarterly reports which identify each period during which an exemption for ice-fog provided in 40 CFR Part 60.332(f) is in effect. The reports shall include the ambient conditions existing during the period, the date and time the air pollution control system was deactivated, and the date and time when the air pollution control system was reactivated. These reports shall be postmarked by April 30, July 30, October 30, and January 30 and each report shall cover the previous calendar quarter.

V. Testing Requirements

- 1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation -

0.013 lb (particulate emissions/PM10)/mmBtu actual heat input, when firing natural gas

0.026 lb particulate emissions/PM10)/mmBtu actual heat input, when firing No. 2 fuel oil

Applicable Compliance Method -

If required, compliance shall be based upon stack testing in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A and 40 CFR Part 51, Appendix M, Method 201 or 201A and 202, as specified in A.V.2.

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b. Emission Limitation -

46.12 tons/year particulate emissions/PM10 as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.6. and shall be determined through a summation of the particulate emissions/PM10 from the burning of natural gas and No. 2 fuel oil as follows:

- i. The monthly particulate emissions/PM10 from the burning of natural gas shall be determined by multiplying the average emissions in lb particulate/PM10 emissions/mmBtu while burning natural gas derived from the stack test conducted in accordance with A.V.2. by the actual heat input of this emissions unit for the month while burning natural gas, and dividing by 2,000 lbs/ton.
- ii. The monthly particulate emissions/PM10 from the burning of No. 2 fuel oil shall be determined by multiplying the average emissions in lb particulate/PM10 emissions/mmBtu while burning No. 2 fuel oil derived from the stack test conducted in accordance with A.V.2. by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil, and dividing by 2,000 lbs/ton.
- iii. The combined rolling, 12-month summation of the particulate emissions/PM10 for emissions units P001, P002, P003 and P004 shall be the sum of (i) and (ii) above for each emissions unit for the rolling, 12-month period.

c. Emission Limitations -

15 ppmvd NOx at 15% oxygen, at full load, while burning natural gas, based on a 1-hour average as determined through data from the NOx CEMs

42 ppmvd NOx at 15% oxygen, at full load, while burning No. 2 fuel oil, based on a 1-hour average as determined through data from the NOx CEMs

161 lbs/hour nitrogen oxides at all operating loads, while burning natural gas

269 lbs/hour nitrogen oxides, at all operating loads, while burning No. 2 fuel oil

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Applicable Compliance Method -

Initial compliance with the allowable outlet concentration, and the lbs/hour NOx emission limitations shall be demonstrated by the performance testing as specified in A.V.2. and continual compliance shall be demonstrated by the use of the CEM specified in A.III.1. and the applicable 40 CFR Part 60 and 75 requirements. Emissions calculated using the 40 CFR Part 75 bias adjustment factor or using missing data procedures due to monitor downtime shall not be used to determine compliance with the hourly emission limitation.

d. Emission Limitation -

1373.32 tons/year NOx as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined through the use of CEMs as specified in A.III.1.

The monthly NOx emissions shall be added to the total NOx emissions from the previous eleven months to determine the rolling, 12-month summation of NOx emissions.

e. Emission Limitations -

during the first 12 months of operation, 25 ppmvd CO at 15% oxygen as a 3-hr test average at full load, when firing natural gas and No. 2 fuel oil; after the first 12 months of operation, 20 ppmvd CO at 15% oxygen as a 3-hr test average at full load, when firing natural gas and No. 2 fuel oil

Applicable Compliance Method -

Compliance shall be determined through stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10, as specified in A.V.2.

Emission Limitations -

413 lbs CO/hour during start-up and shutdown periods, while burning natural gas

301 lbs CO/hour at all operating loads, excluding start-up and shutdown periods, while burning natural gas

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800 lbs CO/hour at all operating loads, while burning No. 2 fuel oil

Applicable Compliance Method -

Compliance with the hourly emission limitations shall be based upon the data from the continuous CO emissions monitoring system requirement and the monitoring/record keeping as specified in A.III.2. Except for the start-up and shutdown emissions limit, compliance shall also be determined through stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10, as specified in A.V.2.

f. Emission Limitation -

724 tons/year CO, as a rolling, 12-month summation combined from units P001, P002, P003 and P004, including periods of start-up and shutdown

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined through the use of CEMs as specified in A.III.2. The monthly CO emissions shall be added to the total CO emissions from the previous eleven months to determine the rolling, 12-month summation of CO emissions.

g. Emission Limitation -

0.0026 lb SO₂/mmBtu actual heat input, while burning natural gas
0.055 lb SO₂/mmBtu actual heat input, while burning No. 2 fuel oil

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Applicable Compliance Method -

When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel. If required, the permittee shall perform or require the supplier to perform an analysis of the natural gas for sulfur content, in accordance with the appropriate ASTM method , or an equivalent method as approved by the Director, in order to demonstrate compliance with this emission limitation using the appropriate equation specified in AP-42 Table 3.1-2a (4/00). When firing number two fuel oil, compliance shall be based upon the fuel analysis and record keeping requirements specified in A.II.2. and A.III.4. and the use of the equations specified in OAC rule 3745-18-04(F).

h. Emission Limitation -

138.6 tons/year SO₂ as a rolling, 12-month summation combined from units P001, P002, P003 and P004

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined through a summation of the SO₂ emissions from the burning of natural gas and No. 2 fuel oil as follows:

- i. The monthly SO₂ emissions from the burning of natural gas shall be determined by multiplying the USEPA default value for pipeline quality natural gas (0.0006 lb SO₂/mmBtu) by the actual heat input of this emissions unit for the month while burning natural gas, and dividing by 2,000 lbs/ton.
- ii. The monthly SO₂ emissions from the burning of No. 2 fuel oil shall be determined by multiplying the average calculated SO₂ emission rate (determined as an arithmetic average of the calculated SO₂ emission rates for the shipments received each month in A.III.4. (lb/mmBtu)) by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil, and dividing by 2,000 lbs/ton.
- iii. The combined rolling, 12-month summation of the SO₂ emissions for emissions units P001, P002, P003 and P004 shall be the sum of (i) and (ii) above for each emissions unit for the rolling, 12-month period.

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- i. Emission Limitation -
0.0054 lb sulfuric acid mist/mmBtu actual heat input

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Applicable Compliance Method -

Compliance shall be based upon stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 8 as specified in A.V.2.

j. Emission Limitation -

12.64 tons/year sulfuric acid mist, as a rolling, 12-month summation combined from units P001, P002, P003 and P004

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined by multiplying the average emissions in lb sulfuric acid mist/mmBtu derived from the stack test conducted in accordance with A.V.2. by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil, and dividing by 2,000 lbs/ton. The monthly sulfuric acid mist emissions for each emissions units P001, P002, P003 and P004 shall be summed and added to the total sulfuric acid mist emissions from the previous eleven months to determine the combined rolling, 12-month summation of sulfuric acid mist emissions for emissions units P001, P002, P003 and P004.

k. Emission Limitation -

4 lbs/hour VOC, while burning natural gas
5.5 lbs/hour VOC, while burning No. 2 fuel oil

Applicable Compliance Method -

Compliance shall be based upon stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A, as specified in A.V.2.

l. Emission Limitation -

31.64 tons/year VOC, as a rolling, 12-month summation combined from units P001, P002, P003 and P004

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined through a summation of the VOC emissions from the burning of

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natural gas and No. 2 fuel oil as follows:

- i. The monthly VOC emissions from the burning of natural gas shall be determined by multiplying the average emissions in lb VOC/hour while burning natural gas derived from the stack test conducted in accordance with A.V.2. by the operating hours for the month while burning natural gas, and dividing by 2,000 lbs/ton.
- ii. The monthly VOC emissions from the burning of No. 2 fuel oil shall be determined by multiplying the average emissions in lb VOC/hour while burning No. 2 fuel oil derived from the stack test conducted in accordance with A.V.2. by the operating hours for the month while burning No. 2 fuel oil, and dividing by 2,000 lbs/ton.
- iii. The combined rolling, 12-month summation of the VOC emissions for emissions units P001, P002, P003 and P004 shall be the sum of (i) and (ii) above for each emissions unit, for the rolling, 12-month period.

m. Emission Limitation -

0.000713 lb formaldehyde/mmBtu actual heat input

Applicable Compliance Method -

When firing natural gas, compliance shall be based upon stack testing in accordance with USEPA Method SW846, as specified in A.V.2. When firing No. 2 fuel oil, compliance shall be based upon the AP-42 Table 3.1-4 (4/00) emission factor of 0.00028 lb formaldehyde/mmBtu.

n. Emission Limitation -

5.92 tons/year formaldehyde, as a rolling, 12-month summation combined from units P001, P002, P003 and P004

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined through a summation of the formaldehyde emissions from the burning of natural gas and No. 2 fuel oil as follows:

- i. The monthly formaldehyde emissions from the burning of natural gas shall

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be determined by multiplying the average emissions in lb formaldehyde/mmBtu while burning natural gas derived from the stack test conducted in accordance with A.V.2. by the actual heat input of this emissions unit for the month while burning natural gas, divided by 2,000 lbs/ton.

- ii. The monthly formaldehyde emissions from the burning of No.2 fuel oil shall be determined by multiplying the AP-42 Table 3.1-4 (4/00) of 0.00028 lb formaldehyde/mmBtu while burning No. 2 fuel oil by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil , divided by 2,000 lbs/ton.
 - iii. The combined rolling, 12-month summation of the formaldehyde emissions for emissions units P001, P002, P003 and P004 shall be the sum of (i) and (ii) above for each emissions unit for the rolling, 12-month period.
- o. Emission Limitation -
- 20% opacity, as a six-minute average
- Applicable Compliance Method -
- Compliance shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.
- p. Emission Limitation -
- 0.05% sulfur, by weight, of the No. 2 fuel oil
- Applicable Compliance Method -
- Compliance shall be based upon fuel oil sampling as specified in A.III.3, A.III.4, and A.III.5.
- q. Emission Limitation -
- 10,016 hours of operation, as a rolling, 12-month summation while burning natural gas
- 4,216 hours of operation, as a rolling, 12-month summation while burning No. 2

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1.2 hours of operation of natural gas may be added for every hour No. 2 fuel oil is not burned, with total natural gas operation not to exceed 15,020 hours as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 60 days after start-up of this emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the particulates/PM10, NOx, CO, VOC, formaldehyde (while burning natural gas), and sulfuric acid mist (while burning No. 2 fuel oil) emission rates.

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- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for particulates/PM10, Methods 1 through 5 of 40 CFR Part 60, Appendix A and 40 CFR Part 51, Appendix M, Method 201 or 201A and 202 ; for NOx, Methods 1 through 4 and 7 or 7E of 40 CFR Part 60, Appendix A; for CO, Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A; for VOC, Methods 1 through 4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A; for formaldehyde, Method SW846; for sulfuric acid mist, Methods 1 through 4 and 8 of 40 CFR Part 60, Appendix A . Alternative U.S. EPA approved test methods may be used with prior approval from RAPCA.

** the permittee has requested that if the average emission rate (lbs/hour) derived from the stack test conducted in accordance with this terms is less than the permit VOC allowable listed in term A.I.1., it may apply for an air permit to install modification to increase the hours of operation. The permittee realizes that this modification might trigger the requirement to secure either an administrative or a new air permit to install.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Regional Air Pollution Control Agency . The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Regional Air Pollution Control Agency's refusal to accept the results of the emission test(s).

Personnel from the Regional Air Pollution Control Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Regional Air Pollution Control Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Regional Air Pollution Control Agency .

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - natural gas and No. 2 fuel oil fired simple cycle stationary combustion turbine No. 4 - Tait CT4, with a nominal production rating of 80 MW and a nominal heat input of 1115.2 mmBtu/hour, with dry low NOx combustion and water injection controls	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P001) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: formaldehyde

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TLV (mg/m3): 0.37

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.6971

MAGLC (ug/m3): 8.81

Pollutant: beryllium

TLV (mg/m3): 0.002

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.0008

MAGLC (ug/m3): 0.05

Pollutant: arsenic

TLV (mg/m3): 0.01

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.0123

MAGLC (ug/m3): 0.24

Pollutant: benzene

TLV (mg/m3): 1.60

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.2142

MAGLC (ug/m3): 38.10

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Pollutant: sulfuric acid mist

TLV (mg/m3): 1.00

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Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 13.56

MAGLC (ug/m3): 23.81

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

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- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P002 - natural gas and No. 2 fuel oil fired simple cycle stationary combustion turbine No. 5 - Tait CT5, with a nominal production rating of 80 MW and a nominal heat input of 1115.2 mmBtu/hour, with dry low NOx combustion and water injection controls	40 CFR Part 52, Section 52.21 and OAC rule 3745-31-10 through OAC rule 3745-31-20

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		<u>Applicable Emissions Limitations/Control Measures</u>
<p>OAC rule 3745-31-05 (C) Synthetic minor to avoid PSD rule requirements</p>	<p>40 CFR Part 75</p>	<p>Particulate/PM10 emissions from this emissions unit shall not exceed 0.013 lb/mmBtu actual heat input when firing natural gas; 0.026 lb/mmBtu actual heat input when firing No. 2 fuel oil, and 46.12 TPY as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004.</p>
<p>OAC rule 3745-31-05 (C) Synthetic minor to avoid MACT rule requirements</p>	<p>OAC rule 3745-17-11(B)(4) OAC rule 3745-18-06(F) 40 CFR Part 60, Subpart GG</p>	<p>Nitrogen oxides (NO_x) emissions from this emissions unit shall not exceed 15 ppmv at 15% oxygen on a dry basis at full load, when firing natural gas, based on a one-hour average as determined through data from the NO_x continuous emission monitoring system (CEMs); 161 lbs/hr at all operating loads when firing natural gas; 42 ppmv at 15% oxygen on a dry basis at full load, when firing No.2 fuel oil, based on a one-hour average as determined through data from the NO_x CEMs; 269 lbs/hr at all operating loads when firing No. 2 fuel oil; and 1373.32 TPY as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004.</p>
<p>OAC rule 3745-17-07(A)(1)</p>	<p>OAC rules 3745-21-08 (B) and 3745-23-06 (B)</p>	<p>Carbon monoxide (CO) emissions from this emissions unit shall not exceed,</p>
<p>OAC rule 3745-31-05(A)(3)</p>		<p>during the first 12 months of operation, 25 ppmv at 15% oxygen on a dry basis, when firing natural gas and No. 2 fuel oil, based on a 3-hour test average at full load; after the first 12 months of operation, 20</p>

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ppmv at 15% oxygen on a dry basis, when firing natural gas and No. 2 fuel oil, based on a 3-hour test average at full load (also see A.2.g).

CO emissions from this emissions unit shall not exceed 301 lbs/hr at all operating loads, excluding start-up and shutdown periods when firing natural gas; 413 lbs/hr during start-up and shutdown periods when firing natural gas; 800 lbs/hr at all operating loads, when firing No. 2 fuel oil; and 724 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004, including periods of start-up and shutdown.

Sulfur dioxide (SO₂) emissions from this emissions unit shall not exceed 0.0026 lb/mmBtu actual heat input, when firing natural gas; 0.055 lb/mmBtu actual heat input, when firing No. 2 fuel oil; and 138.6 tons/year as a rolling, 12-month summation combined from units P001, P002, P003 and P004.

Sulfuric acid mist emissions from this emissions unit, during oil-firing only, shall not

exceed 0.0054 lb/mmBtu, actual heat input and 12.64 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004.

Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 31.64 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004.

Formaldehyde emissions from this emissions unit shall not exceed 5.92 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004.

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

VOC emissions from this emissions unit shall not exceed 4 lbs/hr when firing natural gas and 5.5 lbs/hr when firing No. 2 fuel oil.

Formaldehyde emissions from this emissions unit shall not exceed 0.000713 lb formaldehyde/mmBtu actual heat input.

The requirements of this rule also include compliance with the requirements of 40 CFR Part 52, Section 52.21 and OAC rules 3745-31-10 through 3745-31-20; OAC rule 3745-31-05 (C); and OAC rule 3745-17-07(A)(1).

See Part I, term A.4.

The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to 40 CFR Part 52, Sections 52.21 and OAC rules 3745-31-10 through 3745-31-20.

See A.I.2.d. below

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2. Additional Terms and Conditions

- 2.a** The listed particulate/PM10 emission limitations are more stringent than the requirements of OAC rule 3745-17-11(B)(4). They were chosen by the applicant

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to ensure compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20 and 40 CFR Part 52, Section 52.21 "Prevention of significant deterioration of air quality".

- 2.b** The listed nitrogen oxides emission limitations are more stringent than the requirements of 40 CFR Part 60, Subpart GG and OAC rule 3745-23-06. They were chosen by the applicant to ensure compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20 and 40 CFR Part 52, Section 52.21 "Prevention of significant deterioration of air quality".
- 2.c** The listed sulfur dioxide emission limitations are more stringent than the requirements of 40 CFR Part 60, Subpart GG and OAC rule 3745-18-06(F). They were chosen by the applicant to ensure compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20 and 40 CFR Part 52, Section 52.21 "Prevention of significant deterioration of air quality".
- 2.d** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology (BAT) and best available control technology (BACT) requirements established pursuant to this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally approved SIP for Ohio.

On February 15, 2005, OAC rule 3745-23-06 was rescinded; therefore, it is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally approved SIP for Ohio.

The listed NO_x and CO emission limitations were chosen by the applicant to ensure compliance with the requirements of OAC rules 3745-31-10 through

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3745-31-20 and 40 CFR Part 52, Section 52.21 "Prevention of significant deterioration of air quality".

- 2.e** The following Best Available Control Technology (BACT) determinations have been made in accordance with the PSD regulations:

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Particulate/PM10 Emissions - The BACT determination is the use of only clean burning fuels, natural gas and No. 2 fuel oil in these combustion turbines, capable of meeting the emission limitations listed in Part III A.I.1.

Nitrogen oxide emissions - The BACT determination is the use of dry low-NOx burners (DLNB) when firing natural gas and water injection when firing fuel oil and the ppmv NOx levels listed in Part III A.I.1.

Carbon monoxide emissions - The BACT determination is the use of efficient combustion technology inherent to the design of the combustion turbines and the ppmv CO levels listed in Part III A.I.1.

Sulfur dioxide emissions - The BACT determination is the use of natural gas as the primary fuel and No. 2 fuel oil as back-up fuel in these combustion turbines and a maximum sulfur content of 0.05 percent by weight of the fuel oil.

Sulfuric acid mist emissions - The BACT determination is the use of natural gas as the primary fuel and No. 2 fuel oil as the back-up fuel in these combustion turbines.

- 2.f** "Start-up" shall be defined as the time necessary to bring a turbine on line from a no-load condition to dry low NOx combustion mode during natural gas combustion, not to exceed thirty (30) minutes. Shutdown periods shall not exceed thirty (30) minutes.
- 2.g** If the permittee shows that the unit cannot consistently meet the CO ppm limitations, Ohio EPA will consider an application to modify the permit to install.
- 2.h** "Full load" shall be defined as all periods when the hourly average electrical output exceeds 72 MW.
- 2.i** Based on the evaluation of the PM10 emissions from this emissions unit, it was determined that the PM10 emissions did not trigger the Prevention of Significant Deterioration (PSD) permitting requirements. Therefore, the regulated pollutant for purposes of this permit is particulate emissions and compliance with the particulate emission limitation shall be determined in accordance with the U.S. EPA approved test methods for particulate emissions.
- 2.j** In lieu of monitoring the exhaust stack gas flowrate as required by 40 CFR Part 60, Appendix B - Performance Specification 6, the permittee shall use a certified NOx continuous emissions monitoring system in conjunction with a fuel flow

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monitor as described in 40 CFR Part 75, and certified CO continuous emissions monitoring system in conjunction with a fuel flow monitor (in a manner similar to that used for NOx) to meet these requirements. The relative accuracy requirements of Performance Specifications 6 shall apply to the NOx and CO continuous emissions monitoring systems.

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1. The maximum annual operating hours for emissions units P001, P002, P003 and P004 combined shall not exceed 10016 ** while burning natural gas and 4216 ** when burning No. 2 fuel oil, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004, the permittee shall not exceed the cumulative operating hours specified in the following table:

Month	Maximum allowable cumulative operating hours while burning natural gas	Maximum allowable cumulative operating hours while burning No. 2 fuel oil
1	2504 1056	
1 - 2	5008	2108
1 - 3	7512	3164
1 - 4	10016	4216
1 - 5	10016	4216
1 - 6	10016	4216
1 - 7	10016	4216
1 - 8	10016	4216
1 - 9	10016	4216
1 - 10	10016	4216
1 - 11	10016	4216
1 - 12	10016	4216

**The permittee may combust 1.2 additional hours of natural gas for every hour fuel oil is not combusted, up to 15020 hours annually of natural gas combustion.

After the first 12 calendar months of operation following the startup of any one of the emissions units P001 through P004, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

2. The sulfur content of the No. 2 fuel oil fired in this emissions unit shall not exceed 0.05% , by weight.
3. In order to establish federally enforceable limitations upon the potential to emit for CO, the permittee shall utilize the continuous CO monitoring system to demonstrate continuous compliance with the hourly and combined annual emission limitations established by this permit.

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4. The permittee shall burn only pipeline quality natural gas or number two fuel oil in this emissions unit.

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Issued: To be entered upon final issuance**III. Monitoring and/or Recordkeeping Requirements**

1. Statement of Certification - NOx Monitoring
 - a. Prior to the installation of the continuous NOx monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2 for approval by the Ohio EPA, Central Office.
 - b. Within 60 days of the startup of this emissions unit, the permittee shall conduct certification tests of the continuous NOx monitoring system pursuant to the applicable requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 2, and 40 CFR Part 75. Personnel from the Regional Air Pollution Control Agency shall be notified 30 days prior to the initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the Regional Air Pollution Control Agency within 30 days after the test is completed. Certification of the continuous NOx monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all the applicable requirements of ORC section 3704.03(I), 40 CFR Part 60, Appendix B, Performance Specification 2 and 40 CFR Part 75.
 - c. The permittee shall operate and maintain equipment to continuously monitor and record NOx emissions from this emissions unit in units of applicable standard(s). Such continuous monitoring and recording equipment shall comply with the applicable requirements specified in 40 CFR Part 60 and 40 CFR Part 75.
 - d. Each continuous monitoring system consists of all the equipment used to acquire and record data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.
 - e. The permittee shall maintain on-site documentation from the US EPA or the Ohio EPA that the continuous NOx monitoring system has been certified in accordance with the applicable requirements specified in 40 CFR Part 60 and Part 75. The letter of certification shall be made available to the Director upon request.
 - f. The permittee shall maintain records of the following data obtained by the continuous NOx monitoring system: emissions of NOx in ppmvd at 15% oxygen

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at full load on an hourly average basis, emissions of NO_x in lbs/hr, and results of daily zero/span calibration checks, results of quarterly cylinder gas audits, linearity check, or relative accuracy test audits, and magnitude of manual calibration adjustments.

- g. The permittee shall develop a written quality assurance/quality control plan for the continuous NO_x monitoring system designed to ensure continuous valid and representative readings of NO_x emissions in units of the applicable standard(s). The plan shall follow the applicable requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook documenting the activities related to the continuous NO_x monitoring system must be kept on site and available for inspection during regular office hours.
 - h. The permittee may conduct the relative accuracy test audits for the continuous nitrogen oxides monitoring system in accordance with the frequencies required for monitoring systems subject to 40 CFR Part 75, Appendix B; however, the permittee is still required to provide the audit results in units of the applicable standard(s), in accordance with 40 CFR Part 60. Cylinder gas audits may be conducted in accordance with the frequencies specified in 40 CFR Part 75, Appendix B for linearity checks. In addition, linearity checks conducted pursuant to 40 CFR Part 75, Appendix B, may be used in place of quarterly cylinder gas audits, as required in 40 CFR Part 60.
 - i. Whenever the monitoring system fails to meet the quality assurance or data validation requirements of 40 CFR Part 75, data shall be substituted using the applicable procedures in Subpart D, Appendix D, or Appendix E of 40 CFR Part 75.
2. Statement of Certification - CO Monitoring
- a. Prior to the installation of the continuous CO monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 4 for approval by the Ohio EPA, Central Office.
 - b. Within 60 days of the startup of this emissions unit, the permittee shall conduct certification tests of the continuous CO monitoring system pursuant to the applicable requirements of ORC section 3704.03(I), 40 CFR Part 60, Appendix

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B, Performance Specification 4. Personnel from the Regional Air Pollution Control Agency shall be notified 30 days prior to the initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the Regional Air Pollution Control Agency within 30 days after the test is completed. Certification of the continuous CO monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all the applicable requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 4 .

- c. The permittee shall operate and maintain equipment to continuously monitor and record CO emissions from this emissions units in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.
- d. Each continuous monitoring system consists of all the equipment used to acquire and record data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.
- e. The permittee shall maintain on-site documentation from the USEPA or the Ohio EPA that the continuous CO monitoring system has been certified in accordance with 40 CFR Part 60. The letter of certification shall be made available to the Director upon request.
- f. The permittee shall maintain records of the following data obtained by the continuous CO monitoring system: emissions of CO in lbs/hr, results of daily zero/span calibration checks, results of quarterly cylinder gas audits, linearity checks or relative accuracy test audits, and magnitude of manual calibration adjustments.
- g. The permittee shall develop a written quality assurance/quality control plan for the continuous CO monitoring system designed to ensure continuous valid and representative readings of CO emissions in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook documenting the activities related to the continuous CO monitoring system must be kept on site and available for inspection during regular office hours.
- h. The permittee may conduct the relative accuracy test audits for the continuous carbon monoxide monitoring system in accordance with the frequencies required for monitoring systems subject to 40 CFR Part 75, Appendix B; however, the permittee is still required to provide the audit results in units of the applicable standard(s), in accordance with 40 CFR Part 60. Cylinder gas audits may be conducted in accordance with the frequencies specified in 40 CFR Part 75, Appendix B for linearity checks. In addition, linearity checks conducted pursuant

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to 40 CFR Part 75, Appendix B, may be used in place of quarterly cylinder gas audits, as required in 40 CFR Part 60.

3. In accordance with 40 CFR Part 60, Subpart GG, Section 60.334(h)(1), the permittee shall monitor the sulfur content of the fuel being fired in the turbine except as provided in 40 CFR 60.334(h)(3). The frequency of determination of this value shall be in accordance with 40 CFR 60.334(i).
4. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or the oil supplier's analyses for sulfur content and heat content, and the calculated SO₂ emission rate (in lb/mmBtu).
5. Pursuant to 40 CFR 60.334(i)(1) or (3), the permittee shall determine fuel sulfur content in accordance with the requirements of 40 CFR 60.335(b)(10)(i) and 60.335(b)(10)(ii).
6. For each day during which the permittee burns a fuel other than pipeline quality natural gas or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
7. The permittee shall maintain monthly records of the following information:
 - a. The summation of the operating hours for this emissions unit, in hours/month, when burning natural gas and/or when burning No. 2 fuel oil. The summation of the operating hours for emissions units P001, P002, P003 and P004 combined when burning natural gas. The summation of the operating hours for emissions units P001, P002, P003 and P004 combined when burning fuel oil.
 - b. During the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004, the cumulative operating hours for each calendar month when burning natural gas and/or when burning No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined. Following the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004, the rolling, 12-month summation of the operating hours for this emissions unit, in hours per rolling, 12-month period when burning natural gas and/or when burning No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined.
 - c. The actual heat input of this emissions unit, in mmBtu/month, when burning natural gas and/or when burning No. 2 fuel oil.

- d. The rolling, 12-month summation of the particulate/PM10, NOx, CO, SO2, sulfuric acid mist, VOC, and formaldehyde emissions, in tons, for emissions units P001, P002, P003 and P004 combined. The monthly emissions shall be added to the total emissions from the previous 11 months to determine the rolling, 12-month summation of emissions.
 - e. The permittee shall monitor and record all periods of time when the unit is operated at "full load" conditions, based upon definition of full load in Section A.1.2.h.
 - f. The date, time and duration, in minutes of each start-up and shutdown. (The terms start-up and shutdown are defined in Section A.1.2.f.)
8. If the permittee uses 40 CFR Part 75 Appendix D to comply with the SO2 emissions limit, the permittee shall install, operate and maintain equipment to continuously monitor and record the actual fuel flow to this emissions unit when the emissions unit is in operation. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75. If the fuel flow monitoring and/or recording equipment is (are) not in service when the emissions unit is in operation, the permittee shall comply with the appropriate missing data procedures specified in 40 CFR Part 75.
 9. The permittee shall install, operate and maintain equipment to continuously monitor and record the percent oxygen in the stack serving this emissions unit when the emissions unit is in operation. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75. The monitoring and recording equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

IV. Reporting Requirements

1. Continuous NOx Emissions Monitoring
 - a. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting the date, commencement and completion time, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of NOx values in excess of the applicable emission limitations specified in the terms and conditions of this permit.
 - b. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting any continuous NOx monitoring system downtime while the emissions unit was on line (date, time, duration, and reason) along with any corrective action(s) taken.

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The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

- c. If there are no excess NO_x emissions during the calendar quarter, the permittee shall submit a statement to that effect along with date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

2. Continuous CO Emissions Monitoring

- a. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting the date, commencement and completion time, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of CO values in excess of the applicable hourly emission limitations specified in the terms and conditions of this permit (413 lbs/hr during start-up and shutdown periods, when burning natural gas, 301 lbs/hour, at all operating loads, excluding start-up and shutdown periods, when burning natural gas and 800 lbs/hour, at all operating loads, when burning No. 2 fuel oil).
- b. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting any continuous CO monitoring system downtime while the emissions unit was on line (date, time, duration, and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.
- c. If there are no CO excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and

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shall address the data obtained during the previous calendar quarter.

3. The permittee shall submit quarterly deviation (excursion) reports to the Regional Air Pollution Control Agency that identify any exceedances of the following:
 - a. For the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004 , all exceedances of the maximum allowable cumulative operating hour limits while burning natural gas and/or No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined.
 - b. Beginning after the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004 , the rolling, 12-month operating hour limitations while burning natural gas and/or No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined.
 - c. Any exceedances of the rolling, 12-month summation of particulate/PM10, NOx, CO, SO2, sulfuric acid mist, VOC, or formaldehyde emission limitations, in tons, for emissions units P001, P002, P003 and P004, combined.
 - d. Any exceedances of the NOx ppmv at 15% oxygen on a dry basis emission limitations at full load conditions.
 - e. The allowable duration for all start-up and shutdown periods.
 - f. For fuel oil, any exceedances of the 0.05% by weight sulfur content and the calculated SO2 emissions rate, in lb/mmBtu.
 - g. Any time during which the permittee burns a fuel other than pipeline quality natural gas or number two fuel oil.

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These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

4. The permittee shall submit quarterly reports which identify each period during which an exemption for ice-fog provided in 40 CFR Part 60.332(f) is in effect. The reports shall include the ambient conditions existing during the period, the date and time the air pollution control system was deactivated, and the date and time when the air pollution control system was reactivated. These reports shall be postmarked by April 30, July 30, October 30, and January 30 and each report shall cover the previous calendar quarter.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation -

0.013 lb (particulate emissions/PM10)/mmBtu actual heat input, when firing natural gas

0.026 lb particulate emissions/PM10)/mmBtu actual heat input, when firing No. 2 fuel oil

Applicable Compliance Method -

If required, compliance shall be based upon stack testing in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A and 40 CFR Part 51, Appendix M, Method 201 or 201A and 202, as specified in A.V.2.

- b. Emission Limitation -

46.12 tons/year particulate emissions/PM10 as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.6. and shall be determined through a summation of the particulate emissions/PM10 from the burning of natural gas and No. 2 fuel oil as follows:

- i. The monthly particulate emissions/PM10 from the burning of natural gas shall be determined by multiplying the average emissions in lb particulate/PM10 emissions/mmBtu while burning natural gas derived from the stack test conducted in accordance with A.V.2. by the actual heat input of this emissions unit for the month while burning natural gas, and dividing by 2,000 lbs/ton.

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- ii. The monthly particulate emissions/PM10 from the burning of No. 2 fuel oil shall be determined by multiplying the average emissions in lb particulate/PM10 emissions/mmBtu while burning No. 2 fuel oil derived from the stack test conducted in accordance with A.V.2. by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil, and dividing by 2,000 lbs/ton.
- iii. The combined rolling, 12-month summation of the particulate emissions/PM10 for emissions units P001, P002, P003 and P004 shall be the sum of (i) and (ii) above for each emissions unit for the rolling, 12-month period.

c. Emission Limitations -

15 ppmvd NOx at 15% oxygen, at full load, while burning natural gas, based on a 1-hour average as determined through data from the NOx CEMs
 42 ppmvd NOx at 15% oxygen, at full load, while burning No. 2 fuel oil, based on a 1-hour average as determined through data from the NOx CEMs

161 lbs/hour nitrogen oxides at all operating loads, while burning natural gas
 269 lbs/hour nitrogen oxides, at all operating loads, while burning No. 2 fuel oil
 Applicable Compliance Method -

Initial compliance with the allowable outlet concentration, and the lbs/hour NOx emission limitations shall be demonstrated by the performance testing as specified in A.V.2. and continual compliance shall be demonstrated by the use of the CEM specified in A.III.1. and the applicable 40 CFR Part 60 and 75 requirements. Emissions calculated using the 40 CFR Part 75 bias adjustment factor or using missing data procedures due to monitor downtime shall not be used to determine compliance with the hourly emission limitation.

d. Emission Limitation -

1373.32 tons/year NOx as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall

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be determined through the use of CEMs as specified in A.III.1.

The monthly NOx emissions shall be added to the total NOx emissions from the previous eleven months to determine the rolling, 12-month summation of NOx emissions.

e. Emission Limitations -

during the first 12 months of operation, 25 ppmvd CO at 15% oxygen as a 3-hr test average at full load, when firing natural gas and No. 2 fuel oil; after the first 12 months of operation, 20 ppmvd CO at 15% oxygen as a 3-hr test average at full load, when firing natural gas and No. 2 fuel oil

Applicable Compliance Method -

Compliance shall be determined through stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10, as specified in A.V.2.

Emission Limitations -

413 lbs CO/hour during start-up and shutdown periods, while burning natural gas

301 lbs CO/hour at all operating loads, excluding start-up and shutdown periods, while burning natural gas

800 lbs CO/hour at all operating loads, while burning No. 2 fuel oil

Applicable Compliance Method -

Compliance with the hourly emission limitations shall be based upon the data from the continuous CO emissions monitoring system requirement and the monitoring/record keeping as specified in A.III.2. Except for the start-up and shutdown emissions limit, compliance shall also be determined through stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10, as specified in A.V.2.

f. Emission Limitation -

724 tons/year CO, as a rolling, 12-month summation combined from units P001, P002, P003 and P004, including periods of start-up and shutdown

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined through the use of CEMs as specified in A.III.2. The monthly CO emissions shall be added to the total CO emissions from the previous eleven months to determine the rolling, 12-month summation of CO emissions.

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g. Emission Limitation -

0.0026 lb SO₂/mmBtu actual heat input, while burning natural gas
0.055 lb SO₂/mmBtu actual heat input, while burning No. 2 fuel oil

Applicable Compliance Method -

When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel. If required, the permittee shall perform or require the supplier to perform an analysis of the natural gas for sulfur content, in accordance with the appropriate ASTM method, or an equivalent method as approved by the Director, in order to demonstrate compliance with this emission limitation using the appropriate equation specified in AP-42 Table 3.1-2a (4/00). When firing number two fuel oil, compliance shall be based upon the fuel analysis and record keeping requirements specified in A.II.2. and A.III.4. and the use of the equations specified in OAC rule 3745-18-04(F).

h. Emission Limitation -

138.6 tons/year SO₂ as a rolling, 12-month summation combined from units P001, P002, P003 and P004

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined through a summation of the SO₂ emissions from the burning of natural gas and No. 2 fuel oil as follows:

- i. The monthly SO₂ emissions from the burning of natural gas shall be determined by multiplying the USEPA default value for pipeline quality natural gas (0.0006 lb SO₂/mmBtu) by the actual heat input of this emissions unit for the month while burning natural gas, and dividing by 2,000 lbs/ton.
- ii. The monthly SO₂ emissions from the burning of No. 2 fuel oil shall be determined by multiplying the average calculated SO₂ emission rate (determined as an arithmetic average of the calculated SO₂ emission rates for the shipments received each month in A.III.4. (lb/mmBtu)) by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil, and dividing by 2,000 lbs/ton.

- iii. The combined rolling, 12-month summation of the SO₂ emissions for emissions units P001, P002, P003 and P004 shall be the sum of (i) and (ii) above for each emissions unit for the rolling, 12-month period.
- i. Emission Limitation -

0.0054 lb sulfuric acid mist/mmBtu actual heat input

Applicable Compliance Method -

Compliance shall be based upon stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 8 as specified in A.V.2.
- j. Emission Limitation -

12.64 tons/year sulfuric acid mist, as a rolling, 12-month summation combined from units P001, P002, P003 and P004

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined by multiplying the average emissions in lb sulfuric acid mist/mmBtu derived from the stack test conducted in accordance with A.V.2. by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil, and dividing by 2,000 lbs/ton. The monthly sulfuric acid mist emissions for each emissions units P001, P002, P003 and P004 shall be summed and added to the total sulfuric acid mist emissions from the previous eleven months to determine the combined rolling, 12-month summation of sulfuric acid mist emissions for emissions units P001, P002, P003 and P004.
- k. Emission Limitation -

4 lbs/hour VOC, while burning natural gas
5.5 lbs/hour VOC, while burning No. 2 fuel oil

Applicable Compliance Method -

Compliance shall be based upon stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A, as specified in A.V.2.
- l. Emission Limitation -

31.64 tons/year VOC, as a rolling, 12-month summation combined from units P001, P002, P003 and P004

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Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined through a summation of the VOC emissions from the burning of natural gas and No. 2 fuel oil as follows:

- i. The monthly VOC emissions from the burning of natural gas shall be determined by multiplying the average emissions in lb VOC/hour while burning natural gas derived from the stack test conducted in accordance with A.V.2. by the operating hours for the month while burning natural gas, and dividing by 2,000 lbs/ton.
- ii. The monthly VOC emissions from the burning of No. 2 fuel oil shall be determined by multiplying the average emissions in lb VOC/hour while burning No. 2 fuel oil derived from the stack test conducted in accordance with A.V.2. by the operating hours for the month while burning No. 2 fuel oil, and dividing by 2,000 lbs/ton.
- iii. The combined rolling, 12-month summation of the VOC emissions for emissions units P001, P002, P003 and P004 shall be the sum of (i) and (ii) above for each emissions unit, for the rolling, 12-month period.

m. Emission Limitation -

0.000713 lb formaldehyde/mmBtu actual heat input

Applicable Compliance Method -

When firing natural gas, compliance shall be based upon stack testing in accordance with USEPA Method SW846, as specified in A.V.2. When firing No. 2 fuel oil, compliance shall be based upon the AP-42 Table 3.1-4 (4/00) emission factor of 0.00028 lb formaldehyde/mmBtu.

n. Emission Limitation -

5.92 tons/year formaldehyde, as a rolling, 12-month summation combined from units P001, P002, P003 and P004

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined through a summation of the formaldehyde emissions from the burning of natural gas and No. 2 fuel oil as follows:

- i. The monthly formaldehyde emissions from the burning of natural gas shall be determined by multiplying the average emissions in lb

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- formaldehyde/mmBtu while burning natural gas derived from the stack test conducted in accordance with A.V.2. by the actual heat input of this emissions unit for the month while burning natural gas, divided by 2,000 lbs/ton.
- ii. The monthly formaldehyde emissions from the burning of No.2 fuel oil shall be determined by multiplying the AP-42 Table 3.1-4 (4/00) of 0.00028 lb formaldehyde/mmBtu while burning No. 2 fuel oil by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil , divided by 2,000 lbs/ton.
 - iii. The combined rolling, 12-month summation of the formaldehyde emissions for emissions units P001, P002, P003 and P004 shall be the sum of (i) and (ii) above for each emissions unit for the rolling, 12-month period.
- o. Emission Limitation -
20% opacity, as a six-minute average

Applicable Compliance Method -

Compliance shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

p. Emission Limitation -

0.05% sulfur, by weight, of the No. 2 fuel oil

Applicable Compliance Method -

Compliance shall be based upon fuel oil sampling as specified in A.III.3, A.III.4, and A.III.5.

q. Emission Limitation -

10,016 hours of operation, as a rolling, 12-month summation while burning natural gas

4,216 hours of operation, as a rolling, 12-month summation while burning No. 2 fuel oil

1.2 hours of operation of natural gas may be added for every hour No. 2 fuel oil is not burned, with total natural gas operation not to exceed 15,020 hours as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 60 days after start-up of this emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the particulates/PM10, NOx, CO, VOC, formaldehyde (while burning natural gas), and sulfuric acid mist (while burning No. 2 fuel oil) emission rates.
- c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for particulates/PM10, Methods 1 through 5 of 40 CFR Part 60, Appendix A and 40 CFR Part 51, Appendix M, Method 201 or 201A and 202 ; for NOx, Methods 1 through 4 and 7 or 7E of 40 CFR Part 60, Appendix A; for CO, Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix

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A; for VOC, Methods 1 through 4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A; for formaldehyde, Method SW846; for sulfuric acid mist, Methods 1 through 4 and 8 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from RAPCA.

** the permittee has requested that if the average emission rate (lbs/hour) derived from the stack test conducted in accordance with this terms is less than the permit VOC allowable listed in term A.I.1., it may apply for an air permit to install modification to increase the hours of operation. The permittee realizes that this modification might trigger the requirement to secure either an administrative or a new air permit to install.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Regional Air Pollution Control Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Regional Air Pollution Control Agency's refusal to accept the results of the emission test(s).

Personnel from the Regional Air Pollution Control Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Regional Air Pollution Control Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Regional Air Pollution Control Agency.

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002 - natural gas and No. 2 fuel oil fired simple cycle stationary combustion turbine No. 5 - Tait CT5, with a nominal production rating of 80 MW and a nominal heat input of 1115.2 mmBtu/hour, with dry low NOx combustion and water injection controls	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- 1. The permit to install for this emissions unit (P001) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: formaldehyde

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TLV (mg/m3): 0.37

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.6971

MAGLC (ug/m3): 8.81

Pollutant: beryllium

TLV (mg/m3): 0.002

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.0008

MAGLC (ug/m3): 0.05

Pollutant: arsenic

TLV (mg/m3): 0.01

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.0123

MAGLC (ug/m3): 0.24

Pollutant: benzene

TLV (mg/m3): 1.60

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.2142

MAGLC (ug/m3): 38.10

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Pollutant: sulfuric acid mist

TLV (mg/m3): 1.00

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Maximum Hourly Emission Rate (lbs/hr): 1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 13.56

MAGLC (ug/m³): 23.81

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the

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"Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P003 - natural gas and No. 2 fuel oil fired simple cycle stationary combustion turbine No. 6 - Tait CT6, with a nominal production rating of 80 MW and a nominal heat input of 1115.2 mmBtu/hour, with dry low NOx combustion and water injection controls	40 CFR Part 52, Section 52.21 and OAC rule 3745-31-10 through OAC rule 3745-31-20

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		<p style="text-align: center;"><u>Applicable Emissions Limitations/Control Measures</u></p>
<p>OAC rule 3745-31-05 (C) Synthetic minor to avoid PSD rule requirements</p>	<p>40 CFR Part 75</p>	<p>Particulate/PM10 emissions from this emissions unit shall not exceed 0.013 lb/mmBtu actual heat input when firing natural gas; 0.026 lb/mmBtu actual heat input when firing No. 2 fuel oil, and 46.12 TPY as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004.</p>
<p>OAC rule 3745-31-05 (C) Synthetic minor to avoid MACT rule requirements</p>	<p>OAC rule 3745-17-11(B)(4) OAC rule 3745-18-06(F) 40 CFR Part 60, Subpart GG</p>	<p>Nitrogen oxides (NO_x) emissions from this emissions unit shall not exceed 15 ppmv at 15% oxygen on a dry basis at full load, when firing natural gas, based on a one-hour average as determined through data from the NO_x continuous emission monitoring system (CEMs); 161 lbs/hr at all operating loads when firing natural gas; 42 ppmv at 15% oxygen on a dry basis at full load, when firing No.2 fuel oil, based on a one-hour average as determined through data from the NO_x CEMs; 269 lbs/hr at all operating loads when firing No. 2 fuel oil; and 1373.32 TPY as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004.</p>
<p>OAC rule 3745-17-07(A)(1)</p>	<p>OAC rules 3745-21-08 (B) and 3745-23-06 (B)</p>	<p>Carbon monoxide (CO) emissions from this emissions unit shall not exceed,</p>
<p>OAC rule 3745-31-05(A)(3)</p>		<p>during the first 12 months of operation, 25 ppmv at 15% oxygen on a dry basis, when firing natural gas and No. 2 fuel oil, based on a 3-hour test average at full load; after the first 12 months of operation, 20</p>

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ppmv at 15% oxygen on a dry basis, when firing natural gas and No. 2 fuel oil, based on a 3-hour test average at full load (also see A.2.g).

CO emissions from this emissions unit shall not exceed 301 lbs/hr at all operating loads, excluding start-up and shutdown periods when firing natural gas; 413 lbs/hr during start-up and shutdown periods when firing natural gas; 800 lbs/hr at all operating loads, when firing No. 2 fuel oil; and 724 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004, including periods of start-up and shutdown.

Sulfur dioxide (SO₂) emissions from this emissions unit shall not exceed 0.0026 lb/mmBtu actual heat input, when firing natural gas; 0.055 lb/mmBtu actual heat input, when firing No. 2 fuel oil; and 138.6 tons/year as a rolling, 12-month summation combined from units P001, P002, P003 and P004.

Sulfuric acid mist emissions from this emissions unit, during oil-firing only, shall not exceed 0.0054 lb/mmBtu, actual heat input and 12.64 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004.

Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 31.64 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004.

Formaldehyde emissions from this emissions unit shall not exceed 5.92 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004.

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

VOC emissions from this emissions unit shall not exceed 4 lbs/hr when firing natural gas and 5.5 lbs/hr when firing No. 2 fuel oil.

Formaldehyde emissions from this emissions unit shall not exceed 0.000713 lb formaldehyde/mmBtu actual heat input.

The requirements of this rule also include compliance with the requirements of 40 CFR Part 52, Section 52.21 and OAC rules 3745-31-10 through 3745-31-20; OAC rule 3745-31-05 (C); and OAC rule 3745-17-07(A)(1).

See Part I, term A.4.

The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to 40 CFR Part 52, Sections 52.21 and OAC rules 3745-31-10 through 3745-31-20.

See A.I.2.d. below

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2. Additional Terms and Conditions

- 2.a** The listed particulate/PM10 emission limitations are more stringent than the requirements of OAC rule 3745-17-11(B)(4). They were chosen by the applicant

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to ensure compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20 and 40 CFR Part 52, Section 52.21 "Prevention of significant deterioration of air quality".

- 2.b** The listed nitrogen oxides emission limitations are more stringent than the requirements of 40 CFR Part 60, Subpart GG and OAC rule 3745-23-06. They were chosen by the applicant to ensure compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20 and 40 CFR Part 52, Section 52.21 "Prevention of significant deterioration of air quality".
- 2.c** The listed sulfur dioxide emission limitations are more stringent than the requirements of 40 CFR Part 60, Subpart GG and OAC rule 3745-18-06(F). They were chosen by the applicant to ensure compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20 and 40 CFR Part 52, Section 52.21 "Prevention of significant deterioration of air quality".
- 2.d** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology (BAT) and best available control technology (BACT) requirements established pursuant to this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally approved SIP for Ohio.

On February 15, 2005, OAC rule 3745-23-06 was rescinded; therefore, it is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally approved SIP for Ohio.

The listed NOx and CO emission limitations were chosen by the applicant to ensure compliance with the requirements of OAC rules 3745-31-10 through

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3745-31-20 and 40 CFR Part 52, Section 52.21 "Prevention of significant deterioration of air quality".

- 2.e** The following Best Available Control Technology (BACT) determinations have been made in accordance with the PSD regulations:

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Particulate/PM10 Emissions - The BACT determination is the use of only clean burning fuels, natural gas and No. 2 fuel oil in these combustion turbines, capable of meeting the emission limitations listed in Part III A.I.1.

Nitrogen oxide emissions - The BACT determination is the use of dry low-NOx burners (DLNB) when firing natural gas and water injection when firing fuel oil and the ppmv NOx levels listed in Part III A.I.1.

Carbon monoxide emissions - The BACT determination is the use of efficient combustion technology inherent to the design of the combustion turbines and the ppmv CO levels listed in Part III A.I.1.

Sulfur dioxide emissions - The BACT determination is the use of natural gas as the primary fuel and No. 2 fuel oil as back-up fuel in these combustion turbines and a maximum sulfur content of 0.05 percent by weight of the fuel oil.

Sulfuric acid mist emissions - The BACT determination is the use of natural gas as the primary fuel and No. 2 fuel oil as the back-up fuel in these combustion turbines.

- 2.f** "Start-up" shall be defined as the time necessary to bring a turbine on line from a no-load condition to dry low NOx combustion mode during natural gas combustion, not to exceed thirty (30) minutes. Shutdown periods shall not exceed thirty (30) minutes.
- 2.g** If the permittee shows that the unit cannot consistently meet the CO ppm limitations, Ohio EPA will consider an application to modify the permit to install.
- 2.h** "Full load" shall be defined as all periods when the hourly average electrical output exceeds 72 MW.
- 2.i** Based on the evaluation of the PM10 emissions from this emissions unit, it was determined that the PM10 emissions did not trigger the Prevention of Significant Deterioration (PSD) permitting requirements. Therefore, the regulated pollutant for purposes of this permit is particulate emissions and compliance with the particulate emission limitation shall be determined in accordance with the U.S. EPA approved test methods for particulate emissions.
- 2.j** In lieu of monitoring the exhaust stack gas flowrate as required by 40 CFR Part 60, Appendix B - Performance Specification 6, the permittee shall use a certified NOx continuous emissions monitoring system in conjunction with a fuel flow

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monitor as described in 40 CFR Part 75, and certified CO continuous emissions monitoring system in conjunction with a fuel flow monitor (in a manner similar to that used for NO_x) to meet these requirements. The relative accuracy requirements of Performance Specifications 6 shall apply to the NO_x and CO continuous emissions monitoring systems.

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Issued: To be entered upon final issuance**II. Operational Restrictions**

1. The maximum annual operating hours for emissions units P001, P002, P003 and P004 combined shall not exceed 10016 ** while burning natural gas and 4216 ** when burning No. 2 fuel oil, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004, the permittee shall not exceed the cumulative operating hours specified in the following table:

Month while burning natural gas	Maximum allowable cumulative operating hours	Maximum allowable cumulative operating hours while burning No. 2 fuel oil
1	2504 1056	
1 - 2	5008	2108
1 - 3	7512	3164
1 - 4	10016	4216
1 - 5	10016	4216
1 - 6	10016	4216
1 - 7	10016	4216
1 - 8	10016	4216
1 - 9	10016	4216
1 - 10	10016	4216
1 - 11	10016	4216
1 - 12	10016	4216

**The permittee may combust 1.2 additional hours of natural gas for every hour fuel oil is not combusted, up to 15020 hours annually of natural gas combustion.

After the first 12 calendar months of operation following the startup of any one of the emissions units P001 through P004, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

2. The sulfur content of the No. 2 fuel oil fired in this emissions unit shall not exceed 0.05% , by weight.
3. In order to establish federally enforceable limitations upon the potential to emit for CO, the permittee shall utilize the continuous CO monitoring system to demonstrate continuous compliance with the hourly and combined annual emission limitations established by this permit.

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4. The permittee shall burn only pipeline quality natural gas or number two fuel oil in this emissions unit.

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Issued: To be entered upon final issuance**III. Monitoring and/or Recordkeeping Requirements**

1. Statement of Certification - NOx Monitoring
 - a. Prior to the installation of the continuous NOx monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2 for approval by the Ohio EPA, Central Office.
 - b. Within 60 days of the startup of this emissions unit, the permittee shall conduct certification tests of the continuous NOx monitoring system pursuant to the applicable requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 2, and 40 CFR Part 75. Personnel from the Regional Air Pollution Control Agency shall be notified 30 days prior to the initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the Regional Air Pollution Control Agency within 30 days after the test is completed. Certification of the continuous NOx monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all the applicable requirements of ORC section 3704.03(I), 40 CFR Part 60, Appendix B, Performance Specification 2 and 40 CFR Part 75.
 - c. The permittee shall operate and maintain equipment to continuously monitor and record NOx emissions from this emissions unit in units of applicable standard(s). Such continuous monitoring and recording equipment shall comply with the applicable requirements specified in 40 CFR Part 60 and 40 CFR Part 75.
 - d. Each continuous monitoring system consists of all the equipment used to acquire and record data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.
 - e. The permittee shall maintain on-site documentation from the US EPA or the Ohio EPA that the continuous NOx monitoring system has been certified in accordance with the applicable requirements specified in 40 CFR Part 60 and Part 75. The letter of certification shall be made available to the Director upon request.
 - f. The permittee shall maintain records of the following data obtained by the continuous NOx monitoring system: emissions of NOx in ppmvd at 15% oxygen

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at full load on an hourly average basis, emissions of NO_x in lbs/hr, and results of daily zero/span calibration checks, results of quarterly cylinder gas audits, linearity check, or relative accuracy test audits, and magnitude of manual calibration adjustments.

- g. The permittee shall develop a written quality assurance/quality control plan for the continuous NO_x monitoring system designed to ensure continuous valid and representative readings of NO_x emissions in units of the applicable standard(s). The plan shall follow the applicable requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook documenting the activities related to the continuous NO_x monitoring system must be kept on site and available for inspection during regular office hours.
 - h. The permittee may conduct the relative accuracy test audits for the continuous nitrogen oxides monitoring system in accordance with the frequencies required for monitoring systems subject to 40 CFR Part 75, Appendix B; however, the permittee is still required to provide the audit results in units of the applicable standard(s), in accordance with 40 CFR Part 60. Cylinder gas audits may be conducted in accordance with the frequencies specified in 40 CFR Part 75, Appendix B for linearity checks. In addition, linearity checks conducted pursuant to 40 CFR Part 75, Appendix B, may be used in place of quarterly cylinder gas audits, as required in 40 CFR Part 60.
 - i. Whenever the monitoring system fails to meet the quality assurance or data validation requirements of 40 CFR Part 75, data shall be substituted using the applicable procedures in Subpart D, Appendix D, or Appendix E of 40 CFR Part 75.
2. Statement of Certification - CO Monitoring
- a. Prior to the installation of the continuous CO monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 4 for approval by the Ohio EPA, Central Office.
 - b. Within 60 days of the startup of this emissions unit, the permittee shall conduct certification tests of the continuous CO monitoring system pursuant to the applicable requirements of ORC section 3704.03(I), 40 CFR Part 60, Appendix

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B, Performance Specification 4. Personnel from the Regional Air Pollution Control Agency shall be notified 30 days prior to the initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the Regional Air Pollution Control Agency within 30 days after the test is completed. Certification of the continuous CO monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all the applicable requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 4 .

- c. The permittee shall operate and maintain equipment to continuously monitor and record CO emissions from this emissions units in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.
- d. Each continuous monitoring system consists of all the equipment used to acquire and record data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.
- e. The permittee shall maintain on-site documentation from the USEPA or the Ohio EPA that the continuous CO monitoring system has been certified in accordance with 40 CFR Part 60. The letter of certification shall be made available to the Director upon request.
- f. The permittee shall maintain records of the following data obtained by the continuous CO monitoring system: emissions of CO in lbs/hr, results of daily zero/span calibration checks, results of quarterly cylinder gas audits, linearity checks or relative accuracy test audits, and magnitude of manual calibration adjustments.
- g. The permittee shall develop a written quality assurance/quality control plan for the continuous CO monitoring system designed to ensure continuous valid and representative readings of CO emissions in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook documenting the activities related to the continuous CO monitoring system must be kept on site and available for inspection during regular office hours.
- h. The permittee may conduct the relative accuracy test audits for the continuous carbon monoxide monitoring system in accordance with the frequencies required for monitoring systems subject to 40 CFR Part 75, Appendix B; however, the permittee is still required to provide the audit results in units of the applicable standard(s), in accordance with 40 CFR Part 60. Cylinder gas audits may be conducted in accordance with the frequencies specified in 40 CFR Part 75, Appendix B for linearity checks. In addition, linearity checks conducted pursuant

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to 40 CFR Part 75, Appendix B, may be used in place of quarterly cylinder gas audits, as required in 40 CFR Part 60.

3. In accordance with 40 CFR Part 60, Subpart GG, Section 60.334(h)(1), the permittee shall monitor the sulfur content of the fuel being fired in the turbine except as provided in 40 CFR 60.334(h)(3). The frequency of determination of this value shall be in accordance with 40 CFR 60.334(i).
4. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or the oil supplier's analyses for sulfur content and heat content, and the calculated SO₂ emission rate (in lb/mmBtu).
5. Pursuant to 40 CFR 60.334(i)(1) or (3), the permittee shall determine fuel sulfur content in accordance with the requirements of 40 CFR 60.335(b)(10)(i) and 60.335(b)(10)(ii).
6. For each day during which the permittee burns a fuel other than pipeline quality natural gas or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
7. The permittee shall maintain monthly records of the following information:
 - a. The summation of the operating hours for this emissions unit, in hours/month, when burning natural gas and/or when burning No. 2 fuel oil. The summation of the operating hours for emissions units P001, P002, P003 and P004 combined when burning natural gas. The summation of the operating hours for emissions units P001, P002, P003 and P004 combined when burning fuel oil.
 - b. During the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004, the cumulative operating hours for each calendar month when burning natural gas and/or when burning No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined. Following the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004, the rolling, 12-month summation of the operating hours for this emissions unit, in hours per rolling, 12-month period when burning natural gas and/or when burning No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined.
 - c. The actual heat input of this emissions unit, in mmBtu/month, when burning natural gas and/or when burning No. 2 fuel oil.

- d. The rolling, 12-month summation of the particulate/PM10, NOx, CO, SO2, sulfuric acid mist, VOC, and formaldehyde emissions, in tons, for emissions units P001, P002, P003 and P004 combined. The monthly emissions shall be added to the total emissions from the previous 11 months to determine the rolling, 12-month summation of emissions.
 - e. The permittee shall monitor and record all periods of time when the unit is operated at "full load" conditions, based upon definition of full load in Section A.1.2.h.
 - f. The date, time and duration, in minutes of each start-up and shutdown. (The terms start-up and shutdown are defined in Section A.1.2.f.)
8. If the permittee uses 40 CFR Part 75 Appendix D to comply with the SO2 emissions limit, the permittee shall install, operate and maintain equipment to continuously monitor and record the actual fuel flow to this emissions unit when the emissions unit is in operation. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75. If the fuel flow monitoring and/or recording equipment is (are) not in service when the emissions unit is in operation, the permittee shall comply with the appropriate missing data procedures specified in 40 CFR Part 75.
 9. The permittee shall install, operate and maintain equipment to continuously monitor and record the percent oxygen in the stack serving this emissions unit when the emissions unit is in operation. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75. The monitoring and recording equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

IV. Reporting Requirements

1. Continuous NOx Emissions Monitoring
 - a. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting the date, commencement and completion time, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of NOx values in excess of the applicable emission limitations specified in the terms and conditions of this permit.
 - b. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting any continuous NOx monitoring system downtime while the emissions unit was on line (date, time, duration, and reason) along with any corrective action(s) taken.

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The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

- c. If there are no excess NO_x emissions during the calendar quarter, the permittee shall submit a statement to that effect along with date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

2. Continuous CO Emissions Monitoring

- a. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting the date, commencement and completion time, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of CO values in excess of the applicable hourly emission limitations specified in the terms and conditions of this permit (413 lbs/hr during start-up and shutdown periods, when burning natural gas, 301 lbs/hour, at all operating loads, excluding start-up and shutdown periods, when burning natural gas and 800 lbs/hour, at all operating loads, when burning No. 2 fuel oil).
- b. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting any continuous CO monitoring system downtime while the emissions unit was on line (date, time, duration, and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.
- c. If there are no CO excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and

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shall address the data obtained during the previous calendar quarter.

3. The permittee shall submit quarterly deviation (excursion) reports to the Regional Air Pollution Control Agency that identify any exceedances of the following:
 - a. For the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004 , all exceedances of the maximum allowable cumulative operating hour limits while burning natural gas and/or No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined.
 - b. Beginning after the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004 , the rolling, 12-month operating hour limitations while burning natural gas and/or No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined.
 - c. Any exceedances of the rolling, 12-month summation of particulate/PM10, NOx, CO, SO2, sulfuric acid mist, VOC, or formaldehyde emission limitations, in tons, for emissions units P001, P002, P003 and P004, combined.
 - d. Any exceedances of the NOx ppmv at 15% oxygen on a dry basis emission limitations at full load conditions.
 - e. The allowable duration for all start-up and shutdown periods.
 - f. For fuel oil, any exceedances of the 0.05% by weight sulfur content and the calculated SO2 emissions rate, in lb/mmBtu.
 - g. Any time during which the permittee burns a fuel other than pipeline quality natural gas or number two fuel oil.

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These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

4. The permittee shall submit quarterly reports which identify each period during which an exemption for ice-fog provided in 40 CFR Part 60.332(f) is in effect. The reports shall include the ambient conditions existing during the period, the date and time the air pollution control system was deactivated, and the date and time when the air pollution control system was reactivated. These reports shall be postmarked by April 30, July 30, October 30, and January 30 and each report shall cover the previous calendar quarter.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation -

0.013 lb (particulate emissions/PM10)/mmBtu actual heat input, when firing natural gas

0.026 lb particulate emissions/PM10)/mmBtu actual heat input, when firing No. 2 fuel oil

Applicable Compliance Method -

If required, compliance shall be based upon stack testing in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A and 40 CFR Part 51, Appendix M, Method 201 or 201A and 202, as specified in A.V.2.

- b. Emission Limitation -

46.12 tons/year particulate emissions/PM10 as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.6. and shall be determined through a summation of the particulate emissions/PM10 from the burning of natural gas and No. 2 fuel oil as follows:

- i. The monthly particulate emissions/PM10 from the burning of natural gas shall be determined by multiplying the average emissions in lb particulate/PM10 emissions/mmBtu while burning natural gas derived from the stack test conducted in accordance with A.V.2. by the actual heat input of this emissions unit for the month while burning natural gas, and dividing by 2,000 lbs/ton.

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- ii. The monthly particulate emissions/PM10 from the burning of No. 2 fuel oil shall be determined by multiplying the average emissions in lb particulate/PM10 emissions/mmBtu while burning No. 2 fuel oil derived from the stack test conducted in accordance with A.V.2. by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil, and dividing by 2,000 lbs/ton.
- iii. The combined rolling, 12-month summation of the particulate emissions/PM10 for emissions units P001, P002, P003 and P004 shall be the sum of (i) and (ii) above for each emissions unit for the rolling, 12-month period.

c. Emission Limitations -

15 ppmvd NOx at 15% oxygen, at full load, while burning natural gas, based on a 1-hour average as determined through data from the NOx CEMs
 42 ppmvd NOx at 15% oxygen, at full load, while burning No. 2 fuel oil, based on a 1-hour average as determined through data from the NOx CEMs

161 lbs/hour nitrogen oxides at all operating loads, while burning natural gas
 269 lbs/hour nitrogen oxides, at all operating loads, while burning No. 2 fuel oil
 Applicable Compliance Method -

Initial compliance with the allowable outlet concentration, and the lbs/hour NOx emission limitations shall be demonstrated by the performance testing as specified in A.V.2. and continual compliance shall be demonstrated by the use of the CEM specified in A.III.1. and the applicable 40 CFR Part 60 and 75 requirements. Emissions calculated using the 40 CFR Part 75 bias adjustment factor or using missing data procedures due to monitor downtime shall not be used to determine compliance with the hourly emission limitation.

d. Emission Limitation -

1373.32 tons/year NOx as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall

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be determined through the use of CEMs as specified in A.III.1.

The monthly NOx emissions shall be added to the total NOx emissions from the previous eleven months to determine the rolling, 12-month summation of NOx emissions.

e. Emission Limitations -

during the first 12 months of operation, 25 ppmvd CO at 15% oxygen as a 3-hr test average at full load, when firing natural gas and No. 2 fuel oil; after the first 12 months of operation, 20 ppmvd CO at 15% oxygen as a 3-hr test average at full load, when firing natural gas and No. 2 fuel oil

Applicable Compliance Method -

Compliance shall be determined through stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10, as specified in A.V.2.

Emission Limitations -

413 lbs CO/hour during start-up and shutdown periods, while burning natural gas

301 lbs CO/hour at all operating loads, excluding start-up and shutdown periods, while burning natural gas

800 lbs CO/hour at all operating loads, while burning No. 2 fuel oil

Applicable Compliance Method -

Compliance with the hourly emission limitations shall be based upon the data from the continuous CO emissions monitoring system requirement and the monitoring/record keeping as specified in A.III.2. Except for the start-up and shutdown emissions limit, compliance shall also be determined through stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10, as specified in A.V.2.

f. Emission Limitation -

724 tons/year CO, as a rolling, 12-month summation combined from units P001, P002, P003 and P004, including periods of start-up and shutdown

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined through the use of CEMs as specified in A.III.2. The monthly CO emissions shall be added to the total CO emissions from the previous eleven months to determine the rolling, 12-month summation of CO emissions.

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g. Emission Limitation -

0.0026 lb SO₂/mmBtu actual heat input, while burning natural gas
0.055 lb SO₂/mmBtu actual heat input, while burning No. 2 fuel oil

Applicable Compliance Method -

When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel. If required, the permittee shall perform or require the supplier to perform an analysis of the natural gas for sulfur content, in accordance with the appropriate ASTM method, or an equivalent method as approved by the Director, in order to demonstrate compliance with this emission limitation using the appropriate equation specified in AP-42 Table 3.1-2a (4/00). When firing number two fuel oil, compliance shall be based upon the fuel analysis and record keeping requirements specified in A.II.2. and A.III.4. and the use of the equations specified in OAC rule 3745-18-04(F).

h. Emission Limitation -

138.6 tons/year SO₂ as a rolling, 12-month summation combined from units P001, P002, P003 and P004

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined through a summation of the SO₂ emissions from the burning of natural gas and No. 2 fuel oil as follows:

- i. The monthly SO₂ emissions from the burning of natural gas shall be determined by multiplying the USEPA default value for pipeline quality natural gas (0.0006 lb SO₂/mmBtu) by the actual heat input of this emissions unit for the month while burning natural gas, and dividing by 2,000 lbs/ton.
- ii. The monthly SO₂ emissions from the burning of No. 2 fuel oil shall be determined by multiplying the average calculated SO₂ emission rate (determined as an arithmetic average of the calculated SO₂ emission rates for the shipments received each month in A.III.4. (lb/mmBtu)) by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil, and dividing by 2,000 lbs/ton.

- iii. The combined rolling, 12-month summation of the SO₂ emissions for emissions units P001, P002, P003 and P004 shall be the sum of (i) and (ii) above for each emissions unit for the rolling, 12-month period.
- i. Emission Limitation -
- 0.0054 lb sulfuric acid mist/mmBtu actual heat input
- Applicable Compliance Method -
- Compliance shall be based upon stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 8 as specified in A.V.2.
- j. Emission Limitation -
- 12.64 tons/year sulfuric acid mist, as a rolling, 12-month summation combined from units P001, P002, P003 and P004
- Applicable Compliance Method -
- Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined by multiplying the average emissions in lb sulfuric acid mist/mmBtu derived from the stack test conducted in accordance with A.V.2. by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil, and dividing by 2,000 lbs/ton. The monthly sulfuric acid mist emissions for each emissions units P001, P002, P003 and P004 shall be summed and added to the total sulfuric acid mist emissions from the previous eleven months to determine the combined rolling, 12-month summation of sulfuric acid mist emissions for emissions units P001, P002, P003 and P004.
- k. Emission Limitation -
- 4 lbs/hour VOC, while burning natural gas
5.5 lbs/hour VOC, while burning No. 2 fuel oil
- Applicable Compliance Method -
- Compliance shall be based upon stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A, as specified in A.V.2.
- l. Emission Limitation -
- 31.64 tons/year VOC, as a rolling, 12-month summation combined from units P001, P002, P003 and P004

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Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined through a summation of the VOC emissions from the burning of natural gas and No. 2 fuel oil as follows:

- i. The monthly VOC emissions from the burning of natural gas shall be determined by multiplying the average emissions in lb VOC/hour while burning natural gas derived from the stack test conducted in accordance with A.V.2. by the operating hours for the month while burning natural gas, and dividing by 2,000 lbs/ton.
- ii. The monthly VOC emissions from the burning of No. 2 fuel oil shall be determined by multiplying the average emissions in lb VOC/hour while burning No. 2 fuel oil derived from the stack test conducted in accordance with A.V.2. by the operating hours for the month while burning No. 2 fuel oil, and dividing by 2,000 lbs/ton.
- iii. The combined rolling, 12-month summation of the VOC emissions for emissions units P001, P002, P003 and P004 shall be the sum of (i) and (ii) above for each emissions unit, for the rolling, 12-month period.

m. Emission Limitation -

0.000713 lb formaldehyde/mmBtu actual heat input

Applicable Compliance Method -

When firing natural gas, compliance shall be based upon stack testing in accordance with USEPA Method SW846, as specified in A.V.2. When firing No. 2 fuel oil, compliance shall be based upon the AP-42 Table 3.1-4 (4/00) emission factor of 0.00028 lb formaldehyde/mmBtu.

n. Emission Limitation -

5.92 tons/year formaldehyde, as a rolling, 12-month summation combined from units P001, P002, P003 and P004

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined through a summation of the formaldehyde emissions from the burning of natural gas and No. 2 fuel oil as follows:

- i. The monthly formaldehyde emissions from the burning of natural gas shall be determined by multiplying the average emissions in lb

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formaldehyde/mmBtu while burning natural gas derived from the stack test conducted in accordance with A.V.2. by the actual heat input of this emissions unit for the month while burning natural gas, divided by 2,000 lbs/ton.

- ii. The monthly formaldehyde emissions from the burning of No.2 fuel oil shall be determined by multiplying the AP-42 Table 3.1-4 (4/00) of 0.00028 lb formaldehyde/mmBtu while burning No. 2 fuel oil by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil , divided by 2,000 lbs/ton.
- iii. The combined rolling, 12-month summation of the formaldehyde emissions for emissions units P001, P002, P003 and P004 shall be the sum of (i) and (ii) above for each emissions unit for the rolling, 12-month period.

o. Emission Limitation -

20% opacity, as a six-minute average

Applicable Compliance Method -

Compliance shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

p. Emission Limitation -

0.05% sulfur, by weight, of the No. 2 fuel oil

Applicable Compliance Method -

Compliance shall be based upon fuel oil sampling as specified in A.III.3, A.III.4, and A.III.5.

q. Emission Limitation -

10,016 hours of operation, as a rolling, 12-month summation while burning natural gas

4,216 hours of operation, as a rolling, 12-month summation while burning No. 2 fuel oil

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1.2 hours of operation of natural gas may be added for every hour No. 2 fuel oil is not burned, with total natural gas operation not to exceed 15,020 hours as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 60 days after start-up of this emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the particulates/PM10, NOx, CO, VOC, formaldehyde (while burning natural gas), and sulfuric acid mist (while burning No. 2 fuel oil) emission rates.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for particulates/PM10, Methods 1 through 5 of 40 CFR Part 60, Appendix A and 40 CFR Part 51, Appendix M, Method 201 or 201A and 202 ; for NOx, Methods 1 through 4 and 7 or 7E of 40 CFR Part 60, Appendix A; for CO, Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A; for VOC, Methods 1 through 4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A; for formaldehyde, Method SW846; for sulfuric acid mist, Methods 1 through 4 and 8 of 40 CFR Part 60, Appendix A . Alternative U.S. EPA approved test methods may be used with prior approval from RAPCA.

** the permittee has requested that if the average emission rate (lbs/hour) derived from the stack test conducted in accordance with this terms is less than the permit VOC allowable listed in term A.I.1., it may apply for an air permit to install modification to increase the hours of operation. The permittee realizes that this modification might trigger the requirement to secure either an administrative or a new air permit to install.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Regional Air Pollution Control Agency . The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Regional Air Pollution Control Agency's refusal to accept the results of the emission test(s).

Personnel from the Regional Air Pollution Control Agency shall be permitted to witness

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the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Regional Air Pollution Control Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Regional Air Pollution Control Agency .

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P003 - natural gas and No. 2 fuel oil fired simple cycle stationary combustion turbine No. 6 - Tait CT6, with a nominal production rating of 80 MW and a nominal heat input of 1115.2 mmBtu/hour, with dry low NOx combustion and water injection controls	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

1. The permit to install for this emissions unit (P001) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: formaldehyde

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TLV (mg/m3): 0.37

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.6971

MAGLC (ug/m3): 8.81

Pollutant: beryllium

TLV (mg/m3): 0.002

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.0008

MAGLC (ug/m3): 0.05

Pollutant: arsenic

TLV (mg/m3): 0.01

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.0123

MAGLC (ug/m3): 0.24

Pollutant: benzene

TLV (mg/m3): 1.60

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.2142

MAGLC (ug/m3): 38.10

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Pollutant: sulfuric acid mist

TLV (mg/m3): 1.00

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Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 13.56

MAGLC (ug/m3): 23.81

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the

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- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P004 - natural gas and No. 2 fuel oil fired simple cycle stationary combustion turbine No. 7 - Tait CT7, with a nominal production rating of 80 MW and a nominal heat input of 1115.2 mmBtu/hour, with dry low NOx combustion and water injection controls	40 CFR Part 52, Section 52.21 and OAC rule 3745-31-10 through OAC rule 3745-31-20

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		<p style="text-align: center;"><u>Applicable Emissions Limitations/Control Measures</u></p>
<p>OAC rule 3745-31-05 (C) Synthetic minor to avoid PSD rule requirements</p>	<p>40 CFR Part 75</p>	<p>Particulate/PM10 emissions from this emissions unit shall not exceed 0.013 lb/mmBtu actual heat input when firing natural gas; 0.026 lb/mmBtu actual heat input when firing No. 2 fuel oil, and 46.12 TPY as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004.</p>
<p>OAC rule 3745-31-05 (C) Synthetic minor to avoid MACT rule requirements</p>	<p>OAC rule 3745-17-11(B)(4) OAC rule 3745-18-06(F) 40 CFR Part 60, Subpart GG</p>	<p>Nitrogen oxides (NO_x) emissions from this emissions unit shall not exceed 15 ppmv at 15% oxygen on a dry basis at full load, when firing natural gas, based on a one-hour average as determined through data from the NO_x continuous emission monitoring system (CEMs); 161 lbs/hr at all operating loads when firing natural gas; 42 ppmv at 15% oxygen on a dry basis at full load, when firing No.2 fuel oil, based on a one-hour average as determined through data from the NO_x CEMs; 269 lbs/hr at all operating loads when firing No. 2 fuel oil; and 1373.32 TPY as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004.</p>
<p>OAC rule 3745-17-07(A)(1)</p>	<p>OAC rules 3745-21-08 (B) and 3745-23-06 (B)</p>	<p>Carbon monoxide (CO) emissions from this emissions unit shall not exceed,</p>
<p>OAC rule 3745-31-05(A)(3)</p>		<p>during the first 12 months of operation, 25 ppmv at 15% oxygen on a dry basis, when firing natural gas and No. 2 fuel oil, based on a 3-hour test average at full load; after the first 12 months of operation, 20</p>

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ppmv at 15% oxygen on a dry basis, when firing natural gas and No. 2 fuel oil, based on a 3-hour test average at full load (also see A.2.g).

CO emissions from this emissions unit shall not exceed 301 lbs/hr at all operating loads, excluding start-up and shutdown periods when firing natural gas; 413 lbs/hr during start-up and shutdown periods when firing natural gas; 800 lbs/hr at all operating loads, when firing No. 2 fuel oil; and 724 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004, including periods of start-up and shutdown.

Sulfur dioxide (SO₂) emissions from this emissions unit shall not exceed 0.0026 lb/mmBtu actual heat input, when firing natural gas; 0.055 lb/mmBtu actual heat input, when firing No. 2 fuel oil; and 138.6 tons/year as a rolling, 12-month summation combined from units P001, P002, P003 and P004.

Sulfuric acid mist emissions from this emissions unit, during oil-firing only, shall not exceed 0.0054 lb/mmBtu, actual heat input and 12.64 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004.

Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 31.64 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004.

Formaldehyde emissions from this emissions unit shall not exceed 5.92 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004.

Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

VOC emissions from this emissions unit shall not exceed 4 lbs/hr when firing natural gas and 5.5 lbs/hr when firing No. 2 fuel oil.

Formaldehyde emissions from this emissions unit shall not exceed 0.000713 lb formaldehyde/mmBtu actual heat input.

The requirements of this rule also include compliance with the requirements of 40 CFR Part 52, Section 52.21 and OAC rules 3745-31-10 through 3745-31-20; OAC rule 3745-31-05 (C); and OAC rule 3745-17-07(A)(1).

See Part I, term A.4.

The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to 40 CFR Part 52, Sections 52.21 and OAC rules 3745-31-10 through 3745-31-20.

See A.I.2.d. below

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2. Additional Terms and Conditions

- 2.a** The listed particulate/PM10 emission limitations are more stringent than the requirements of OAC rule 3745-17-11(B)(4). They were chosen by the applicant

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to ensure compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20 and 40 CFR Part 52, Section 52.21 "Prevention of significant deterioration of air quality".

- 2.b** The listed nitrogen oxides emission limitations are more stringent than the requirements of 40 CFR Part 60, Subpart GG and OAC rule 3745-23-06. They were chosen by the applicant to ensure compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20 and 40 CFR Part 52, Section 52.21 "Prevention of significant deterioration of air quality".
- 2.c** The listed sulfur dioxide emission limitations are more stringent than the requirements of 40 CFR Part 60, Subpart GG and OAC rule 3745-18-06(F). They were chosen by the applicant to ensure compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20 and 40 CFR Part 52, Section 52.21 "Prevention of significant deterioration of air quality".
- 2.d** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology (BAT) and best available control technology (BACT) requirements established pursuant to this permit to install.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally approved SIP for Ohio.

On February 15, 2005, OAC rule 3745-23-06 was rescinded; therefore, it is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-23-06, the requirement to satisfy the "latest available control techniques and operating practices" still exists as part of the federally approved SIP for Ohio.

The listed NOx and CO emission limitations were chosen by the applicant to ensure compliance with the requirements of OAC rules 3745-31-10 through

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3745-31-20 and 40 CFR Part 52, Section 52.21 "Prevention of significant deterioration of air quality".

- 2.e** The following Best Available Control Technology (BACT) determinations have been made in accordance with the PSD regulations:

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Particulate/PM10 Emissions - The BACT determination is the use of only clean burning fuels, natural gas and No. 2 fuel oil in these combustion turbines, capable of meeting the emission limitations listed in Part III A.I.1.

Nitrogen oxide emissions - The BACT determination is the use of dry low-NOx burners (DLNB) when firing natural gas and water injection when firing fuel oil and the ppmv NOx levels listed in Part III A.I.1.

Carbon monoxide emissions - The BACT determination is the use of efficient combustion technology inherent to the design of the combustion turbines and the ppmv CO levels listed in Part III A.I.1.

Sulfur dioxide emissions - The BACT determination is the use of natural gas as the primary fuel and No. 2 fuel oil as back-up fuel in these combustion turbines and a maximum sulfur content of 0.05 percent by weight of the fuel oil.

Sulfuric acid mist emissions - The BACT determination is the use of natural gas as the primary fuel and No. 2 fuel oil as the back-up fuel in these combustion turbines.

- 2.f** "Start-up" shall be defined as the time necessary to bring a turbine on line from a no-load condition to dry low NOx combustion mode during natural gas combustion, not to exceed thirty (30) minutes. Shutdown periods shall not exceed thirty (30) minutes.
- 2.g** If the permittee shows that the unit cannot consistently meet the CO ppm limitations, Ohio EPA will consider an application to modify the permit to install.
- 2.h** "Full load" shall be defined as all periods when the hourly average electrical output exceeds 72 MW.
- 2.i** Based on the evaluation of the PM10 emissions from this emissions unit, it was determined that the PM10 emissions did not trigger the Prevention of Significant Deterioration (PSD) permitting requirements. Therefore, the regulated pollutant for purposes of this permit is particulate emissions and compliance with the particulate emission limitation shall be determined in accordance with the U.S. EPA approved test methods for particulate emissions.
- 2.j** In lieu of monitoring the exhaust stack gas flowrate as required by 40 CFR Part 60, Appendix B - Performance Specification 6, the permittee shall use a certified NOx continuous emissions monitoring system in conjunction with a fuel flow

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monitor as described in 40 CFR Part 75, and certified CO continuous emissions monitoring system in conjunction with a fuel flow monitor (in a manner similar to that used for NOx) to meet these requirements. The relative accuracy requirements of Performance Specifications 6 shall apply to the NOx and CO continuous emissions monitoring systems.

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II. Operational Restrictions

1. The maximum annual operating hours for emissions units P001, P002, P003 and P004 combined shall not exceed 10016 ** while burning natural gas and 4216 ** when burning No. 2 fuel oil, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004, the permittee shall not exceed the cumulative operating hours specified in the following table:

Month while burning natural gas	Maximum allowable cumulative operating hours	Maximum allowable cumulative operating hours while burning No. 2 fuel oil
1	2504 1056	
1 - 2	5008	2108
1 - 3	7512	3164
1 - 4	10016	4216
1 - 5	10016	4216
1 - 6	10016	4216
1 - 7	10016	4216
1 - 8	10016	4216
1 - 9	10016	4216
1 - 10	10016	4216
1 - 11	10016	4216
1 - 12	10016	4216

**The permittee may combust 1.2 additional hours of natural gas for every hour fuel oil is not combusted, up to 15020 hours annually of natural gas combustion.

After the first 12 calendar months of operation following the startup of any one of the emissions units P001 through P004, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

2. The sulfur content of the No. 2 fuel oil fired in this emissions unit shall not exceed 0.05% , by weight.
3. In order to establish federally enforceable limitations upon the potential to emit for CO, the permittee shall utilize the continuous CO monitoring system to demonstrate continuous compliance with the hourly and combined annual emission limitations established by this permit.

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4. The permittee shall burn only pipeline quality natural gas or number two fuel oil in this emissions unit.

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Issued: To be entered upon final issuance**III. Monitoring and/or Recordkeeping Requirements**

1. Statement of Certification - NOx Monitoring
 - a. Prior to the installation of the continuous NOx monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2 for approval by the Ohio EPA, Central Office.
 - b. Within 60 days of the startup of this emissions unit, the permittee shall conduct certification tests of the continuous NOx monitoring system pursuant to the applicable requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 2, and 40 CFR Part 75. Personnel from the Regional Air Pollution Control Agency shall be notified 30 days prior to the initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the Regional Air Pollution Control Agency within 30 days after the test is completed. Certification of the continuous NOx monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all the applicable requirements of ORC section 3704.03(I), 40 CFR Part 60, Appendix B, Performance Specification 2 and 40 CFR Part 75.
 - c. The permittee shall operate and maintain equipment to continuously monitor and record NOx emissions from this emissions unit in units of applicable standard(s). Such continuous monitoring and recording equipment shall comply with the applicable requirements specified in 40 CFR Part 60 and 40 CFR Part 75.
 - d. Each continuous monitoring system consists of all the equipment used to acquire and record data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.
 - e. The permittee shall maintain on-site documentation from the US EPA or the Ohio EPA that the continuous NOx monitoring system has been certified in accordance with the applicable requirements specified in 40 CFR Part 60 and Part 75. The letter of certification shall be made available to the Director upon request.
 - f. The permittee shall maintain records of the following data obtained by the continuous NOx monitoring system: emissions of NOx in ppmvd at 15% oxygen

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at full load on an hourly average basis, emissions of NO_x in lbs/hr, and results of daily zero/span calibration checks, results of quarterly cylinder gas audits, linearity check, or relative accuracy test audits, and magnitude of manual calibration adjustments.

- g. The permittee shall develop a written quality assurance/quality control plan for the continuous NO_x monitoring system designed to ensure continuous valid and representative readings of NO_x emissions in units of the applicable standard(s). The plan shall follow the applicable requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook documenting the activities related to the continuous NO_x monitoring system must be kept on site and available for inspection during regular office hours.
 - h. The permittee may conduct the relative accuracy test audits for the continuous nitrogen oxides monitoring system in accordance with the frequencies required for monitoring systems subject to 40 CFR Part 75, Appendix B; however, the permittee is still required to provide the audit results in units of the applicable standard(s), in accordance with 40 CFR Part 60. Cylinder gas audits may be conducted in accordance with the frequencies specified in 40 CFR Part 75, Appendix B for linearity checks. In addition, linearity checks conducted pursuant to 40 CFR Part 75, Appendix B, may be used in place of quarterly cylinder gas audits, as required in 40 CFR Part 60.
 - i. Whenever the monitoring system fails to meet the quality assurance or data validation requirements of 40 CFR Part 75, data shall be substituted using the applicable procedures in Subpart D, Appendix D, or Appendix E of 40 CFR Part 75.
2. Statement of Certification - CO Monitoring
- a. Prior to the installation of the continuous CO monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 4 for approval by the Ohio EPA, Central Office.
 - b. Within 60 days of the startup of this emissions unit, the permittee shall conduct certification tests of the continuous CO monitoring system pursuant to the applicable requirements of ORC section 3704.03(I), 40 CFR Part 60, Appendix

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B, Performance Specification 4. Personnel from the Regional Air Pollution Control Agency shall be notified 30 days prior to the initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the Regional Air Pollution Control Agency within 30 days after the test is completed. Certification of the continuous CO monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all the applicable requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 4 .

- c. The permittee shall operate and maintain equipment to continuously monitor and record CO emissions from this emissions units in units of the applicable standard(s). Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.
- d. Each continuous monitoring system consists of all the equipment used to acquire and record data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.
- e. The permittee shall maintain on-site documentation from the USEPA or the Ohio EPA that the continuous CO monitoring system has been certified in accordance with 40 CFR Part 60. The letter of certification shall be made available to the Director upon request.
- f. The permittee shall maintain records of the following data obtained by the continuous CO monitoring system: emissions of CO in lbs/hr, results of daily zero/span calibration checks, results of quarterly cylinder gas audits, linearity checks or relative accuracy test audits, and magnitude of manual calibration adjustments.
- g. The permittee shall develop a written quality assurance/quality control plan for the continuous CO monitoring system designed to ensure continuous valid and representative readings of CO emissions in units of the applicable standard(s). The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook documenting the activities related to the continuous CO monitoring system must be kept on site and available for inspection during regular office hours.
- h. The permittee may conduct the relative accuracy test audits for the continuous carbon monoxide monitoring system in accordance with the frequencies required for monitoring systems subject to 40 CFR Part 75, Appendix B; however, the permittee is still required to provide the audit results in units of the applicable standard(s), in accordance with 40 CFR Part 60. Cylinder gas audits may be conducted in accordance with the frequencies specified in 40 CFR Part 75, Appendix B for linearity checks. In addition, linearity checks conducted pursuant

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to 40 CFR Part 75, Appendix B, may be used in place of quarterly cylinder gas audits, as required in 40 CFR Part 60.

3. In accordance with 40 CFR Part 60, Subpart GG, Section 60.334(h)(1), the permittee shall monitor the sulfur content of the fuel being fired in the turbine except as provided in 40 CFR 60.334(h)(3). The frequency of determination of this value shall be in accordance with 40 CFR 60.334(i).
4. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or the oil supplier's analyses for sulfur content and heat content, and the calculated SO₂ emission rate (in lb/mmBtu).
5. Pursuant to 40 CFR 60.334(i)(1) or (3), the permittee shall determine fuel sulfur content in accordance with the requirements of 40 CFR 60.335(b)(10)(i) and 60.335(b)(10)(ii).
6. For each day during which the permittee burns a fuel other than pipeline quality natural gas or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
7. The permittee shall maintain monthly records of the following information:
 - a. The summation of the operating hours for this emissions unit, in hours/month, when burning natural gas and/or when burning No. 2 fuel oil. The summation of the operating hours for emissions units P001, P002, P003 and P004 combined when burning natural gas. The summation of the operating hours for emissions units P001, P002, P003 and P004 combined when burning fuel oil.
 - b. During the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004, the cumulative operating hours for each calendar month when burning natural gas and/or when burning No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined. Following the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004, the rolling, 12-month summation of the operating hours for this emissions unit, in hours per rolling, 12-month period when burning natural gas and/or when burning No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined.
 - c. The actual heat input of this emissions unit, in mmBtu/month, when burning natural gas and/or when burning No. 2 fuel oil.

- d. The rolling, 12-month summation of the particulate/PM10, NOx, CO, SO2, sulfuric acid mist, VOC, and formaldehyde emissions, in tons, for emissions units P001, P002, P003 and P004 combined. The monthly emissions shall be added to the total emissions from the previous 11 months to determine the rolling, 12-month summation of emissions.
 - e. The permittee shall monitor and record all periods of time when the unit is operated at "full load" conditions, based upon definition of full load in Section A.1.2.h.
 - f. The date, time and duration, in minutes of each start-up and shutdown. (The terms start-up and shutdown are defined in Section A.1.2.f.)
8. If the permittee uses 40 CFR Part 75 Appendix D to comply with the SO2 emissions limit, the permittee shall install, operate and maintain equipment to continuously monitor and record the actual fuel flow to this emissions unit when the emissions unit is in operation. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75. If the fuel flow monitoring and/or recording equipment is (are) not in service when the emissions unit is in operation, the permittee shall comply with the appropriate missing data procedures specified in 40 CFR Part 75.
 9. The permittee shall install, operate and maintain equipment to continuously monitor and record the percent oxygen in the stack serving this emissions unit when the emissions unit is in operation. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75. The monitoring and recording equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

IV. Reporting Requirements

1. Continuous NOx Emissions Monitoring
 - a. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting the date, commencement and completion time, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of NOx values in excess of the applicable emission limitations specified in the terms and conditions of this permit.
 - b. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting any continuous NOx monitoring system downtime while the emissions unit was on line (date, time, duration, and reason) along with any corrective action(s) taken.

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The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

- c. If there are no excess NO_x emissions during the calendar quarter, the permittee shall submit a statement to that effect along with date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

2. Continuous CO Emissions Monitoring

- a. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting the date, commencement and completion time, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of CO values in excess of the applicable hourly emission limitations specified in the terms and conditions of this permit (413 lbs/hr during start-up and shutdown periods, when burning natural gas, 301 lbs/hour, at all operating loads, excluding start-up and shutdown periods, when burning natural gas and 800 lbs/hour, at all operating loads, when burning No. 2 fuel oil).
- b. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting any continuous CO monitoring system downtime while the emissions unit was on line (date, time, duration, and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.
- c. If there are no CO excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and

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shall address the data obtained during the previous calendar quarter.

3. The permittee shall submit quarterly deviation (excursion) reports to the Regional Air Pollution Control Agency that identify any exceedances of the following:
 - a. For the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004 , all exceedances of the maximum allowable cumulative operating hour limits while burning natural gas and/or No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined.
 - b. Beginning after the first twelve calendar months of operation following startup of any one of the emissions units P001 through P004 , the rolling, 12-month operating hour limitations while burning natural gas and/or No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined.
 - c. Any exceedances of the rolling, 12-month summation of particulate/PM10, NOx, CO, SO2, sulfuric acid mist, VOC, or formaldehyde emission limitations, in tons, for emissions units P001, P002, P003 and P004, combined.
 - d. Any exceedances of the NOx ppmv at 15% oxygen on a dry basis emission limitations at full load conditions.
 - e. The allowable duration for all start-up and shutdown periods.
 - f. For fuel oil, any exceedances of the 0.05% by weight sulfur content and the calculated SO2 emissions rate, in lb/mmBtu.
 - g. Any time during which the permittee burns a fuel other than pipeline quality natural gas or number two fuel oil.

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These reports shall be submitted in accordance with Section A.1. of the General Terms and Conditions of this permit.

4. The permittee shall submit quarterly reports which identify each period during which an exemption for ice-fog provided in 40 CFR Part 60.332(f) is in effect. The reports shall include the ambient conditions existing during the period, the date and time the air pollution control system was deactivated, and the date and time when the air pollution control system was reactivated. These reports shall be postmarked by April 30, July 30, October 30, and January 30 and each report shall cover the previous calendar quarter.

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section A.I. of these terms and conditions shall be determined in accordance with the following method(s):

- a. Emission Limitation -

0.013 lb (particulate emissions/PM10)/mmBtu actual heat input, when firing natural gas

0.026 lb particulate emissions/PM10)/mmBtu actual heat input, when firing No. 2 fuel oil

Applicable Compliance Method -

If required, compliance shall be based upon stack testing in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A and 40 CFR Part 51, Appendix M, Method 201 or 201A and 202, as specified in A.V.2.

- b. Emission Limitation -

46.12 tons/year particulate emissions/PM10 as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.6. and shall be determined through a summation of the particulate emissions/PM10 from the burning of natural gas and No. 2 fuel oil as follows:

- i. The monthly particulate emissions/PM10 from the burning of natural gas shall be determined by multiplying the average emissions in lb particulate/PM10 emissions/mmBtu while burning natural gas derived from the stack test conducted in accordance with A.V.2. by the actual heat input of this emissions unit for the month while burning natural gas, and dividing by 2,000 lbs/ton.

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- ii. The monthly particulate emissions/PM10 from the burning of No. 2 fuel oil shall be determined by multiplying the average emissions in lb particulate/PM10 emissions/mmBtu while burning No. 2 fuel oil derived from the stack test conducted in accordance with A.V.2. by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil, and dividing by 2,000 lbs/ton.
 - iii. The combined rolling, 12-month summation of the particulate emissions/PM10 for emissions units P001, P002, P003 and P004 shall be the sum of (i) and (ii) above for each emissions unit for the rolling, 12-month period.
- c. Emission Limitations -
- 15 ppmvd NOx at 15% oxygen, at full load, while burning natural gas, based on a 1-hour average as determined through data from the NOx CEMs
42 ppmvd NOx at 15% oxygen, at full load, while burning No. 2 fuel oil, based on a 1-hour average as determined through data from the NOx CEMs
- 161 lbs/hour nitrogen oxides at all operating loads, while burning natural gas
269 lbs/hour nitrogen oxides, at all operating loads, while burning No. 2 fuel oil
Applicable Compliance Method -
- Initial compliance with the allowable outlet concentration, and the lbs/hour NOx emission limitations shall be demonstrated by the performance testing as specified in A.V.2. and continual compliance shall be demonstrated by the use of the CEM specified in A.III.1. and the applicable 40 CFR Part 60 and 75 requirements. Emissions calculated using the 40 CFR Part 75 bias adjustment factor or using missing data procedures due to monitor downtime shall not be used to determine compliance with the hourly emission limitation.
- d. Emission Limitation -
- 1373.32 tons/year NOx as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004
- Applicable Compliance Method -
- Compliance shall be based upon record keeping as specified in A.III.7. and shall

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be determined through the use of CEMs as specified in A.III.1.

The monthly NOx emissions shall be added to the total NOx emissions from the previous eleven months to determine the rolling, 12-month summation of NOx emissions.

e. Emission Limitations -

during the first 12 months of operation, 25 ppmvd CO at 15% oxygen as a 3-hr test average at full load, when firing natural gas and No. 2 fuel oil; after the first 12 months of operation, 20 ppmvd CO at 15% oxygen as a 3-hr test average at full load, when firing natural gas and No. 2 fuel oil

Applicable Compliance Method -

Compliance shall be determined through stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10, as specified in A.V.2.

Emission Limitations -

413 lbs CO/hour during start-up and shutdown periods, while burning natural gas

301 lbs CO/hour at all operating loads, excluding start-up and shutdown periods, while burning natural gas

800 lbs CO/hour at all operating loads, while burning No. 2 fuel oil

Applicable Compliance Method -

Compliance with the hourly emission limitations shall be based upon the data from the continuous CO emissions monitoring system requirement and the monitoring/record keeping as specified in A.III.2. Except for the start-up and shutdown emissions limit, compliance shall also be determined through stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10, as specified in A.V.2.

f. Emission Limitation -

724 tons/year CO, as a rolling, 12-month summation combined from units P001, P002, P003 and P004, including periods of start-up and shutdown

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined through the use of CEMs as specified in A.III.2. The monthly CO emissions shall be added to the total CO emissions from the previous eleven months to determine the rolling, 12-month summation of CO emissions.

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g. Emission Limitation -

0.0026 lb SO₂/mmBtu actual heat input, while burning natural gas
0.055 lb SO₂/mmBtu actual heat input, while burning No. 2 fuel oil

Applicable Compliance Method -

When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel. If required, the permittee shall perform or require the supplier to perform an analysis of the natural gas for sulfur content, in accordance with the appropriate ASTM method, or an equivalent method as approved by the Director, in order to demonstrate compliance with this emission limitation using the appropriate equation specified in AP-42 Table 3.1-2a (4/00). When firing number two fuel oil, compliance shall be based upon the fuel analysis and record keeping requirements specified in A.II.2. and A.III.4. and the use of the equations specified in OAC rule 3745-18-04(F).

h. Emission Limitation -

138.6 tons/year SO₂ as a rolling, 12-month summation combined from units P001, P002, P003 and P004

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined through a summation of the SO₂ emissions from the burning of natural gas and No. 2 fuel oil as follows:

- i. The monthly SO₂ emissions from the burning of natural gas shall be determined by multiplying the USEPA default value for pipeline quality natural gas (0.0006 lb SO₂/mmBtu) by the actual heat input of this emissions unit for the month while burning natural gas, and dividing by 2,000 lbs/ton.
- ii. The monthly SO₂ emissions from the burning of No. 2 fuel oil shall be determined by multiplying the average calculated SO₂ emission rate (determined as an arithmetic average of the calculated SO₂ emission rates for the shipments received each month in A.III.4. (lb/mmBtu)) by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil, and dividing by 2,000 lbs/ton.

- iii. The combined rolling, 12-month summation of the SO₂ emissions for emissions units P001, P002, P003 and P004 shall be the sum of (i) and (ii) above for each emissions unit for the rolling, 12-month period.
- i. Emission Limitation -

0.0054 lb sulfuric acid mist/mmBtu actual heat input

Applicable Compliance Method -

Compliance shall be based upon stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 8 as specified in A.V.2.
- j. Emission Limitation -

12.64 tons/year sulfuric acid mist, as a rolling, 12-month summation combined from units P001, P002, P003 and P004

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined by multiplying the average emissions in lb sulfuric acid mist/mmBtu derived from the stack test conducted in accordance with A.V.2. by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil, and dividing by 2,000 lbs/ton. The monthly sulfuric acid mist emissions for each emissions units P001, P002, P003 and P004 shall be summed and added to the total sulfuric acid mist emissions from the previous eleven months to determine the combined rolling, 12-month summation of sulfuric acid mist emissions for emissions units P001, P002, P003 and P004.
- k. Emission Limitation -

4 lbs/hour VOC, while burning natural gas
5.5 lbs/hour VOC, while burning No. 2 fuel oil

Applicable Compliance Method -

Compliance shall be based upon stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A, as specified in A.V.2.
- l. Emission Limitation -

31.64 tons/year VOC, as a rolling, 12-month summation combined from units P001, P002, P003 and P004

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Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined through a summation of the VOC emissions from the burning of natural gas and No. 2 fuel oil as follows:

- i. The monthly VOC emissions from the burning of natural gas shall be determined by multiplying the average emissions in lb VOC/hour while burning natural gas derived from the stack test conducted in accordance with A.V.2. by the operating hours for the month while burning natural gas, and dividing by 2,000 lbs/ton.
- ii. The monthly VOC emissions from the burning of No. 2 fuel oil shall be determined by multiplying the average emissions in lb VOC/hour while burning No. 2 fuel oil derived from the stack test conducted in accordance with A.V.2. by the operating hours for the month while burning No. 2 fuel oil, and dividing by 2,000 lbs/ton.
- iii. The combined rolling, 12-month summation of the VOC emissions for emissions units P001, P002, P003 and P004 shall be the sum of (i) and (ii) above for each emissions unit, for the rolling, 12-month period.

m. Emission Limitation -

0.000713 lb formaldehyde/mmBtu actual heat input

Applicable Compliance Method -

When firing natural gas, compliance shall be based upon stack testing in accordance with USEPA Method SW846, as specified in A.V.2. When firing No. 2 fuel oil, compliance shall be based upon the AP-42 Table 3.1-4 (4/00) emission factor of 0.00028 lb formaldehyde/mmBtu.

n. Emission Limitation -

5.92 tons/year formaldehyde, as a rolling, 12-month summation combined from units P001, P002, P003 and P004

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7. and shall be determined through a summation of the formaldehyde emissions from the burning of natural gas and No. 2 fuel oil as follows:

- i. The monthly formaldehyde emissions from the burning of natural gas shall be determined by multiplying the average emissions in lb

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formaldehyde/mmBtu while burning natural gas derived from the stack test conducted in accordance with A.V.2. by the actual heat input of this emissions unit for the month while burning natural gas, divided by 2,000 lbs/ton.

- ii. The monthly formaldehyde emissions from the burning of No.2 fuel oil shall be determined by multiplying the AP-42 Table 3.1-4 (4/00) of 0.00028 lb formaldehyde/mmBtu while burning No. 2 fuel oil by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil , divided by 2,000 lbs/ton.
- iii. The combined rolling, 12-month summation of the formaldehyde emissions for emissions units P001, P002, P003 and P004 shall be the sum of (i) and (ii) above for each emissions unit for the rolling, 12-month period.

o. Emission Limitation -

20% opacity, as a six-minute average

Applicable Compliance Method -

Compliance shall be determined through visible emission observations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

p. Emission Limitation -

0.05% sulfur, by weight, of the No. 2 fuel oil

Applicable Compliance Method -

Compliance shall be based upon fuel oil sampling as specified in A.III.3, A.III.4, and A.III.5.

q. Emission Limitation -

10,016 hours of operation, as a rolling, 12-month summation while burning natural gas

4,216 hours of operation, as a rolling, 12-month summation while burning No. 2 fuel oil

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1.2 hours of operation of natural gas may be added for every hour No. 2 fuel oil is not burned, with total natural gas operation not to exceed 15,020 hours as a rolling, 12-month summation.

Applicable Compliance Method -

Compliance shall be based upon record keeping as specified in A.III.7.

2. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 60 days after start-up of this emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the particulates/PM10, NOx, CO, VOC, formaldehyde (while burning natural gas), and sulfuric acid mist (while burning No. 2 fuel oil) emission rates.
 - c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for particulates/PM10, Methods 1 through 5 of 40 CFR Part 60, Appendix A and 40 CFR Part 51, Appendix M, Method 201 or 201A and 202 ; for NOx, Methods 1 through 4 and 7 or 7E of 40 CFR Part 60, Appendix A; for CO, Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A; for VOC, Methods 1 through 4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A; for formaldehyde, Method SW846; for sulfuric acid mist, Methods 1 through 4 and 8 of 40 CFR Part 60, Appendix A . Alternative U.S. EPA approved test methods may be used with prior approval from RAPCA.

** the permittee has requested that if the average emission rate (lbs/hour) derived from the stack test conducted in accordance with this terms is less than the permit VOC allowable listed in term A.I.1., it may apply for an air permit to install modification to increase the hours of operation. The permittee realizes that this modification might trigger the requirement to secure either an administrative or a new air permit to install.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Regional Air Pollution Control Agency . The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Regional Air Pollution Control Agency's refusal to accept the results of the emission test(s).

Personnel from the Regional Air Pollution Control Agency shall be permitted to witness

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the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Regional Air Pollution Control Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Regional Air Pollution Control Agency .

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section**I. Applicable Emissions Limitations and/or Control Requirements**

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be

specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P004 - natural gas and No. 2 fuel oil fired simple cycle stationary combustion turbine No. 7 - Tait CT7, with a nominal production rating of 80 MW and a nominal heat input of 1115.2 mmBtu/hour, with dry low NOx combustion and water injection controls	None	None

2. Additional Terms and Conditions

2.a None

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

- The permit to install for this emissions unit (P001) was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: formaldehyde

TLV (mg/m3): 0.37

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.6971

MAGLC (ug/m3): 8.81

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Pollutant: beryllium

TLV (mg/m3): 0.002

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.0008

MAGLC (ug/m3): 0.05

Pollutant: arsenic

TLV (mg/m3): 0.01

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.0123

MAGLC (ug/m3): 0.24

Pollutant: benzene

TLV (mg/m3): 1.60

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.2142

MAGLC (ug/m3): 38.10

Pollutant: sulfuric acid mist

TLV (mg/m3): 1.00

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Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 13.56

MAGLC (ug/m3): 23.81

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
- c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

2. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the

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"Air Toxic Policy:"

- a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);
- b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and
- c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None