



1/2/2014

Elizabeth Gayne
East Ohio Gas Company - Austintown
5000 DOrnion Blvd
Glen Allen, VA 23060

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0250000911
Permit Number: P0085632
Permit Type: Renewal
County: Mahoning

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, Youngstown-Vindicator. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)425-9171.

Sincerely,

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 Via E-Mail Notification
Ohio EPA-NEDO; Pennsylvania; West Virginia

PUBLIC NOTICE

1/2/2014 Issuance of Draft Air Pollution Permit-To-Install and Operate

East Ohio Gas Company - Austintown

9686 NEW ROAD,

Austintown Twp., OH 44451-9708

Mahoning County

FACILITY DESC.: Natural Gas Distribution

PERMIT #: P0085632

PERMIT TYPE: Renewal

PERMIT DESC: FEPTIO Renewal of two natural gas RICE engines that will now be required to comply with 40 CFR 63 Subpart ZZZZ.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the permit # or: Jana Gannon, Ohio EPA DAPC, Northeast District Office, 2110 East Aurora Road, Twinsburg, OH 44087. Ph: (330)425-9171



DRAFT

Division of Air Pollution Control
Permit-to-Install and Operate
for
East Ohio Gas Company - Austintown

Facility ID:	0250000911
Permit Number:	P0085632
Permit Type:	Renewal
Issued:	1/2/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Permit-to-Install and Operate
for
East Ohio Gas Company - Austintown

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Draft Permit-to-Install and Operate

East Ohio Gas Company - Austintown

Permit Number: P0085632

Facility ID: 0250000911

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0250000911

Application Number(s): A0016304, A0016305

Permit Number: P0085632

Permit Description: FEPTIO Renewal of two natural gas RICE engines that will now be required to comply with 40 CFR 63 Subpart ZZZZ.

Permit Type: Renewal

Permit Fee: \$0.00 *DO NOT send payment at this time, subject to change before final issuance*

Issue Date: 1/2/2014

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

East Ohio Gas Company - Austintown
9686 NEW ROAD
Austintown Twp., OH 44451-9708

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

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

Ohio EPA DAPC, Northeast District Office
2110 East Aurora Road
Twinsburg, OH 44087
(330)425-9171

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s)) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and Federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director



Authorization (continued)

Permit Number: P0085632

Permit Description: FEPTIO Renewal of two natural gas RICE engines that will now be required to comply with 40 CFR 63 Subpart ZZZZ.

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

Group Name: 1265 HP 4SLB Engines

Emissions Unit ID:	B001
Company Equipment ID:	Engine #1
Superseded Permit Number:	02-18133
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	B002
Company Equipment ID:	Engine #2
Superseded Permit Number:	02-18133
General Permit Category and Type:	Not Applicable



Draft Permit-to-Install and Operate
East Ohio Gas Company - Austintown
Permit Number: P0085632
Facility ID: 0250000911
Effective Date: To be entered upon final issuance

A. Standard Terms and Conditions



1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is



very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the “Authorization” page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.



10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Ohio EPA DAPC, Northeast District Office in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the



change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.



Draft Permit-to-Install and Operate
East Ohio Gas Company - Austintown
Permit Number: P0085632
Facility ID: 0250000911
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Draft Permit-to-Install and Operate

East Ohio Gas Company - Austintown

Permit Number: P0085632

Facility ID: 0250000911

Effective Date: To be entered upon final issuance

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines at Area Sources. Although Ohio EPA has determined that this Generally Available Control Technology NESHAP (GACT) applies, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised, that all requirements associated with this rule are in effect and shall be enforced by U.S. EPA. For more information on the area source rules, please refer to the following U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>.



Draft Permit-to-Install and Operate
East Ohio Gas Company - Austintown
Permit Number: P0085632
Facility ID: 0250000911
Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group -1265 HP 4SLB Engines: B001, B002

EU ID	Operations, Property and/or Equipment Description
B001	Natural gas fired reciprocating internal combustion engine rated at 1265 HP (9.55 mmBtu/hr)-Caterpillar Model G3516LE, 4 stroke lean burn (4SLB) spark ignition (SI) internal combustion engine (ICE)with a Miratech catalytic converter; complying with emission limitations in 40 CFR 63, Subpart ZZZZ Table 2d #9; and installed before 6/12/06.
B002	Natural gas fired reciprocating internal combustion engine rated at 1265 HP (9.55 mmBtu/hr)-Caterpillar Model G3516LE, 4 stroke lean burn (4SLB) spark ignition (SI) internal combustion engine (ICE)with a Miratech catalytic converter; complying with emission limitations in 40 CFR 63, Subpart ZZZZ Table 2d #9; and installed before 6/12/06.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. d)(3), d)(4), d)(5), d)(6) and e)(5)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 63, Subpart ZZZZ (40 CFR 63.6580 to 63.6675) In accordance with 40 CFR 63.6585, this emissions unit is a stationary reciprocating internal combustion engine (RICE) subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal	The existing, natural gas, stationary 4SLB spark ignition (SI) RICE, located at an area source for hazardous air pollutants (HAPs), shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ no later than October 19, 2013. See b)(2)a and b)(2)b.



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	Combustion Engines.	
b.	40 CFR 63.6603(a) Table 2d #9 to Subpart ZZZZ Table 5 #13 to Subpart ZZZZ	Following the compliance date of 10/19/13, emissions of carbon monoxide (CO) shall not exceed 47 ppmvd at 15% O ₂ or emissions of carbon monoxide (CO) shall be reduced by 93% or more.
c.	OAC rule 3745-31-05(A)(3) (PTI 02-18133)	<p>Particulate emissions (PE) from each emissions unit shall not exceed 0.59 lb/hr and 2.59 tons per year.</p> <p>Nitrogen oxide (NO_x) emissions from each emissions unit shall not exceed 5.57 lbs/hr and 24.4 tons per year.</p> <p>Carbon monoxide (CO) emissions from each emissions unit shall not exceed 0.53 lbs/hr and 2.32 tons per year.</p> <p>Volatile organic compound (VOC) emissions from each emissions unit shall not exceed 1.39 lbs/hr and 6.10 tons per year.</p> <p>Formaldehyde emissions from each emissions unit shall not exceed 0.25 lb/hr and 1.10 tons per year.</p> <p>Maintain compliance with 40 CFR Part 63, Subpart ZZZZ.</p>
d.	OAC rule 3745-17-11(B)(5)	Particulate emissions (PE) shall not exceed 0.062 lb/MMBtu of actual heat input from RICE greater than 600 HP.
e.	OAC rule 3745-18-06(B)	Exempt. See b)(2)c.
f.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.
g.	ORC 3704.03(F)(4)	See d)(3), d)(4), d)(5), d)(6) and e)(5).

(2) Additional Terms and Conditions



- a. Following the compliance date of the NESHAP, the permittee shall control the emissions of CO from the stationary RICE exhaust using an oxidation catalyst control device. The permittee shall either limit the concentration of CO to 47 ppmvd or less at 15% O₂ at the outlet of the control device or the average reduction of CO, calculated according to 40 CFR 63.6620(e), shall not be less than 93% of the uncontrolled CO emissions.

[40 CFR 63.6603], [40 CFR 63.6640(a)], and [Subpart ZZZZ Table 2d #9]

- b. The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR 63.6595(a)(1)	The compliance date for Part 63 Subpart ZZZZ for existing SI RICE is 10/19/13.
Applicable Tables from Part 63, Subpart ZZZZ	Following the compliance date, comply with: emission limit options in Table 2d #9; the performance test methods in Table 4 #1 or #3; initial compliance demonstration in Table 5 #13; continuous compliance monitoring requirements in Table 6 #14; reporting requirements/frequency in Table 7; and the general provision from Subpart A in Table 8.
40 CFR 63.6603(a)	Following the compliance date, maintain compliance with the emission limitation in Table 2d #9 (limit CO to 47 ppmvd at 15% O ₂ or reduce CO by 93% or THC by 30%).
40 CFR 63.6603; 40 CFR 63.6612; 40 CFR 63.6620; 40 CFR 63.6630(e); and Subpart ZZZZ Tables 4 #1 or #3 and 5 #13	Conduct an initial performance test within 180 days following the compliance date, or by 4/19/14, using the appropriate test methods in Table 4 and as identified in §63.6630(e). By the compliance date, must either install CPMS to continuously monitoring the temperature at the inlet of the catalyst to the NSCR, reduce the data to 4-hour rolling averages, and maintain this temperature between 450 and 1,350 °F; or install a device that will automatically shut the engine off if the catalyst inlet temperature exceeds 1,350 °F.
40 CFR 63.63.6640(c); Subpart ZZZZ Table 4 #1 or #3 and Table 6 #14	Following the initial performance test must conduct annual compliance demonstrations in accordance §63.6640(c), using the test methods in Table 4 and Appendix A to Subpart ZZZZ; and continuously monitoring the temperature at the inlet of the catalyst to the NSCR, reduce the data to 4-hour rolling averages, and maintain this temperature between 450 and 1,350 °F; or install a device that will automatically shut the engine off if the catalyst inlet temperature exceeds 1,350 °F.
40 CFR 63.6625(b); and 40 CFR 63.8(c), (d), & (e)	If not installing a device that will automatically shut the engine off if the catalyst inlet temperature exceeds 1,350 °F, develop and implement a site-specific monitoring plan for the continuous monitoring system (CMS), i.e., the CPMS, to include a quality control program and performance evaluation test plan for the CMS, in



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	accordance with §63.8.
40 CFR 63.6665	Meet all of the general provisions of Subpart A, from §63.1 through §63.15, that apply to the SI RICE, as identified in Table 8 to Subpart ZZZZ.

- c. OAC rule 3745-18-06(B) exempts stationary internal combustion engines which have rated heat input capacities equal to, or less than, 10 million Btu/hour from the sulfur dioxide emission limit in OAC rule 3745-18-06(G). This emissions unit has a maximum heat input of 9.55 million Btu per hour.

c) Operational Restrictions

- (1) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR 63.6625(a)	If using CEMS for compliance, CEMS must be installed, operated, and maintained in continuous operation in accordance with the performance specifications of 40 CFR 60, Appendix B and this paragraph.
40 CFR 63.6625(b)(2) Subpart ZZZZ Table 5 #13 and Table 6 #14	CPMS must be installed, operated, and maintained in continuous operation in accordance with the site-specific monitoring plan, if not installing a device that will automatically shut the engine off if the catalyst inlet temperature exceeds 1,350 °F.
40 CFR 63.6605	General duty to minimize emissions, with good air pollution control practices for minimizing emissions; and compliance required at all times.
40 CFR 63.6625(h)	Minimize idle and startup time, not to exceed 30 minutes.
40 CFR 63.6603; 40 CFR 63.6640(a); and Subpart ZZZZ Table 5 #13 and Table 6 #14	Comply with operating limitations in Table 5 and 6: The rolling 4-hour average catalyst inlet temperature shall be maintained at greater than or equal to 450 degrees Fahrenheit and less than or equal to 1,350 degrees Fahrenheit, if not installing a device that will automatically shut the engine off if the catalyst inlet temperature exceeds 1,350 °F.
40 CFR 63.6625(b)(4) through (6)	If using CPMS for compliance, the permittee must conduct an annual equipment performance evaluation or system accuracy audit on the temperature measurement device. The temperature sensor must meet the minimum tolerance range and must be installed, operated, and maintained as specified in §63.6625(b) and in accordance with the site-specific monitoring plan.

- (2) The permittee shall use only natural gas as a fuel in the emissions units covered by this permit.

d) Monitoring and/or Recordkeeping Requirements



Effective Date: To be entered upon final issuance

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in these emissions units.

- (3) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR 63.6625(a) and 40 CFR 63.8	If using CEMS for compliance with the CO standard, the CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive minute of operations (Ohio policy), with an average recorded for each 15-minute period. Data from the CEMS (excluding that collected during calibration, quality assurance, or maintenance activities, out-of-control periods, and/or CEMS breakdown) shall be reduced to 1-hour averages, computed from the four 15-minute averages.
40 CFR 63.6625(b); 40 CFR 63.8; and Subpart ZZZZ Table 6 #14	Following the compliance date, if not installing a device that will automatically shut the engine off if the catalyst inlet temperature exceeds 1,350 °F, CPMS shall be installed to continuously monitor the catalyst inlet temperature to the NSCR. The CPMS must collect data at least once every 15 minutes and the catalyst inlet temperature shall be reduced to 4-hour rolling averages.
40 CFR 63.6635	Except for monitor malfunctions, associated repairs, and required quality assurance activities, must continuously monitor that the RICE is operating. Must use all valid data (not recorded during malfunctions, repairs, or required quality assurance or control activities) in calculations used to report emissions or operating levels.
40 CFR 63.6640(a)	Demonstrate continuous compliance with the emission limitation and operating limitations identified in Table 2d according to the methods specified in Table 6 #14 to Subpart ZZZZ.
40 CFR 63.6655(a) and 40 CFR 63.10	Keep records of: 1. each notification and report submitted to comply with Part 63, Subpart ZZZZ; 2. the occurrence and duration of each malfunction of the RICE and any control or monitoring equipment; 3. corrective actions taken during each period of malfunction to minimize emissions and restore normal operations; 4. records of performance tests and performance evaluations of the CPMS; 5. all required maintenance performed on air pollution control and monitoring equipment; and 6. any excess emissions or parameter monitoring exceedances, as identified by §63.10.
40 CFR 63.6655(b); 40 CFR 63.10(b); and 40 CFR 63.8(d)	Keep records for each CPMS used to demonstrate compliance, including: the performance evaluation/test plan; previous versions of the performance evaluation plan; performance tests and evaluations; results of the quality control program; CPMS calibration checks or system accuracy audits; maintenance performed on air pollution control and monitoring equipment; the occurrence, duration, and corrective actions taken during periods of malfunction; and all measurements needed to demonstrate compliance with the relevant standard.



40 CFR 63.6655(d)	Keep the records required in Table 6 to Subpart ZZZZ to demonstrate continuous compliance.
40 CFR 63.6625(h)	Maintain a record of each idle and/or startup time that exceeded 30 minutes.
40 CFR 63.6660	Records readily available and retained for at least 5 years after the date of occurrence or date of report according to §63.10(b)(1).
40 CFR 63.6625(a) and 40 CFR 63.8	If using CEMS for compliance with the CO standard, the CEMS shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive minute of operations (Ohio policy), with an average recorded for each 15-minute period. Data from the CEMS (excluding that collected during calibration, quality assurance, or maintenance activities, out-of-control periods, and/or CEMS breakdown) shall be reduced to 1-hour averages, computed from the four 15-minute averages.

(4) The FEPTIO application for these emissions units, B001 and B002, was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this emissions unit for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit, (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
 - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
 - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).



- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., “X” hours per day and “Y” days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$TLV/10 \times 8/X \times 5/Y = 4 TLV/XY = MAGLC$$

- d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or “worst case” toxic contaminant(s):

Toxic Contaminant: Formaldehyde

TLV (mg/m³): 374.73

Maximum Hourly Emission Rate (lbs/hr): 0.50

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m³): 5.8

MAGLC (ug/m³): 6.5

The permittee, has demonstrated that emissions of formaldehyde, from emissions units B001 and B002, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (5) Prior to making any physical changes to or changes in the method of operation of the emissions unit, that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
 - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” 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 a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC



3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final FEPTIO prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (6) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):
 - a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);
 - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
 - d. the documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (7) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

e) Reporting Requirements

- (1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA eBusiness Center: Air Services by the due date identified in the Authorization section of this permit. The PER shall cover a reporting period of no more than 12-months for each air contaminant source identified in this permit.

[OAC rule 3745-15-03(B)(2) and (D)]



- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in these emissions units. Each report shall be submitted within 30 days after the deviation begins.
- (3) A comprehensive written report on the results of the performance tests, conducted to demonstrate compliance with 40 CFR 63.6603(a), shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northeast District Office 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 appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-15-04(A)]

- (4) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR 63.6640(b); Subpart ZZZZ Tables 5 #13 and 6 #14	Submit a report of each instance in which the chosen emission limitation, the control device requirements, or operating limitations in Tables 2d, 5, and 6 were not met; these deviations to be reported according to the requirements of §63.6650.
40 CFR 63.6640(e)	Submit a report of each instance in which the applicable requirements in Table 8 to Subpart ZZZZ, the general provisions from Subpart A, were not met.
40 CFR 63.6645(a)(2)	Submit all notifications required per §63.7(b) and (c); §63.8(e), (f)(4), and (f)(6); and §63.9(b) through (e), (g), and (h) that apply to the SI RICE.
40 CFR 63.6625(b); 40 CFR 63.7(c); and 40 CFR 63.8(d) & (e)(3)	Upon request, submit a performance evaluation test plan for each monitoring system and/or the site-specific test plan to the office requesting it.
40 CFR 63.6645(g); 40 CFR 63.7(b); 40 CFR 63.8(e); and 40 CFR 63.9(e) & (g)	Submit a Notification of Intent to conduct a performance test for the emissions unit or a performance evaluation of the CEMS at least 60 days before the test is scheduled to begin.
40 CFR 63.6645(h); 40 CFR 63.6630(e); 40 CFR 63.6640(c); 40 CFR 63.8(e)(5); 40 CFR 63.9(h); 40 CFR 63.10(d)(2) & (e)(2); and OAC rule 3745-15-04(A)	Submit a Notification of Compliance Status for each compliance demonstration required per Subpart ZZZZ, including the performance test and CMS performance evaluation results, before the close of business on the 60 th day following the completion of the test; or within 30 days of the initial compliance demonstration if the demonstration does not include a performance test. OAC rule 3745-15-04(A) requires performance test results to be submitted within 30 days of the test date unless additional time is requested.
40 CFR 63.6650(a)	Submit each applicable report in Table 7 of Subpart ZZZZ.
40 CFR 63.6650(b)(1) to (5) and Subpart ZZZZ Table 7 #3	Following the initial compliance date, submit Semiannual Compliance Reports to include the information identified in §63.6650(c) through (f), as applicable to the SI RICE. Following the initial compliance report, each subsequent report shall cover the reporting period from January 1 st through June 30 th and July



	1 st through December 31 st . The Semiannual Compliance Reports must be postmarked or delivered no later than July 31 st and January 31 st .
40 CFR 63.6650(c)	§63.6650(c) contains the required information to be submitted in each compliance report.
40 CFR 63.6650(d) & (e)	§63.6650(d) contains the required information to be submitted for each deviation from an emission or operating limitation not monitored by a CMS and §63.6650(e) the information needed where using a CMS to comply with the emission or operating limitation.

(5) The permittee shall also submit annual reports to the Ohio EPA, Northeast District Office, documenting any changes made to a parameter or value used in the dispersion model (including the air toxic compounds emitted and the emission rate), that was used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect.

f) Testing Requirements

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

a. Emission Limitation:

Visible particulate emissions from the exhaust stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated through visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[OAC rule 3745-17-07(A)(1)]

b. Emission Limitations:

PE shall not exceed 0.062 lb/MMBtu of actual heat input from RICE greater than 600 HP.

PE from each emissions unit shall not exceed 0.59 lb/hr and 2.59 tons per year.

Applicable Compliance Method:



If required, the permittee shall demonstrate compliance with the short-term emission limitations through exhaust emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5.

Compliance with the ton per year PE limitation shall be determined by the following calculations:

$$0.062 \text{ lb PE/MMBtu} \times 9.55 \text{ MMBtu/hr} = 0.59 \text{ lb PE/hr}$$

$$0.59 \text{ lb PE/hr} \times 8760 \text{ hours/year} \times 1 \text{ ton}/2000 \text{ lbs} = 2.59 \text{ tons PE/year}$$

[OAC rule 3745-17-11(B)(5)]

c. Emission Limitations:

NO_x emissions from each emissions unit shall not exceed 5.57 lbs/hr and 24.4 tons per year.

Applicable Compliance Method:

The NO_x hourly emission limitation is based on using the Caterpillar Manufacturers emission factor of 2.0 g NO_x/HP-hr for engine model G3516LE and a conversion factor of 0.0022 lbs/g.

Compliance with the hourly and ton per year NO_x emission limitations shall be determined by the following calculations:

$$2.0 \text{ g NO}_x/\text{HP-hr} \times 1265 \text{ HP} \times 0.0022 \text{ lbs/g} = 5.57 \text{ lbs NO}_x/\text{hr}$$

$$5.57 \text{ lbs NO}_x/\text{hr} \times 8760 \text{ hours/year} \times 1 \text{ ton}/2000 \text{ lbs} = 24.4 \text{ tons NO}_x/\text{year}$$

If required, the permittee shall demonstrate compliance with the emission limitations through exhaust emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7.

d. Emission Limitations:

CO emissions from each emissions unit shall not exceed 0.53 lbs/hr and 2.32 tons per year.

Applicable Compliance Method:

The CO hourly emission limitation is based on using the Caterpillar Manufacturers emission factor of 0.19 g CO/HP-hr for engine model G3516LE with Miratech emissions data for catalyst reduction and a conversion factor of 0.0022 lbs/g.

Compliance with the hourly and ton per year CO emission limitations shall be determined by the following calculations:



$0.19 \text{ g CO/HP-hr} \times 1265 \text{ HP} \times 0.0022 \text{ lbs/g} = 0.53 \text{ lbCO/hr}$

$0.53 \text{ lbCO/hr} \times 8760 \text{ hours/year} \times 1 \text{ ton}/2000 \text{ lbs} = 2.32 \text{ tons CO/year}$

If required, the permittee shall demonstrate compliance with the emission limitations through exhaust emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10; or if choosing to demonstrate compliance with the NESHAP, Subpart ZZZZ, through the reduction of CO, see the testing requirements below.

e. Emission Limitations:

Following the compliance date of 10/19/13, emissions of CO shall not exceed 47 ppmvd at 15% O₂ or emissions of CO shall be reduced by 93% or more.

Applicable Compliance Method:

Unless a performance test is submitted that meets the requirements of 40 CFR 63.6612(b), the permittee shall conduct an initial performance test within 180 days after the compliance date or no later than 04/19/14, to demonstrate compliance with the CO limitation in the NESHAP. The appropriate tests methods from Table 4 to Subpart ZZZZ shall be conducted based on the option chosen for compliance, i.e., the part per million concentration or percent reduction. The appropriate emission and/or operating limitations, required per 40 CFR 63.6630 and identified in Table 5, shall be established and compliance demonstrated during each performance test.

If equipment has not been installed to automatically shut down the engine if the catalyst inlet temperature exceeds 1,350 °F, the temperature at the inlet to the oxidation catalyst shall be continuously monitored and the 4-hour rolling average temperature shall be maintained between 450 °F and 1,350 °F. The CPMS, installed to measure the temperature at the inlet to the oxidation catalyst, shall complete one cycle of operation for each successive 15-minute period of operations, with a minimum of 4 successive cycles or operation for each valid hour of testing, and in accordance with 40 CFR 63.6625(b). If the catalyst is changed or the control device replaced, a new performance test must be conducted to demonstrate compliance with the emission limitation or control requirement and to reestablish the values for, or compliance with, the operating parameters.

The initial compliance demonstration shall consist of at least 3 test runs and each test run shall last a minimum of 15 minutes, except that each test conducted shall consist of at least 1 measurement cycle and include at least 2 minutes of test data phase measurement, using the method in Appendix A of 40 CFR Part 63, Subpart ZZZZ.

The annual compliance demonstration shall consist of at least 1 test run and the/each test run shall last a minimum of 15 minutes, except that each test conducted shall consist of at least 1 measurement cycle and include at least 2



minutes of test data phase measurement, using the method in Appendix A of 40 CFR Part 63, Subpart ZZZZ.

The testing shall be conducted during normal operations. The engine percent load during the performance test shall be determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load; and the estimated percent load shall be included in the notification of compliance.

A compliant performance test shall demonstrate that either the CO emissions have been reduced by 93% or that the average CO concentration is less than or equal to 47 ppmvd, corrected to 15 percent O₂ on a dry basis, and from three 1-hour or longer performance test runs.

If demonstrating compliance with the 93% control requirement for CO, the permittee may use a portable CO and O₂ analyzer at the inlet and outlet of the control device and use ASTM Method D6522-00 to meet the performance testing requirement in Table 4 to Subpart ZZZZ. The CO concentrations at the inlet and outlet of the control device must be normalized to a dry basis and to 15% oxygen, or an equivalent percent CO₂, as required in 40 CFR 63.6620(e).

The following test methods shall be employed to demonstrate compliance with the emission limitation for CO or may be used to demonstrate compliance with the control requirement for CO:

- i. Method 1 or 1A of 40 CFR Part 60, Appendix A to select the sampling port location and the number of traverse points
- ii. Method 3, 3A, or 3B of 40 CFR Part 60, Appendix A or ASTM Method D6522-00 to measure O₂ at the inlet and outlet of the control device to normalize the CO concentration(s).
- iii. Method 4 of 40 CFR Part 60, Appendix A; or Method 320 of 40 CFR Part 63, Appendix A; or ASTM D6348-03 to measure the moisture content at the inlet and outlet of the control device if demonstrating compliance through the percent control or to measure the moisture content of the stationary RICE exhaust.
- iv. Method 10 of 40 CFR Part 60, Appendix A; or ASTM Method D6522-00; or Method 320 of 40 CFR Part 63, Appendix A; or ASTM D 6348-03 to measure CO at the inlet and outlet of the control device if demonstrating compliance through the percent control or to measure CO at the exhaust of the stationary RICE.
- v. The following equation shall be used to normalize the CO concentrations to a dry basis and to 15 percent oxygen (O₂)**:

$$C_{adj} = C_d (5.9 / 20.9 - \% O_2)$$

where:



C_{adj} = calculated CO concentration adjusted to 15 percent O_2 .

C_d = measured concentration of CO, uncorrected.

5.9 = 20.9 percent O_2 - 15 percent O_2 , the defined O_2 correction value, percent.

% O_2 = measured O_2 concentration, dry basis, percent.

** Optionally, the pollutant concentrations can be corrected to 15% O_2 using a CO_2 correction factor, by calculating the fuel factor (F_o value) using Method 19 results obtained during the performance test (40 CFR 63.6620(e)(2)).

- vi. If compliance is demonstrated for the control efficiency for CO, the following equation shall be used to determine the percent reduction:

$$R = (C_i - C_o) / C_i \times 100$$

where:

C_i = concentration of CO at the control device inlet,

C_o = concentration of CO at the control device outlet, and

R = percent reduction of CO emissions.

If using CEMS to monitor and comply with the CO concentration limitation or requirement to reduce CO emissions, the permittee shall conduct annual relative accuracy test audits (RATA) using Performance Specifications 3 and 4A of 40 CFR Part 60, Appendix B and daily and periodic data quality checks in accordance with 40 CFR Part 60, Appendix F, Procedure 1.

If using a CPMS to demonstrate compliance, the permittee shall conduct subsequent performance tests for CO (concentration or % reduction) every 8,760 hours of operation or every 3 years, whichever comes first. The CPMS, installed to measure the temperature at the inlet to the NSCR catalyst, shall complete one cycle of operation for each successive 15-minute period of operations, with a minimum of 4 successive cycles or operation for each valid hour of testing, and in accordance with 40 CFR 63.6625(b).

The permittee shall notify the Director (Ohio EPA Northeast District Office) in writing of each scheduled performance test date or RATA for the CEMS at least 60 calendar days before it is scheduled, to allow the agency time to review and approve the site-specific test plan and to arrange for an observer to be present during the compliance demonstration.

Personnel from the Ohio EPA Northeast District Office 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.

[40 CFR 63.7(a)(2), (b)(1), and (e)(3)], [40 CFR 63.6603(a)], [40 CFR 63.6612],[40 CFR 63.6615], [40 CFR 63.6620],[40 CFR 63.6630(e)], [40 CFR 63.6640(a) and (c)], [40 CFR 63.6645(a)(2)],[Part 63, Subpart ZZZZ, Table2d #9; Table 4 #1 or #3;Table 5 #1, #2, #5, or #6; and Table 6 #3 or #10], and [OAC rule 3745-15-04(A)]

f. Emission Limitations:

VOC emissions from each emissions unit shall not exceed 1.39 lbs/hr and 6.10 tons per year.

Applicable Compliance Method:

The VOC emissions limit is based on using the Caterpillar Manufacturers emission factor of 0.5 g VOC/HP-hr for engine model G3516LE and a conversion factor of 0.0022 lbs/g.

Compliance with the hourly and ton per year VOC emission limitations shall be determined by the following calculations:

$$0.5 \text{ g VOC/HP-hr} \times 1265 \text{ HP} \times 0.0022 \text{ lbs/g} = 1.39 \text{ lbsVOC/hr}$$

$$1.39 \text{ lbsVOC/hr} \times 8760 \text{ hours/year} \times 1 \text{ ton/2000 lbs} = 6.10 \text{ tons VOC/year}$$

If required, the permittee shall demonstrate compliance with the emission limitations through exhaust emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25.

g. Emission Limitations:

Formaldehyde emissions from each emissions unit shall not exceed 0.25 lb/hr and 1.10 tons per year.

Applicable Compliance Method:

The Formaldehyde emissions limit is based on using the Caterpillar Manufacturers emission factor of 0.09 g Formaldehyde/HP-hr for engine model G3516LE with Miratech emissions data for catalyst reduction and a conversion factor of 0.0022 lbs/g.

Compliance with the hourly and ton per year Formaldehyde emission limitations shall be determined by the following calculations:

$$0.09 \text{ g Formaldehyde/HP-hr} \times 1265 \text{ HP} \times 0.0022 \text{ lbs/g} = 0.25 \text{ lbFormaldehyde /hr}$$

$$0.25 \text{ lbFormaldehyde/hr} \times 8760 \text{ hours/year} \times 1 \text{ ton/2000 lbs} = 1.10 \text{ tons Formaldehyde/year}$$



Draft Permit-to-Install and Operate

East Ohio Gas Company - Austintown

Permit Number: P0085632

Facility ID: 0250000911

Effective Date: To be entered upon final issuance

* The heating value of natural gas may be adjusted to that provided by the supplier.

g) Miscellaneous Requirements

(1) None.