John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Interim Director

1/9/2014

Certified Mail

Facility ID: 0247080487
Permit Number: P0105031
County: Lorain

Mr. Robert Williams, II
West Lorain Plant
76 S. Main St.
13th Floor
Akron, OH 44308-0000

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is a finalOhio Environmental Protection Agency (EPA) Air Pollution Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this Title V permit is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging 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 Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF 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.

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northeast District Office as indicated on page one of your permit.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Ohio EPA DAPC, Northeast District Office

FINAL

Division of Air Pollution Control
Title V Permit
for
West Lorain Plant

Facility ID:	0247080487
Permit Number:	P0105031
Permit Type:	Renewal
Issued:	1/9/2014
Effective:	1/30/2014
Expiration:	1/30/2019

Division of Air Pollution Control
Title V Permit
for
West Lorain Plant

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Authorization

Facility ID:	0247080487
Facility Description:	Electrical Generation
Application Number(s):	A0036318
Permit Number:	P0105031
Permit Description:	Title V Renewal for Electric Utility Generating Station
Permit Type:	Renewal
Issue Date:	1/9/2014
Effective Date:	1/30/2014
Expiration Date:	1/30/2019
Superseded Permit Number:	P0085411

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

West Lorain Plant
7101 WEST ERIE AVENUE
Lorain, OH 44053-0000

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 a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northeast District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Interim Director

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northeast District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northeast District Office unless otherwise specified.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. 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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

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 permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. 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, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northeast District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northeast District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms

and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northeast District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio EPA DAPC, Northeast District Office.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northeast District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

25. Records Retention RequirementsUnder State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northeast District Office in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northeast District Office must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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 by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northeast District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

B. Facility-Wide Terms and Conditions

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

   a) None.

2. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any requirements or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

EU ID	Operations, Property and/or Equipment Description
P006	Pre-heater for incoming pipeline natural gas, A.
P007	Pre-heater for incoming pipeline natural gas, B.
T001	3,400,000 Gallon Fuel Oil Tank.
T002	1A Peaker Lube Oil Reservoir (1,700 Gallon).
T003	1B Peaker Lube Oil Reservoir (1,700 Gallon).
T004	1C Peaker Lube Oil Reservoir (2,600 Gallon).
T005	Main Unit/Peakers Lube Oil Storage Tank.
T006	EHC Oil Tank.
T007	1C Lube Vapor Oil Extractor.

3. The permittee shall ensure that any CAIR NOx, SO2, or NOx ozone season units complies with the requirements of OAC 3745-109, which includes submitting timely permit applications. The permittee shall ensure that the affected emissions units comply with those requirements. Emissions exceeding any allowances that are lawfully held under Ohio rule 3745-109 are prohibited.

   a) [Authority for term: OAC rule 3745-77-07(A)(5)]

4. The permittee shall also comply with any subsequent federally mandated programs that may replace the CAIR program affecting electric generating facilities (see note in paragraph 5.b).

   a) [Authority for term: OAC rule 3745-77-07(A)(5)]

5. The permittee shall ensure that any CAIR NO_x, SO_2, or NO_x ozone season units complies with the requirements of OAC chapter 3745-109, which includes submitting timely permit applications. The permittee shall ensure that the affected emissions units comply with those requirements as outlined in the permit application submitted as required by OAC rules 3745-109-03, 3745-109-10 and 3745-109-16 for the affected emissions units.

   The permittee shall also comply with any subsequent federally mandated programs that may replace the CAIR program affecting electric generating facilities.

   Note: Ohio EPA DAPC has completed proposed rule amendments for OAC chapter 3745-14, specifically, OAC rule 3745-14-01 and OAC rule 3745-14-06, which facilitated the transition of the affected units from OAC chapter 3745-14 into the federal Clean Air Interstate Rule (CAIR) program which began with the 2009 control periods. This began the process of "sunsetting" the parts of OAC chapter 3745-14 which were no longer needed as a result of Ohio's CAIR rules (OAC chapter 3745-109).

On July 6, 2010, US EPA announced the proposed CAIR replacement rule, the "Transport Rule" as required by the original court vacatur of the federal CAIR program in July 2008. The current time frame for the requirements of this program, as far as new state emission budgets, was to begin with the 2012 control periods, but has now been delayed as a result of a stay of Cross State Air Pollution Rule (CSAPR) by the courts on December 30, 2011 and the subsequent court ruling vacating CSAPR on August 21, 2012.. The CAIR allowances for affected units and requirements of the CAIR will continue for the 2012 control periods and pending the promulgation of a valid replacement.

[Authority for term: OAC rules 3745-109 and 3745-77-07(A)(5)]

6. Acid Rain Permits and Compliance – OAC chapter 3745-103

   The permittee shall ensure that any affected unit complies with the requirements of OAC Chapter 3745-103, which includes submitting timely permit applications. Emissions exceeding any allowances that are lawfully held pursuant to this rule are prohibited. The requirements of this rule will be specified in the Title V permit issued to this facility.

7. All asbestos renovation and demolition activities conducted at this facility shall be performed in accordance with the applicable requirements specified in 40 CFR Part 61, Subpart M.

8. The facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

C. Emissions Unit Terms and Conditions

1. B003, AUX. BOILER, A

Operations, Property and/or Equipment Description:

56.6 mmBtu/hr (nominal capacity) heat input rated, distillate oil-fired steam boiler for process steam and space heat.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input.
c.	OAC rule 3745-18-53(A)(1)	Sulfur dioxide emissions shall not exceed 2.32 lbs/mmBtu of actual heat input.

(2) Additional Terms and Conditions

a. This emissions unit is not currently subject to the requirements specified in 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. Emissions unit B003 is exempt from the requirements of 40 CFR Part 60, Subpart Dc because B003 was installed in 1973 prior to the applicability date of June 9, 1989 specified in 40 CFR 60.40c.

c) Operational Restrictions

(1) The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in this permit.

[Authority for term: OAC rule 3745-18-53]

(2) The permittee shall burn only distillate oils in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below:

a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as ASTM methods D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

[Authority for term: OAC rules 3745-18-04(E)(3) and 3745-18-04(I)]

(2) For each day during which the permittee burns a fuel other than distillate oil, the permittee shall maintain a record of the type and quantity of the fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from d)(1) above. The notification shall be submitted to the Director (Ohio EPA, Northeast District Office) within 45 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-03(C)]

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than distillate oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-03(C)]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:

Sulfur dioxide emissions shall not exceed 2.32 lbs/mmBtu of actual heat input.

<u>Applicable Compliance Method</u>:

Continuous compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received, or each daily composite sample of the oil burned during each calendar day, meets the limitation.

Sulfur dioxide emissions from liquid fuel samples shall be calculated as follows:

$ER = [(1 \times 10^{6}) / H] \times D \times S \times 1.974$

where:

ER = the emission rate in pounds of sulfur dioxide per MMBtu;

H = the heat content of the liquid fuel in Btu per gallon;

D = the density of the liquid fuel in pounds per gallon; and

S = the decimal fraction of sulfur in the liquid fuel.

[OAC rule 3745-18-04(F)(2)]

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

[OAC rule 3745-18-04(E)]

b. Emission Limitation:

Particulate emissions from this emissions unit shall not exceed 0.020 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum fuel oil burning capacity of the emissions unit (410 gallons/hr) by the AP-42 emission factor for distillate oil (2.0 lbs PE per 1,000 gallons – Section 1.3, Table 1.3-1(5/10)), and dividing by the maximum hourly heat input capacity of the emissions unit (56.6 mmBtu/hr).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(9).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-17-10(B)(1)]

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, as except provide by the rule.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)(a)]

g) Miscellaneous Requirements

(1) None.

2. B006, AUX. BOILER, B

Operations, Property and/or Equipment Description:

10.4 mmBtu/hr (nominal capacity) heat input rated, distillate oil-fired steam boiler for space heat.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu of actual heat input.
c.	OAC rule 3745-18-53(A)(1)	Sulfur dioxide emissions shall not exceed 5.87 lbs/mmBtu of actual heat input.
d.	OAC rule 3745-31-05(A)(3) (PTI 19-102)	The requirements of this rule are equivalent to the requirements of OAC rule 3745-17-07(A), OAC rule 3745-17-10(B) and OAC rule 3745-18-53(A)(1).

(2) Additional Terms and Conditions

a. This emissions unit is not currently subject to the requirements specified in 40 CFR Part 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. Emissions unit B006 is exempt from the requirements of 40 CFR Part 60, Subpart Dc because B006 was installed in 1982 prior to the applicability date of June 9, 1989 specified in 40 CFR 60.40c.

c) Operational Restrictions

(1) The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in this permit.

[Authority for term: OAC rule 3745-18-53]

(2) The permittee shall burn only distillate oils in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below:

a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as ASTM methods D240 Standard Test Method

for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

[Authority for term: OAC rules 3745-18-04(E)(3) and 3745-18-04(I)]

(2) For each day during which the permittee burns a fuel other than distillate oil, the permittee shall maintain a record of the type and quantity of the fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from d)(1) above. The notification shall be submitted to the Director (Ohio EPA, Northeast District Office) within 45 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-03(C)]

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than distillate oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-03(C)]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Sulfur dioxide emissions shall not exceed 2.32 lbs/mmBtu of actual heat input.

Applicable Compliance Method:

Continuous compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received, or each daily composite sample of the oil burned during each calendar day, meets the limitation.

Sulfur dioxide emissions from liquid fuel samples shall be calculated as follows:

$ER = [(1 \times 10^{6}) / H] \times D \times S \times 1.974$

where:

ER = the emission rate in pounds of sulfur dioxide per MMBtu;

H = the heat content of the liquid fuel in Btu per gallon;

D = the density of the liquid fuel in pounds per gallon; and

S = the decimal fraction of sulfur in the liquid fuel.

[OAC rule 3745-18-04(F)(2)]

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

[OAC rule 3745-18-04(E)]

b. Emission Limitation:

Particulate emissions from this emissions unit shall not exceed 0.020 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance shall be determined by multiplying the maximum fuel oil burning capacity of the emissions unit (75 gallons/hr) by the AP-42 emission factor for distillate oil (2.0 lbs PE per 1,000 gallons – Section 1.3, Table 1.3-1(5/10)), and dividing by the maximum hourly heat input capacity of the emissions unit (10.4 mmBtu/hr).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(9).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-17-10(B)(1)]

c. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, as except provide by the rule.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)(a)]

g) Miscellaneous Requirements

(1) None.

3. Emissions Unit Group -Newer CT's: P001, P002, P003, P004, P005,

EU ID	Operations, Property and/or Equipment Description
P001	CT-2, 85 Megawatt (Nominal) Simple Cycle Stationary Combustion Turbine.
P002	CT-3, 85 Megawatt (Nominal) Simple Cycle Stationary Combustion Turbine.
P003	CT-4, 85 Megawatt (Nominal) Simple Cycle Stationary Combustion Turbine.
P004	CT-5, 85 Megawatt (Nominal) Simple Cycle Stationary Combustion Turbine.
P005	CT-6, 85 Megawatt (Nominal) Simple Cycle Stationary Combustion Turbine.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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.	OAC rules 3745-31-10 through 3745-31-20 and 40 CFR Part 52.21 (PTI 02-13376)	When firing natural gas, particulate/PM10** emissions from each emissions unit shall not exceed 5.0 lbs/hr. When firing distillate oil, particulate/PM10** emissions from each emissions unit shall not exceed 10.0 lbs/hr. Particulate/PM10** emissions from emissions units P001 through P005, combined, shall not exceed 75.5 tons per rolling, 12-month period. **The total PM10 emissions were evaluated and did not trigger any additional federal requirements, therefore, the emissions are being regulated as particulate emissions. When firing natural gas, nitrogen oxides emissions from each emissions unit shall not exceed 9 ppmv at 15% oxygen on a dry basis, as a rolling, 12-month average

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		and 15 ppmv at 15% oxygen on a dry basis, at full load, as a 1-hour average. When firing distillate oil, nitrogen oxides emissions from each emissions unit shall not exceed 42 ppmv at 15% oxygen on a dry basis, at full load, as a 1-hour average. See b)(2)i. Nitrogen oxides emissions from each emissions unit (including startup and shutdown) shall not exceed 125.9 tons per rolling, 12-month period. Carbon monoxide emissions from each emissions unit shall not exceed 83.0 lbs/hr. Carbon monoxide emissions from emissions units P001 through P005, combined, shall not exceed 499.9 tons per rolling, 12-month period. When firing natural gas, organic compound emissions from each emissions unit shall not exceed 10.0 lbs/hr. When firing distillate oil, organic compound emissions from each emissions unit shall not exceed 11.0 lbs/hr. Organic compound emissions from emissions units P001 through P005, combined, shall not exceed 122.0 tons per rolling, 12-month period. See b)(2)a.
b.	OAC rule 3745-31-05(D) (PTI 02-13376) (Synthetic minor restrictions to avoid PSD rule requirements.)	When firing natural gas, sulfur dioxide emissions from each emissions unit shall not exceed 0.007 lb/mmBtu of actual heat input.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		When firing distillate oil, sulfur dioxide emissions from each emissions unit shall not exceed 0.3 lb/mmBtu of actual heat input. Sulfur dioxide emissions from emissions units P001 through P005, combined, shall not exceed 39.9 tons per rolling, 12-month period. See b)(2)b, c)(1) and c)(2). When firing distillate oil, sulfuric acid mist emissions from each emissions unit shall not exceed 0.033 lb/mmBtu of actual heat input. Sulfur acid mist emissions from emissions units P001 through P005, combined, shall not exceed 4.2 tons per rolling, 12-month period.
c.	OAC rule 3745-31-05(D) (PTI 02-13376) (Synthetic minor restrictions to avoid MACT rule requirements.)	When firing natural gas, formaldehyde emissions from each emissions unit shall not exceed 0.000713 lb/mmBtu of actual heat input. Formaldehyde emissions from emissions units P001 through P005, combined, shall not exceed 8.5 tons per rolling, 12-month period. See b)(2)c and c)(3).
d.	OAC rule 3745-31-05(A)(3) (PTI 02-13376)	When firing natural gas, visible particulate emissions from each emissions unit shall not exceed 10% opacity, as a 6-minute average. When firing distillate oil, visible particulate emissions from each emissions unit shall not exceed 20% opacity, as a 6-minute average. During startup and shutdown periods, when firing natural gas, nitrogen oxides emissions from each emissions unit shall not exceed 175.0 lbs/hr.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		During non-startup and shutdown periods, when firing natural gas, nitrogen oxides emissions from each emissions unit shall not exceed 143.0 lbs/hr. During startup and shutdown periods, when firing distillate oil, nitrogen oxides emissions from each emissions unit shall not exceed 235.0 lbs/hr. During non-startup and shutdown periods, when firing distillate oil, nitrogen oxides emissions from each emissions unit shall not exceed 215.0 lbs/hr. When firing natural gas, sulfur dioxide emissions from each emissions unit shall not exceed 0.6 lb/hr. When firing distillate oil, sulfur dioxide emissions from each emissions unit shall not exceed 339.0 lbs/hr. When firing natural gas, formaldehyde emissions from each emissions unit shall not exceed 0.617 lb/hr. When firing distillate oil, sulfur acid mist emissions from each emissions unit shall not exceed 35.4 lbs/hr. See b)(2)d and b)(2)e.
e.	40 CFR Part 60, Subpart GG	The nitrogen oxides emission limitation specified by this rule is less stringent than the nitrogen oxides emission limitation established pursuant to 40 CFR Part 52 and OAC Chapter 3745-31. The sulfur dioxide emission limitation specified by this rule is less stringent than the sulfur dioxide emission limitation established pursuant to 40 CFR Part 52 and OAC rule 3745-31-05(D). See b)(2)f.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rule 3745-17-07(A)	The visible particulate emission limitation specified by this rule is less stringent than the visible particulate emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-17-11(B)(4)	The particulate emission limitation specified by this rule is less stringent than the particulate/PM10 emission limitations established pursuant to 40 CFR Part 52 and OAC Chapter 3745-31.
h.	OAC rule 3745-18-06(F)	When firing distillate oil, the sulfur dioxide emission limitation specified by this rule is less stringent than the sulfur dioxide emission limitation established pursuant to OAC rule 3745-31-05(D). When firing natural gas, pursuant to OAC rule 3745-18-06(A), each emissions unit is exempt from the sulfur dioxide emission limitation specified by this rule.

(2) Additional Terms and Conditions

a. The following Best Available Control Technology (BACT) determinations have been made in accordance with the PSD regulations

Particulate/PM10 emissions – the BACT determination is the use of only clean burning fuels (i.e., natural gas and distillate oil) in the combustion turbine and compliance with specific emission limitations.

Nitrogen oxides emissions - the BACT determination is the use of dry low-nitrogen oxides burners when firing natural gas, water injection into the combustion zone when firing distillate oil, and compliance with the ppm emission limitation.

Carbon monoxide emissions – the BACT determination is the use of the combustion technology inherent in the design of the combustion turbine.

Organic compound emissions – the BACT determination is the use of the combustion technology inherent in the design of the combustion turbine.

b. The annual sulfur dioxide emission limitation establishes the synthetic minor restriction which exempts emissions units P001 through P005 from the requirements of the PSD regulations for this pollutant.

c. The annual formaldehyde emission limitation establishes the synthetic minor restriction which exempts emissions units P001 through P005 from the requirements of the MACT regulations.

d. The Best Available Technology (BAT) determination required under OAC rule 3745-31-05(A)(3) includes compliance with the specified emission limitations and also includes compliance with the emission limitations and operating requirements specified by 40 CFR Part 52, OAC rules 3745-31-10 through 3745-31-20, and OAC rule 3745-31-05(D).

e. The hourly nitrogen oxides (non-startup and shutdown), sulfur dioxide, formaldehyde and sulfuric acid mist emission limitations, established pursuant to OAC rule 3745-31-05(A)(3), reflect the potentials to emit for these pollutants for each emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, and/or reporting requirements to ensure compliance with these emission limitations.

f. The installation and operation of systems to continuously monitor and record emissions of NOx and the oxygen content of the exhaust gases may be performed in lieu of continuously monitoring the ratio of water to fuel fire in the turbine and monitoring the nitrogen content of the fuel being fired in the turbine, as required by 40 CFR Part 60.334.

In lieu of the excess emissions reports required under 40 CFR Part 60.334, the permittee shall submit excess and emissions reports for each emissions unit in accordance with this permit.

g. “Full Load” shall be defined as the electrical output at the maximum achievable fuel flow rate to the emissions unit for the ambient and equipment conditions during any operating hour. Any actual electrical output within 10% of the calculated electrical output shall be considered full load.

h. “Start/shutdown operation” or “startup and shutdown operation” occurs when the emissions unit is running at less than 50% of electric output at full load.

i. If the fuel fired in each emissions unit is switched from distillate to natural gas during any operational hour, the permittee shall comply with the distillate oil emission limitation for each such operating hour.

c) Operational Restrictions

(1) The sulfur content of the distillate oil fired in emissions units P001 through P005 shall not exceed 0.3%, by weight.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(D), and OAC rule 3745-31-11 through OAC rule 3745-31-20]

(2) The quantity of distillate oil fired in emissions units P001 through P005, combined, shall not exceed 1,873,239 gallons per rolling, 12-month period.

The permittee may fire a greater quantity of distillate oil than is specified above if the distillate oil contains less than 0.3% sulfur, by weight, and compliance with the annual sulfur dioxide limitation (39.9 tons) is maintained. If distillate oil with a sulfur content less than 0.3% is fired, the permittee shall calculate and record the sulfur dioxide emission rate on a daily basis and use the daily emissions rates to determine the total monthly sulfur dioxide emissions.

[Authority for term: OAC rule 3745-77-07(A)(1), OAC rule 3745-31-05(D), and OAC rule 3745-31-11 through OAC rule 3745-31-20]

(3) To ensure compliance with the annual formaldehyde emission limitation established pursuant to OAC rule 3745-31-05(D), the total operating hours for emissions units P001 through P005, combined, when firing natural gas, shall not exceed 27,155 hours per rolling, 12-month period.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(D)]

(4) The permittee shall only fire natural gas or distillate oil in each emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(D)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall operate and maintain equipment to continuously monitor and record the nitrogen oxides emissions from each emissions unit in units of the applicable standards. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75.

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain records of the following data obtained by the continuous nitrogen oxides monitoring system: ppmvd at 15% oxygen, at full load (as defined in b)(2)g), as a 1-hour average (when firing natural gas and distillate oil), ppmvd at 15% oxygen, as a rolling, 12-month average (when firing natural gas), lbs/hour, 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.

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. 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. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous nitrogen oxides monitoring system designed to ensure continuous valid and representative readings of nitrogen oxides emissions in units of the applicable standards. The plan shall

follow the requirements of 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook documenting activities related to the continuous nitrogen oxides monitoring system must be kept on site and available for inspection during regular office hours.

(2) The permittee shall operate and maintain equipment to continuously monitor and record the percent oxygen in the stack serving each emissions unit when the emissions unit is in operation. 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. The permittee shall record the results of any applicable quality control and quality assurance checks required by 40 CFR Part 75.

(3) The permittee shall operate and maintain equipment to continuously monitor and record the fuel flow to each 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.

(4) The permittee shall monitor and analyze the sulfur content of the fuel being fired in each emissions unit in accordance with 40 CFR Parts 60.334 and 60.335.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(5) The permittee shall maintain records that document the following:

a. the calculated full load for each operating hour;

b. the emissions unit’s actual electrical output for each operating hour;

c. all periods of time when the emissions unit was within 10% of the calculated full load; and

d. all periods of time when the emissions unit was operated at less than 50% of full load.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(6) The permittee shall maintain monthly records that document the following:

a. the total amount of distillate oil fired in each emissions unit in gallons;

b. the total amount of distillate oil fired in emissions units P001 through P005, combined, in gallons;

c. the rolling, 12-month summation of the distillate oil usage for emissions units P001 – P005, combined, in gallons;

d. the total number of hours each emissions unit was in operation and firing natural gas;

e. the total number of hours emissions units P001 through P005 were in operation and firing natural gas;

f. the rolling, 12-month summation of the total number of hours emissions units P001 through P005, combined, were in operation and firing natural gas;

g. the startup and shutdown emissions* for nitrogen oxides, in tons;

h. the total particulate/PM10, carbon monoxide, organic compound, sulfur dioxide, sulfuric acid mist, and formaldehyde emissions* for each emissions unit, in tons;

i. the total particulate/PM10, carbon monoxide, organic compound, sulfur dioxide, sulfuric acid mist, and formaldehyde emissions for emissions units P001 through P005, combined, in tons;

j. the rolling, 12-month summation of the nitrogen oxides (including startup and shutdown emissions) emissions for each emissions unit, in tons; and

k. the rolling, 12-month summation of the particulate/PM10, carbon monoxide, organic compound, sulfur dioxide, sulfuric acid mist, and formaldehyde emissions for emissions units P001 through P005, combined, in tons.

- The permittee shall use the continuous nitrogen oxides monitoring data to determine the nitrogen oxides emissions for these emissions units. During any period when the continuous nitrogen oxides emission monitoring system is not operational, the permittee shall use the appropriate missing data procedures specified in 40 CFR Part 75 to determine the rolling, 12-month nitrogen oxides emissions. The permittee shall use the most recent emission test data or specified emission factor(s) to determine the particulate/PM10, carbon monoxide, organic compound, sulfuric acid mist, and formaldehyde emissions for these emissions units. The permittee shall use the most recent emission test data or fuel flow and sulfur content data to determine the sulfur dioxide emissions for these emissions units.

[Authority for term: OAC rule 3745-77-07(C)(1)]

(7) For each day during which the permittee burns a fuel other than natural gas or distillate oil, the permittee shall maintain a record of the type and quantity of the fuel burned in each emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall submit reports within 1 month following the end of each calendar quarter to the Ohio EPA, Northeast District Office documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of nitrogen oxides values in excess of the applicable emission limitations specified in the terms and conditions of this permit

(15 ppmvd at 15% oxygen (at full load (as defined in b)(2)g), as a 1-hr average and 9 ppmvd at 15% oxygen, as a rolling, 12-month average) when firing natural gas and 42 ppmvd at 15% oxygen (at full load (as defined in b)(2)g), as a 1-hr average) when firing distillate oil).

The reports shall also document any continuous nitrogen oxides and oxygen 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 nitrogen oxides and oxygen analyzers while the emissions unit was on line shall also be included in the quarterly report.

If there are no 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 nitrogen oxides and oxygen analyzers while the emissions unit was on line also shall be included in the quarterly report. The permittee shall submit a summary of the excess emission report pursuant to 40 CFR Part 60.7. The summary shall be submitted to the Ohio EPA, Northeast District Office within 30 days following the end of each calendar quarter in a manner prescribed by the Director.

(2) The permittee shall submit quarterly deviation (excursion) reports to the Ohio EPA, Northeast District Office, that identify the following:

a. any time periods when distillate oil with a sulfur content greater than 0.3%, by weight, was fired in emissions units P001 through P005;

b. all exceedances of the rolling, 12-month distillate oil usage restriction for emissions units P001 through P005, combined, when firing distillate oil with a sulfur content of 0.3%, by weight;

c. all exceedances of the rolling, 12-month operating hour restriction for emissions units P001 through P005, combined, when firing natural gas;

d. each day when a fuel other than natural gas or distillate oil was fired in each emissions unit;

e. all exceedances of the rolling, 12-month nitrogen oxides emission limitation for each emissions unit; and

f. allexceedances of the rolling, 12-month particulate/PM10, carbon monoxide, organic compound, sulfur dioxide, sulfuric acid mist, and formaldehyde emission limitations for emissions units P001 through P005, combined.

The quarterly reports shall be submitted in accordance with the Standard Terms and Condition A.2.c) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f) Testing Requirements

(1) Ongoing compliance with the NO_x emission limitations contained in this permit, 40 CFR Parts 60 and 75, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60 and 40 CFR Part 75.

[40 CFR 60.13]; [40 CFR Part 60, Appendices B & F]; and [40 CFR Part 75]

(2) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitations:

When firing natural gas, particulate/PM10 emissions from each emissions unit shall not exceed 5.0 lbs/hr.

When firing distillate oil, particulate/PM10 emissions from each emissions unit shall not exceed 10.0 lbs/hr.

Particulate/PM10 emissions from emissions units P001 through P005, combined, shall not exceed 75.5 tons per rolling, 12-month period.

Applicable Compliance Methods:

Compliance with the hourly emission limitation when firing natural gas may be determined by multiplying the emission factor of 0.0019 lb/mmBtu by the emissions unit's maximum hourly heat input rate when firing natural gas. The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors Section 3.1, table 3.1-2a (4/00).

Compliance with the hourly emission limitation when firing distillate oil may be determined by multiplying the emission factor of 0.007 lb/mmBtu by the emissions unit's maximum hourly heat input rate when firing distillate oil. The emission factor is based upon the averaged results of the particulate emission testing conducted for each emissions unit on May 19, 2001.

If required, the permittee shall demonstrate compliance with the hourly emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5.

Compliance with the tons per rolling, 12-month period emission limitation shall be demonstrated based upon the emission factors specified above and the record keeping requirements specified in d) above.

[Authority for term: OAC rule 3745-77-07(C)(1)]

b. Emission Limitations:

When firing natural gas, nitrogen oxides emissions from each emissions unit shall not exceed 9 ppmv at 15% oxygen on a dry basis, as a rolling, 12-month average and 15 ppmv at 15% oxygen on a dry basis, at full load, as a 1-hour average.

During startup and shutdown periods, when firing natural gas, nitrogen oxides emissions from each emissions unit shall not exceed 175.0 lbs/hr.

When firing distillate oil, nitrogen oxides emissions from each emissions unit shall not exceed 42 ppmv at 15% oxygen on a dry basis, at full load, as a 1-hour average.

During startup and shutdown periods, when firing distillate oil, nitrogen oxides emissions from each emissions unit shall not exceed 235.0 lbs/hr.

Nitrogen oxides emissions from each emissions unit (including startup and shutdown emissions) shall not exceed 125.9 tons per rolling, 12-month period.

Applicable Compliance Methods:

Compliance with the ppmv emission limitations and the lbs/hr emission limitations while firing natural gas or distillate oil shall be demonstrated based upon the continuous nitrogen oxides emission monitoring system data.

Compliance with the tons per rolling, 12-month period emission limitation shall be demonstrated based upon the continuous nitrogen oxides emission monitoring system data and the record keeping requirements specified in d) above.

c. Emission Limitations:

Carbon monoxide emissions from each emissions unit shall not exceed 83.0 lbs/hr.

Carbon monoxide emissions from emissions units P001 through P005, combined, shall not exceed 499.9 tons per rolling, 12-month period.

Applicable Compliance Methods:

Compliance with the hourly emission limitation when firing natural gas may be determined by multiplying the emission factor of 0.027 lb/mmBtu by the emissions unit's maximum hourly heat input rate when firing natural gas. The emission factor is based upon the averaged results of the carbon monoxide emission testing conducted for each emissions unit in May of 2001.

Compliance with the hourly emission limitation when firing distillate oil may be determined by multiplying the emission factor of 0.004 lb/mmBtu by the emissions unit's maximum hourly heat input rate when firing distillate oil. The emission factor is based upon the averaged results of the carbon monoxide emission testing conducted for each emissions unit in May of 2001.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

Compliance with the tons per rolling, 12-month period emission limitation shall be demonstrated based upon the record keeping requirements specified in d) above.

[Authority for term: OAC rule 3745-77-07(C)(1)]

d. Emission Limitations:

When firing natural gas, organic compound emissions from each emissions unit shall not exceed 10.0 lbs/hr.

When firing distillate oil, organic compound emissions from each emissions unit shall not exceed 11.0 lbs/hr.

Organic compound emissions from emissions units P001 through P005, combined, shall not exceed 122.0 tons per rolling, 12-month period.

Applicable Compliance Methods:

Compliance with the hourly emission limitation when firing natural gas may be determined by multiplying the emission factor of 0.003 lb/mmBtu by the emissions unit's maximum hourly heat input rate when firing natural gas. The emission factor is based upon the averaged results of the organic compound emission testing conducted for each emissions unit on June 14, 2001.

Compliance with the hourly emission limitation when firing distillate oil may be determined by multiplying the emission factor of 0.001 lb/mmBtu by the emissions unit's maximum hourly heat input rate when firing distillate oil. The emission factor is based upon the averaged results of the organic compound emission testing conducted for each emissions unit on June 14, 2001.

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

Compliance with the tons per rolling, 12-month period emission limitation shall be demonstrated based upon the emission factors specified above and the record keeping requirements specified in d) above.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e. Emission Limitations:

When firing natural gas, sulfur dioxide emissions from each emissions unit shall not exceed 0.007 lb/mmBtu, actual heat input.

When firing distillate oil, sulfur dioxide emissions from each emissions unit shall not exceed 0.3 lb/mmBtu, actual heat input.

Sulfur dioxide emissions from emissions units P001 through P005, combined, shall not exceed 39.9 tons per rolling, 12-month period.

Applicable Compliance Methods:

Compliance with the lb/mmBtu emission limitation when firing natural gas may be determined using the emission factor of 0.94S lb/mmBtu (where S equals the percent sulfur in the fuel) and the record keeping requirements specified in d) above. The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.1, Table 3.1-2a (4/00).

Compliance with the lb/mmBtu emission limitation when firing distillate oil may be determined using the emission factor of 1.01S lb/mmBtu (where S equals the percent sulfur in the fuel) and the record keeping requirements specified in d) above. The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.1, Table 3.1-2a (4/00).

Compliance with the lb/mmBtu emission limitations may also be demonstrated based upon the record keeping requirements specified in d) above.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

Compliance with the tons per rolling, 12-month period emission limitation shall be demonstrated based upon the record keeping requirements specified in d) above.

[Authority for term: OAC rule 3745-77-07(C)(1)]

f. Emission Limitations:

When firing distillate oil, sulfuric acid mist emissions from each emissions unit shall not exceed 0.033 lb/mmBtu, actual heat input.

Sulfuric acid mist emissions from emissions units P001 through P005, combined, shall not exceed 4.2 tons per rolling, 12-month period.

Applicable Compliance Methods:

Compliance may be determined by using the emission factor of 0.02 lb/mmBtu. The emission factor is based upon the averaged results of the sulfuric acid mist emission testing conducted for each emissions unit on May 19, 2001.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 8.

Compliance with the tons per rolling, 12-month period emission limitation shall be demonstrated based upon the emission factor specified above and the record keeping requirements specified in d) above.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g. Emission Limitations:

When firing natural gas, formaldehyde emissions from each emissions unit shall not exceed .000713 lb/mmBtu, actual heat input.

Formaldehyde emissions from emissions units P001 through P005, combined, shall not exceed 8.5 tons per rolling, 12-month period.

Applicable Compliance Methods:

Compliance with the lb/mmBtu emission limitation when firing natural gas may be determined by using the emission factor of 0.00071 lb/mmBtu. The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.1, Table 3.1-3 (4/00).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 40 CFR Part 63, Appendix A, Method 320.

Compliance with the tons per rolling, 12-month period emission limitation shall be demonstrated based upon the emission factor specified above and the record keeping requirements specified in d) above.

[Authority for term: OAC rule 3745-77-07(C)(1)]

h. Emission Limitations:

During non-startup and shutdown periods, when firing natural gas, nitrogen oxides emissions from each emissions unit shall not exceed 143.0 lbs/hr.

During non-startup and shutdown periods, when firing distillate oil, nitrogen oxides emissions from each emissions unit shall not exceed 215.0 lbs/hr.

Applicable Compliance Methods:

Compliance with these hourly emission limitations may be demonstrated based upon the continuous nitrogen oxides emission monitoring system data.

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

[Authority for term: OAC rule 3745-77-07(C)(1)]

i. Emission Limitations:

When firing natural gas, sulfur dioxide emissions from each emissions unit shall not exceed 0.6 lb/hr.

When firing distillate oil, sulfur dioxide emissions from each emissions unit shall not exceed 339.0 lbs/hr.

Applicable Compliance Methods:

Compliance with the hourly emission limitation when firing natural gas may be determined by multiplying the emission factor of 0.94S lb/mmBtu (where S equals the percent sulfur in the fuel) by the emissions unit's maximum hourly heat input rate when firing natural gas. The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.1, Table 3.1-2a (4/00). The sulfur content of the fuel may be based upon the record keeping requirements specified in d) above.

Compliance with the hourly emission limitation when firing distillate oil may be determined by multiplying the emission factor of 1.01S lb/mmBtu (where S equals the percent sulfur in the fuel) by the emissions unit's maximum hourly heat input rate when firing distillate oil. The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.1, Table 3.1-2a (4/00). The sulfur content of the fuel may be based upon the record keeping requirements specified in d) above.

If required, the permittee shall demonstrate compliance with these emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

[Authority for term: OAC rule 3745-77-07(C)(1)]

j. Emission Limitation:

When firing natural gas, formaldehyde emissions from each emissions unit shall not exceed 0.617 lb/hr.

Applicable Compliance Method:

This emission limitation was established by multiplying the emission factor of 0.00071 lb/mmBtu by the emissions unit's maximum hourly heat input rate when firing natural gas. The emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.1, Table 3.1-3 (4/00).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 40 CFR Part 63, Appendix A, Method 320.

[Authority for term: OAC rule 3745-77-07(C)(1)]

k. Emission Limitation:

When firing distillate oil, sulfuric acid mist emissions from each emissions unit shall not exceed 35.4 lbs/hr.

Applicable Compliance Method:

Compliance may be determined by multiplying the emission factor of 0.02 lb/mmBtu by the emissions unit's maximum heat input rating when firing distillate oil. The emission factor is based upon the averaged results of the sulfuric acid mist emission testing conducted for each emissions unit on May 19, 2001.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 8.

[Authority for term: OAC rule 3745-77-07(C)(1)]

l. Emission Limitations:

When firing natural gas, visible particulate emissions from any stack serving each emissions unit shall not exceed 10% opacity as a 6-minute average.

When firing distillate oil, visible particulate emissions from any stack serving each emissions unit shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-01(C)(1)]

g) Miscellaneous Requirements

(1) None.

4. Emissions Unit Group -Older CT's: B001, B002,

EU ID	Operations, Property and/or Equipment Description
B001	CT-1A.
B002	CT-1B.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific 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.	OAC rule 3745-17-07(A)	Visible particulate emissions from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-11(B)(4)	Particulate emissions shall not exceed 0.040 lb/mmBtu of actual heat input.
c.	OAC rule 3745-18-06(F)	Sulfur dioxide emissions shall not exceed 0.5 lb/mmBtu of actual heat input.

(2) Additional Terms and Conditions

a. Emissions units B001 and B002 are not currently subject to the requirements specified in 40 CFR Part 60, Subpart GG – Standards of Performance for Stationary Gas Turbines. Emissions units B001 and B002 are exempt from the requirements of 40 CFR Part 60, Subpart GG because B001 and B002 were installed in 1973 prior to the applicability date of October 3, 1977 specified in 40 CFR 60.330(b).

c) Operational Restrictions

(1) The quality of the oil burned in each emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in this permit.

[Authority for term: OAC rule 3745-18-53]

(2) The permittee shall burn only distillate oils in each emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the oil burned in each emissions unit in accordance with either Alternative 1 or Alternative 2 described below:

a. Alternative 1:

For each shipment of oil received for burning in each emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in each emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving each emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in each emissions unit. A representative grab sample of oil does not need to be collected on days when each emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as ASTM methods D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

[Authority for term: OAC rules 3745-18-04(E)(3) and 3745-18-04(I)]

(2) For each day during which the permittee burns a fuel other than distillate oil, the permittee shall maintain a record of the type and quantity of the fuel burned in each emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

(1) The permittee shall notify the Director (Ohio EPA, Northeast District Office) in writing of any record which shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from d)(1) above. The notification shall be submitted to the Director (Ohio EPA, Northeast District Office) within 45 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-03(C)]

(2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than distillate oil was burned in each emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-15-03(C)]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of these terms and conditions shall be determined in accordance with the following methods:

a. <u>Emission Limitation</u>:

Sulfur dioxide emissions shall not exceed 0.5 lb/mmBtu of actual heat input.

<u>Applicable Compliance Method</u>:

Continuous compliance with the allowable sulfur dioxide emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received, or each daily composite sample of the oil burned during each calendar day, meets the limitation.

Sulfur dioxide emissions from liquid fuel samples shall be calculated as follows:

$ER = [(1 \times 10^{6}) / H] \times D \times S \times 1.974$

where:

ER = the emission rate in pounds of sulfur dioxide per MMBtu;

H = the heat content of the liquid fuel in Btu per gallon;

D = the density of the liquid fuel in pounds per gallon; and

S = the decimal fraction of sulfur in the liquid fuel.

[OAC rule 3745-18-04(F)(2)]

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

[OAC rule 3745-18-04(E)]

b. Emission Limitation:

Particulate emissions shall not exceed 0.040 lb/mmBtu of actual heat input.

Applicable Compliance Method:

Compliance may be based upon an emission factor of 0.0043 lb/mmBtu. Said emission factor is published in the US EPA reference document AP-42, Fifth Ed., 'Compilation of Emission Factors', Section 3.1, Table 3.1-2a (4/00).

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Methods 1 through 5 and OAC rule 3745-17-03(B)(10).

[Authority for term: OAC rules 3745-77-07(C)(1) and 3745-17-11(B)(4)]

c. Emission Limitation:

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

Applicable Compliance Method:

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

[Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-17-03(B)(1)(a)]

g) Miscellaneous Requirements

(1) None.