



State of Ohio Environmental Protection Agency

Street Address:

Mailing Address:

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

Lazarus Gov.
Center

**RE: FINAL PERMIT TO INSTALL
AUGLAIZE COUNTY
Application No: 03-3109**

CERTIFIED MAIL

DATE: December 8, 1999

AMP Ohio, St Mary's Peaking Station
Randy Meyer
2600 Airport Drive
Columbus, OH 43219

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Director's action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
DAPC, NWDO



**Permit To Install
Terms and
Conditions**

**Issue Date: December 8, 1999
Effective Date: December 8, 1999**

FINAL PERMIT TO INSTALL 03-3109

Application Number: 03-3109
APS Premise Number: 0306010062
Permit Fee: **\$200**
Name of Facility: AMP Ohio, St Mary's Peaking Station
Person to Contact: Randy Meyer
Address: 2600 Airport Drive
Columbus, OH 43219

Location of proposed air contaminant source(s) [emissions unit(s)]:
**Axe and Cleveland Avenue
St Marys, Ohio**

Description of proposed emissions unit(s):
209MMBTU/HR NG AND #2 OIL FIRED COMBUSTION TURBINE.

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
- b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

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.

4. 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.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. 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).

6. Permit Transfers

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

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities prove to be inadequate or cannot meet applicable standards.

10. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

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

13. Source Operation and Operating Permit Requirements After Completion of

AMP Ohio, St Mary's Peaking Station

PTI Application: **03-3109**

December 8, 1999

Facility ID: **0306010062**

Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

AMP Ohio, St Mary's Peaking Station
 PTI Application: 03-3109
 December 8, 1999

Facility ID: 0306010062

14. Construction Compliance Certification

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

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
NO _x	58.26
CO	12.34
PE	2.66
OC	2.80
SO ₂	8.96

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC Rule 3745-23-06
209 mmBTU/hr Natural Gas and Diesel Fired Turbine	OAC rule 3745-31-05	

Synthetic Minor Restriction

OAC Rule 3745-17-11 (B)(4)

OAC Rule 3745-17-07 (A)(1)-(3)

OAC Rule 3745-18-06 (F)

OAC Rule 3745-21-08

AMP
PTI A₁
December 8, 1999

Emissions Unit ID: **P001**

Applicable Emissions
Limitations/Control Measures

145.9 lbs NO_x/hr

22.9 lbs CO/hr

105.54 lbs SO₂/hr

5.01 lbs OC/hr, 2.80 tons OC/year

8.36 lbs PE/hr, 2.66 tons PE/year

244, 112 mmBTU/rolling 12-month
period

58.26 tons NO_x/rolling 12-month
period

12.34 tons CO/rolling 12-month
period

8.96 tons SO₂/rolling 12-month
period

0.040 lb PE/mm BTU actual heat
input

20% Opacity, except as provided
by rule

0.5 lb SO₂/mmBTU actual heat
input

No numerical limit for CO is
established under this rule

No numerical limit for NO_x is
established under this rule

2. Additional Terms and Conditions

- 2.a** In order to avoid Prevention of Significant Deterioration (PSD) review for NO_x and SO₂ and Title V permitting requirements for NO_x and CO and SO₂, the permitted has decided to limit the potential-to-emit from the emissions unit of this Permit-to-Install by limiting the annual heat input to this emissions unit.

B. Operational Restrictions

1. The maximum annual heat input rate for natural gas and #2 oil employed for this emissions unit shall not exceed 244, 112, based upon a rolling, 12-month summation of the monthly BTU heat input rates for natural gas and #2 oil.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permitted shall not exceed heat input rates for natural gas and #2 oil specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Heat Input Rate (Btu/month)</u>
1	27,120
1-2	54,240
1-3	81,360
1-4	108,480
1-5	125,434
1-6	142,388
1-7	159,342
1-8	179,296
1-9	193,250
1-10	210,204
1-11	227,158
1-12	244,112

After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual heat input limitation shall be based upon a rolling, 12-month summation of the monthly BTU heat input rates.

2. The permitted shall burn only natural gas and/or #2 fuel oil in this emissions unit.

3. The quality of the oil burned in this emissions unit shall meet the following specifications on an "as received" basis:
 - a. A sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.5 pounds sulfur dioxide/mmBtu actual heat input.
 - b. Greater than 137,000 Btu/gallon of oil.

Compliance with the above-mentioned specifications shall be determined by using analytical results provided by the permitted or oil supplier for each shipment of oil.

The permitted shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permitted shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.

C. Monitoring and/or Recordkeeping Requirements

1. For the purpose of demonstrating compliance with the annual heat input restriction and the annual emission limitations, the permitted shall maintain the following monthly records of fuel usage in this emissions unit:
 - a. the type of fuel used (natural gas or #2 oil);
 - b. the total amount of natural gas used (cubic feet);
 - c. the total amount of #2 fuel oil used (gallon);
 - d. the total heat input (mmBTU) per month calculated as follows: for natural gas - mmBTU = ft³ N.G. burned x BTU/ft³, for #2 oil - mmBTU = gallons #2 oil burned x BTU/gallon ;
 - e. the emission rates for NOX, SO₂, CO, PE, and OC for each fuel in tons/month;
 - f. beginning the first month after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the monthly BTU heat input rates;

- g. also, during the first 12 calendar months of operation, the permitted shall record the cumulative emission rate for NO_x, SO₂, and CO for each calendar month; and,
 - h. the total emissions rate for PE and OC in tons per year.
 2. For each shipment of oil received for burning in this emissions unit, the permitted shall maintain records of the total quantity of oil received and the permitted's or oil supplier's analyses for sulfur content and heat content.

D. Reporting Requirements

1. The permitted shall submit, on a quarterly basis, copies of the permitted's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permitted's or oil supplier's analyses shall document the sulfur content (percent) and heat content (Btu/gallon) for each shipment of oil. The following information shall also be included with the copies of the permitted's or oil supplier's analyses:
 - a. the total quantity of oil received in each shipment (gallons);
 - b. the weighted* average sulfur dioxide emission rate (pounds/mmBtu) for the oil received during the calendar month; and,
 - c. the weighted* average heat content (Btu/gallon) of the oil received during the calendar month.

*In proportion to the quantity of oil received in each shipment during the calendar month.

These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the oil shipments received during the previous calendar quarters.

E. Testing Requirements

1. Emission testing requirements

The permitted shall conduct, or have conducted, emissions testing in accordance with the following requirements:

- a. The emissions testing shall be conducted within 6 months after issuance of the permit.
 - b. The emissions testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for NO_x, SO₂, CO, PE, and OC.

- c. The emissions testing in E.1.b. shall be conducted when the unit is using natural gas as fuel and when #2 oil is used as a fuel. If only one fuel is utilized during the first 6 months after issuance of this permit, testing on the alternate fuel shall be conducted as soon as it is utilized for a sufficient period of time to conduct the performance tests.
- d. Results of the emissions test shall be reported in lbs/hr and lbs/mmBTU actual heat input for NO_x, SO₂, CO, PE, and OC.

- e. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s): for NO_x, Method 7/7E of 40 CFR Part 60, Appendix A, for SO₂, Method 6/6C of 40 CFR Part 60, Appendix A, for OC, Method 25/25A of 40 CFR Part 60, Appendix A, for CO, Method 10 of 40 CFR Part 60, Appendix A, and for PE, Method 5 of 40 CFR Part 60, Appendix A.
- f. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permitted shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permitted shall include in the report the operating parameters as required in (F)(1)(c) above.

2. Compliance Methods Requirements:

Compliance with the emission limitation(s) found in the "Air Emissions Summary" of this permit shall be determined in accordance with the following method(s):

a. Emission Limitation:

145.9 lbs NO_x/hr and 58.26 tons/rolling 12-month period

Applicable Compliance Method:

Emissions Unit ID: P001

The permitted shall demonstrate compliance with the hourly emissions limitation based on the results of the stack test required in section E.1. Compliance with the tons/rolling 12 month period limit will be determined by multiplying the heat input of the fuel used by the emission factor established during the stack test. The recordkeeping requirements in section C.1. shall be sufficient to determine compliance with this limit.

b. Emission Limitation:

22.9 lb CO/hr and 12.34 tons/rolling 12-month period

Applicable Compliance Method:

The permitted shall demonstrate compliance with the hourly emissions limitation based on the results of the stack test required in section E.1. Compliance with the tons/rolling 12 month period limit will be determined by multiplying the heat input of the fuel used by the emission factor established during the stack test. The recordkeeping requirements in section C.1. shall be sufficient to determine compliance with this limit.

c. Emission Limitation:

105.54 lbs SO₂/hr and 8.96 tons/rolling 12-month period, 0.5 lb SO₂/mmBTU actual heat input

Applicable Compliance Method:

The permitted shall demonstrate compliance with the hourly emissions limitation based on the results of the stack test required in section E.1. Compliance with the tons/rolling 12 month period limit will be determined by multiplying the heat input of the fuel used by the emission factor established during the stack test. The recordkeeping requirements in section C.1. shall be sufficient to determine compliance with this limit.

d. Emission Limitation:

8.36 lb PE/hr and 2.66 TPY, 0.040 lb PE/mm BTU actual heat input

Applicable Compliance Method:

The permitted shall demonstrate compliance with the emissions limitation based on the results of the stack test required in section E.1. Compliance with the TPY limit will be determined by multiplying the heat input of the fuel used by the emission factor established during the stack test. The recordkeeping requirements in section C.1. shall be sufficient to

determine compliance with this limit.

e. Emission Limitation:

5.01 lb OC/hr and 2.80 TPY

Applicable Compliance Method:

The permitted shall demonstrate compliance with the emissions limitation based on the results of the stack test required in section E.1. Compliance with the TPY limit will be determined by multiplying the heat input of the fuel used by the emission factor established during the stack test. The recordkeeping requirements in section C.1. shall be sufficient to determine compliance with this limit.

f. Emission Limitation:

20% opacity, except as provided by rule

Applicable Compliance Method:

OAC rule 3745-17-03(B)(1)

F. Miscellaneous Requirements

Terms A.2., B.1., and C.1. are federally enforceable.