



4/8/2014

Certified Mail

Mr. Robert Jessee
Waterford Plant
201 Righteous Ridge Road
Waterford, OH 45786

Facility ID: 0684000213
Permit Number: P0091005
County: Washington

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Initial

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Marietta Times. A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Southeast District Office at (740)385-8501.

Sincerely,

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

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

PUBLIC NOTICE
4/8/2014 Issuance of Draft Air Pollution Title V Permit

Waterford Plant
201 Righteous Ridge Road,
Waterford, OH 45786
Washington County

FACILITY DESC.: Fossil Fuel Electric Power Generation
PERMIT #: P0091005
PERMIT TYPE: Initial
PERMIT DESC: Initial Title V permit for a natural gas-fired combined cycle power plant: facility consists of a gas-fired boiler, three (3) combined cycle turbines with SCR, cooling towers, emergency generator, fire pump, gas heater and roadways and parking areas.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitonline.aspx> by entering the permit # or: Jessica Kelley, Ohio EPA DAPC, Southeast District Office, 2195 Front Street, Logan, OH 43138. Ph: (740)385-8501



Statement of Basis For Air Pollution Title V Permit

Facility ID:	0684000213
Facility Name:	Ohio Power Company – Waterford Plant
Facility Description:	Natural gas fired combined cycle power plant.
Facility Address:	201 Righteous Ridge Road, Waterford, OH 45786
Permit #:	P0091005, Initial Title V

This facility is subject to Title V because it is major for:

Lead
 Sulfur Dioxide
 Carbon Monoxide
 Volatile Organic Compounds
 Nitrogen Oxides
 Particulate Matter ≤ 10 microns
 Single Hazardous Air Pollutant
 Combined Hazardous Air Pollutants
 Maximum Available Control Technology Standard(s)
 GHG
 Title IV

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A



Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	N/A

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2	N	40 CFR 63	negative declaration for 40 CFR Part 63, Subpart YYYY
B.3	25	N	emission control action programs
B.4	77	40 CFR 70	insignificant emissions units
B.5.	OAC rule 3745-109	N	State CAIR rule

C. Emissions Unit Terms and Conditions

Key: EU = emissions unit ID ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit) OR = operational restriction M = monitoring requirements ENF = did noncompliance issues drive the monitoring requirements?	R = record keeping requirements Rp = reporting requirements ET = emission testing requirements (not including compliance method terms) St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement Misc = miscellaneous requirements
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EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
B001	NOx - 0.036 lb/MMBtu actual heat input, 3.07 lbs/hr, and 13.4 tons/yr	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. EG #65 - CAM is not applicable.
B001	SO2 - 0.000584 lb/MMBtu actual heat input, 0.050 lb/hr, and 0.22 ton/yr	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. EG #65 - CAM is not applicable.
B001	CO - 0.074 lb/MMBtu actual heat input, 6.30 lbs/hr, and 27.6 tons/yr	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													All limits from PTI 06-06739
													content restriction. EG #65 - CAM is not applicable.
B001	VOC - 0.0041 lb/MMBtu actual heat input, 0.35 lb/hr, and 1.53 tons/yr	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	N	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. EG #65 - CAM is not applicable.
B001	PE - 0.005 lb/MMBtu actual heat input, 0.43 lb/hr, and 1.87 tons/yr	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	N	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. EG #65 - CAM is not applicable.
B001	ton(s) per rolling 12-month period: Nox - 13.4	N	OAC rules 3745-31-05(D)	N	Y	Y	N	Y	Y	N	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	SO2 - 0.22 PE - 1.87 CO - 27.6 VOC - 1.53												All limits from PTI 06-06739
	SO2 - 0.22 PE - 1.87 CO - 27.6 VOC - 1.53												the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. EG #65 - CAM is not applicable.
B001	VPE - 20% opacity as a 6-min. avg.	OAC rule 3745-17-07(A)	N	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. EG #65 - CAM is not applicable.
B001	PE/SO2	OAC rule 3745-17-10(B)/18-06	Subpart Dc	Y	N	N	N	N	N	N	N	N	ND - The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
P001 through P003 - WITHOUT DUCT BURNER FIRING	NOx - 3.5 ppmvd at 15% oxygen, 25.0 lbs/hr, and 146.9 tons/yr, including start-up and	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	shutdown emissions												All limits from PTI 06-06739 this emissions unit. Heat input restriction. Sulfur content restriction. Start-up/shutdown restrictions. EG #65 - CAM is not applicable.
P001 through P003 - WITHOUT DUCT BURNER FIRING	PE - 21.0 lbs/hr and 100.0 tons/yr	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. Start-up/shutdown restrictions. EG #65 - CAM is not applicable.
P001 through P003 - WITHOUT DUCT BURNER FIRING	SO2 - 12.0 lbs/hr and 56.6 tons/yr	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. Start-up/shutdown restrictions. EG #65 - CAM is not applicable.



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P001 through P003 - WITHOUT DUCT BURNER FIRING	CO - 9.0 ppmvd, 33.0 lbs/hr, and 366.6 tons/yr, including start-up and shutdown emissions	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. Start-up/shutdown restrictions. EG #65 - CAM is not applicable.
P001 through P003 - WITHOUT DUCT BURNER FIRING	VOC - 3.2 lbs/hr and 31.8 tons/yr, including start-up and shutdown emissions	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. Start-up/shutdown restrictions. EG #65 - CAM is not applicable.
P001 through P003 - WITHOUT DUCT BURNER FIRING	NH3 - 26.0 lbs/hr and 123.1 tons/yr	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													All limits from PTI 06-06739
													this emissions unit. Heat input restriction. Sulfur content restriction. Start-up/shutdown restrictions. EG #65 - CAM is not applicable.
P001 through P003 - WITHOUT DUCT BURNER FIRING	Formaldehyde emissions shall not exceed 0.23 lb/hr and 1.06 tons/yr	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. Start-up/shutdown restrictions. EG #65 - CAM is not applicable.
P001 through P003 - WITHOUT DUCT BURNER FIRING	H2SO4 - 0.48 lb/hr and 2.3 tons/yr	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. Start-up/shutdown restrictions. EG #65 - CAM is not applicable.



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P001 through P003 - WITHOUT DUCT BURNER FIRING	VPE - 10% opacity as a 6-min. avg.	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	All limits from PTI 06-06739 ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. Start-up/shutdown restrictions.
P001 through P003 - WITHOUT DUCT BURNER FIRING	tons per rolling 12-month period: Nox - 54.4 SO2 - 10.2 PE - 15.3 CO - 28.1 VOC - 2.7	OAC rule 3745-31-10 through 3745-31-20	40 CFR Part 52.21	N	Y	Y	N	Y	Y	N	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. EG #65 - CAM is not applicable.
P001 through P003 - WITHOUT DUCT BURNER FIRING	NOx/SO2	N	Part 60, Subpart GG	Y	N	N	N	N	N	N	N	N	ND - The emission limitations specified in this applicable rule are equivalent to or less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3). Except as provided for in the terms and conditions in this permit,



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													All limits from PTI 06-06739
													the permittee is not exempt from meeting any additional requirements of 40 CFR Part 60, Subpart GG.
P001 through P003 - WITHOUT DUCT BURNER FIRING	VPE/PE/SO2	OAC Rule 3745-17-07(A)/17-11(B)/18-06(F)		Y	N	N	N	N	N	N	N	N	ND - The emission limitations specified in these applicable rules are equivalent to or less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
P001 through P003 - WITH DUCT BURNER FIRING	NOx - 3.5 ppmvd at 15% oxygen, 30.0 lbs/hr, and 146.9 tons/yr, including start-up and shutdown emissions	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. Start-up/shutdown restrictions. EG #65 - CAM is not applicable - SCR used for NOx control; however, Part 75 monitoring system in use.
P001 through P003 - WITH DUCT BURNER FIRING	PE - 25.0 lbs/hr and 100.0 tons/yr	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													All limits from PTI 06-06739
													the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. Start-up/shutdown restrictions. EG #65 - CAM is not applicable - no PE control equipment.
P001 through P003 - WITH DUCT BURNER FIRING	SO2 - 14.0 lbs/hr and 56.6 tons/yr	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. Start-up/shutdown restrictions. EG #65 - CAM is not applicable.
P001 through P003 - WITH DUCT BURNER FIRING	CO - 15.0 ppmvd, 69.0 lbs/hr, and 366.6 tons/yr, including start-up and shutdown emissions	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. Start-up/shutdown restrictions.



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													All limits from PTI 06-06739
													EG #65 - CAM is not applicable - no CO control equipment.
P001 through P003 - WITH DUCT BURNER FIRING	VOC - 6.8 lbs/hr and 31.8 tons/yr, including start-up and shutdown emissions	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. Start-up/shutdown restrictions. EG #65 - CAM is not applicable.
P001 through P003 - WITH DUCT BURNER FIRING	NH3 - 30.6 lbs/hr and 123.1 tons/yr	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. Start-up/shutdown restrictions. EG #65 - CAM is not applicable.
P001 through P003 - WITH DUCT BURNER	Formaldehyde emissions shall not	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean'



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													All limits from PTI 06-06739
FIRING	exceed 0.26 lb/hr and 1.06 tons/yr												fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. Start-up/shutdown restrictions. EG #65 - CAM is not applicable.
P001 through P003 - WITH DUCT BURNER FIRING	H2SO4 - 0.56 lb/hr and 2.3 tons/yr	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. Start-up/shutdown restrictions. EG #65 - CAM is not applicable.
P001 through P003 - WITH DUCT BURNER FIRING	VPE - 10% opacity as a 6-min. avg.	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. Start-



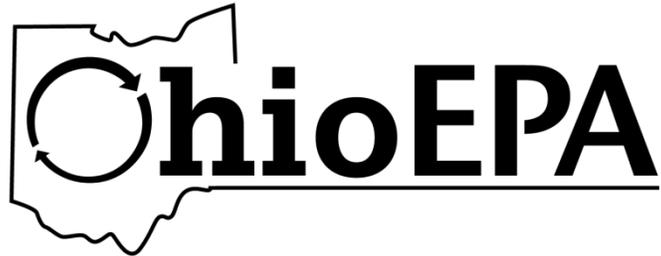
EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													All limits from PTI 06-06739
													up/shutdown restrictions.
P001 through P003 - WITH DUCT BURNER FIRING	tons per rolling 12-month period: Nox - 146.9 SO2 - 56.6 PE - 100.0 CO - 366.6 VOC - 31.8	OAC rule 3745-31-10 through 3745-31-20	40 CFR Part 52.21	N	Y	Y	N	Y	Y	N	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. EG #65 - CAM is not applicable.
P001 through P003 - WITH DUCT BURNER FIRING	NOx/PE/SO2	N	Part 60, Subpart GG	Y	N	N	N	N	N	N	N	N	ND - The emission limitations specified in this applicable rule are equivalent to or less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3). Except as provided for in the terms and conditions in this permit, the permittee is not exempt from meeting any additional requirements of 40 CFR Part 60, Subpart GG.
P001 through P003 - WITH DUCT BURNER FIRING	VPE/PE/SO2	OAC Rule 3745-17-07(A)/17-11(B)/18-06(F)	Part 60, Subpart Da	Y	N	N	N	N	N	N	N	N	ND - The emission limitations specified in these applicable rules are equivalent to or less stringent than the emission



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													All limits from PTI 06-06739
													limitations established pursuant to OAC rule 3745-31-05(A)(3).
P001 through P003 - START-UP/SHUTDOWN LIMITS	NOx -418 lbs/cycle and 27.4 tons/yr	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. EG #65 - CAM is not applicable.
P001 through P003 - START-UP/SHUTDOWN LIMITS	CO - 1127 lbs/cycle and 150.1 tons/yr	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. EG #65 - CAM is not applicable.
P001 through P003 - START-UP/SHUTDOWN LIMITS	vOC - 97 lbs/cycle and 10.6 tons/yr	N	OAC rule 3745-31-05	N	Y	Y	N	Y	Y	Y	N	N	ORs - The permittee shall burn only natural gas, or other such 'inherently clean' fuel that would result in emissions that comply with



EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													All limits from PTI 06-06739
													the limitations and restrictions of this permit, in this emissions unit. Heat input restriction. Sulfur content restriction. EG #65 - CAM is not applicable.
P004	PE -1.59 lbs/hr and 7.0 tons/yr	OAC rule 3745-31-10 through 3745-31-20	40 CFR Part 52.21	N	Y	Y	N	Y	Y	Y	N	N	OR - The permittee shall maintain an average total dissolved solids (TDS) content of 3,000 ppm or less in the circulating cooling water. EG #65 - CAM is not applicable.
P004	VPE - 20% opacity as a 6-min. avg.	OAC Rule 3745-17-07(A)		N	Y	Y	N	Y	Y	Y	N	N	OR - The permittee shall maintain an average total dissolved solids (TDS) content of 3,000 ppm or less in the circulating cooling water. EG #65 - CAM is not applicable
P004	PE	OAC Rule 3745-17-11(B)		Y	N	N	N	N	N	N	N	N	ND - The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).



DRAFT

**Division of Air Pollution Control
Title V Permit
for
Waterford Plant**

Facility ID:	0684000213
Permit Number:	P0091005
Permit Type:	Initial
Issued:	4/8/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Waterford Plant

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Draft Title V Permit
Waterford Plant
Permit Number: P0091005
Facility ID: 0684000213

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0684000213
Facility Description: Natural gas fired simple/combined cycle power plant.
Application Number(s): A0022342, A0022343, A0049924
Permit Number: P0091005
Permit Description: Initial Title V permit for a natural gas-fired combined cycle power plant: facility consists of a gas-fired boiler, three (3) combined cycle turbines with SCR, cooling towers, emergency generator, fire pump, gas heater and roadways and parking areas.
Permit Type: Initial
Issue Date: 4/8/2014
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number:

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

Waterford Plant
201 Righteous Ridge Road
Waterford, OH 45786

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

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

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, Southeast 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
Director



Draft Title V Permit
Waterford Plant
Permit Number: P0091005
Facility ID: 0684000213
Effective Date: To be entered upon final issuance

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 recordings for 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 submitted scheduled 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, Southeast 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, Southeast 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, Southeast 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 permit except 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, Southeast 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, Southeast 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 intermittent consistent 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, Southeast 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, Southeast 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, no emissions unit identified in this permit that has been certified 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 Requirements Under 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 the Ohio EPA DAPC, Southeast 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, Southeast 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 Requirements Under 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, Southeast 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, Southeast 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 of an 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, Southeast 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.



Draft Title V Permit
Waterford Plant
Permit Number: P0091005
Facility ID: 0684000213
Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



Effective Date: To be entered upon final issuance

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 emissions units contained in this permit are subject to 40 CFR Part 60, Subpart GG: P001, P002 and P003. The complete NSPS requirements may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District Office or local air agency.
3. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subpart Da: P001, P002 and P003. The complete NSPS requirements may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://ecfr.gpoaccess.gov> or by contacting the appropriate Ohio EPA District Office or local air agency.
4. The stationary combustion turbines identified in Section C. of this permit (emissions units P001 through P003) are not subject to the requirements of 40 CFR Part 63, Subpart YYYY (National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines) because they are not located at a major source of hazardous air pollutant emissions.

[Authority for term: OAC rule 3745-77-07(F)(2)]

5. This 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.

[Authority for term: OAC rule 3745-25-03]

6. The following insignificant emissions units located at this facility are exempt from permit requirements because they are not subject to any applicable requirements (as defined in OAC rule 3745-77-01(H)) or because they meet the "de minimis" criteria established in OAC rule 3745-15-05:

EU ID	Operations, Property and/or Equipment Description
P008	Roadways/parking areas(OAC rule 3745-15-05) (OAC rule 3745-15-05)
P010	Two-cell blowdown cooling tower(OAC rule 3745-15-05) (OAC rule 3745-15-05)

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit.

7. 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 as outlined in the permit application submitted as required by OAC rules 3745-109-03, 109-10 and 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)]

- 8. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within a permit-to-install for that emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-by-rule, permit-to-install or in the federally-approved versions of OAC Chapters 3745-17, 3745-18, and/or 3745-21.

EU ID	Operations, Property and/or Equipment Description
P006	1502 hp/1000 kW Emergency Diesel Fuel Fired Generator (PBR11159)
P007	350 kW Emergency Diesel Fuel fired Water Pump (PBR11160)
P009	9.3 MMBtu/hr gas heater (OAC rule 3745-17)



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Waterford Plant
Permit Number: P0091005
Facility ID: 0684000213
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C. Emissions Unit Terms and Conditions



1. B001, Auxiliary Boiler

Operations, Property and/or Equipment Description:

85.2 MMBtu/hr natural gas fired auxiliary boiler designed to provide quick start capability of the facility, providing steam to the steam turbine seals.

- 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 3745-31-05(A)(3) (PTI #06-06739 as issued 03/20/2007)	Nitrogen oxides (NO _x) emissions shall not exceed 0.036 lb/MMBtu actual heat input, 3.07 lbs/hr, and 13.4 tons/yr. Sulfur dioxide (SO ₂) emissions shall not exceed 0.000584 lb/MMBtu actual heat input, 0.050 lb/hr, and 0.22 ton/yr. Carbon monoxide (CO) emissions shall not exceed 0.074 lb/MMBtu actual heat input, 6.30 lbs/hr, and 27.6 tons/yr. Volatile organic compound (VOC) emissions shall not exceed 0.0041 lb/MMBtu actual heat input, 0.35 lb/hr, and 1.53 tons/yr. Particulate emissions (PE) shall not exceed 0.005 lb/MMBtu actual heat input, 0.43 lb/hr, and 1.87 tons/yr. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A) and 3745-31-10 through 3745-31-20. See c)(1) below.
b.	OAC rules 3745-31-05(D)	NO _x emissions shall not exceed 13.4



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		tons per rolling 12-month period. SO ₂ emissions shall not exceed 0.22 ton per rolling, 12-month period. PE emissions shall not exceed 1.87 tons per rolling, 12-month period. CO emissions shall not exceed 27.6 tons per rolling, 12-month period. VOC emissions shall not exceed 1.53 tons per rolling, 12-month period.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
d.	40 CFR Part 60, Subpart Dc, OAC rule 3745-18-06(A), and OAC rule 3745-17-10(B)(1)	The emission limitations specified by these rules are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit. The maximum sulfur content of the natural gas shall not exceed 2 grains per 100 standard cubic feet.

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(1), and 3745-77-07(A)(3)(a)(ii)]

(2) The maximum hourly fuel heat input for this emissions unit shall not exceed 85.2 MMBtu.

[*Authority for term:* OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall comply with the applicable with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart Dc, including the following sections:

60.48c(a)	Notification of the date of construction, reconstruction and start-up.
60.48c(j)	Report submission timeframes.



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60.48c(g)(1)	Record amount of fuel burned each operating day.
60.48c(g)(2)	Record amount of fuel burned each calendar month.
60.48c(g)(3)	Record amount of fuel delivered each calendar month.
60.48c(i)	Affected records shall be maintained for 2 years.

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

[*Authority for term:*OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(a)(ii), and 3745-77-07(C)(1)]

- (3) The permittee shall monitor the sulfur content and gross calorific value of the fuel being fired in the emissions unit. Fuel sampling and analysis shall be conducted according to the procedures and at the frequency specified by 40 CFR Part 75, Appendix D.

[*Authority for term:*OAC rules 3745-77-07(A)(3)(a), 3745-77-07(C)(1), and 40 CFR Part 75]

- (4) The permittee shall maintain hourly records of the fuel quantity used (cubic feet) and the heat input (MMBtu/hr) for this emissions unit.

[*Authority for term:*OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(a), and 3745-77-07(C)(1)]

- (5) The permittee shall maintain monthly records of the rolling, 12-month summations of the NO_x, SO₂, PE, CO, and VOC emissions for this emissions unit, in tons.

[*Authority for term:*OAC rules 3745-31-05(C), 3745-77-07(A)(3)(a), and 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall comply with the applicable with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart Dc, including the following sections:

60.48c(j)	Reporting period for required reports under this subpart is every six-month time period.
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- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.



[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(b), and 3745-77-07(C)(1)]

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. any record which shows that the sulfur content of the natural gas exceeded 2 grains per 100 standard cubic feet; and
 - b. alleceedances of the rolling, 12-month emission limitations for NO_x, SO₂, PE, CO, and VOC.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-31-05(C), 3745-77-07(A)(3)(b), and 3745-77-07(C)(1)]

- (4) The permittee shall also submit annual reports that specify the total NO_x, SO₂, PE, CO, and VOC emissions from this emissions unit for the previous calendar year. The annual reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(b), and 3745-77-07(C)(1)]

f) **Testing Requirements**

- (1) **Emissions Limitations:**

NO_x emissions shall not exceed 0.036 lb/MMBtu, 3.07 lbs/hr, and 13.4 tons/yr.

Applicable Compliance Methods:

Compliance with the lb/MMBtu emission limitation may be demonstrated using the emission factor supplied by the permittee (0.036 lb of NO_x /MMBtu).

Compliance with the lbs/hr emission limitation may be demonstrated by multiplying the permittee-supplied NO_x emission factor (0.036 lb of NO_x /MMBtu) by the actual fuel heat input rate (MMBtu/hr).

Compliance with the tons/yr emission limitation shall be demonstrated by multiplying the permittee-supplied NO_x emission factor (0.036 lb of NO_x/MMBtu) or emissions unit-specific NO_x emission factor established through emission testing by the actual fuel heat input (MMBtu/yr) and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/MMBtu and lbs/hr 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 rules 3745-31-05(A)(3), 3745-77-07(A)(3)(a), and 3745-77-07(C)(1)]

(2) Emission Limitations:

SO₂ emissions shall not exceed 0.000584 lb/MMBtu, 0.050 lb/hr, and 0.22 ton/yr.

Applicable Compliance Methods:

Compliance with the lb/MMBtu emission limitation may be demonstrated using the following AP-42 emission factor: 0.000584 lb of SO₂ /MMBtu (AP-42, Fifth Edition, Section 1.4, Table 1.4-2, 7/98).

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the AP-42 emission factor (0.000584 lb of SO₂ /MMBtu) by the actual fuel heat input rate (MMBtu/hr).

Compliance with the ton/yr emission limitation shall be demonstrated by multiplying the AP-42 SO₂ emission factor (0.000584 lbSO₂/MMBtu) or emissions unit-specific SO₂ emission factor established through emission testing by the actual fuel heat input (MMBtu/yr) and dividing by 2000 lbs/ton.

If required, the permittee shall demonstrate compliance with the lb/MMBtu and lb/hr 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 rules 3745-31-05(A)(3), 3745-77-07(A)(3)(a), and 3745-77-07(C)(1)]

(3) Emission Limitations:

CO emissions shall not exceed 0.074 lb/MMBtu, 6.30 lbs/hr, and 27.6 tons/yr.

Applicable Compliance Methods:

Compliance with the lb/MMBtu emission limitation may be demonstrated using the emission factor supplied by the permittee (0.074 lb of CO/MMBtu).

Compliance with the lbs/hr emission limitation may be demonstrated by multiplying the permittee-supplied CO emission factor (0.074 lb of CO/MMBtu) by the actual fuel heat input rate (MMBtu/hr).

Compliance with the tons/yr emission limitation shall be demonstrated by multiplying the permittee-supplied CO emission factor (0.074 lb of CO/MMBtu) or emissions unit-specific CO emission factor established through emission testing by the actual fuel heat input (MMBtu/yr) and dividing by 2000 lbs/ton.



- (4) If required, the permittee shall demonstrate compliance with the lb/MMBtu and lbs/hr emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(a), and 3745-77-07(C)(1)]

- (5) Emission Limitations:

VOC emissions shall not exceed 0.0041 lb/MMBtu, 0.35 lb/hr, and 1.53 tons/yr.

Applicable Compliance Methods:

Compliance with the lb/MMBtu emission limitation may be demonstrated using the emission factor supplied by the permittee (0.0041 lb of VOC /MMBtu).

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the permittee-supplied VOC emission factor (0.0041 lb of VOC /MMBtu) by the actual fuel heat input rate (MMBtu/hr).

Compliance with the tons/yr emission limitation shall be demonstrated by multiplying the permittee-supplied VOC emission factor (0.0041 lb of VOC /MMBtu) or emissions unit-specific VOC emission factor established through emission testing by the actual fuel heat input (MMBtu/yr) and dividing by 2000 lbs/ton.

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

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(a), and 3745-77-07(C)(1)]

- (6) Emission Limitations:

PE emissions shall not exceed 0.005 lb/MMBtu, 0.43 lb/hr, and 1.87 tons/yr.

Applicable Compliance Methods:

Compliance with the lb/MMBtu emission limitation may be demonstrated using the emission factor supplied by the permittee (0.005 lb of PE /MMBtu).

Compliance with the lb/hr emission limitation may be demonstrated by multiplying the permittee-supplied PE emission factor (0.005 lb of PE /MMBtu) by the actual fuel heat input rate (MMBtu/hr).

Compliance with the tons/yr emission limitation shall be demonstrated by multiplying the permittee-supplied PE emission factor (0.005 lb of PE /MMBtu) or emissions unit-specific PE emission factor established through emission testing by the actual fuel heat input (MMBtu/yr) and dividing by 2000 lbs/ton.



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

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(a), and 3745-77-07(C)(1)]

(7) Emission Limitations:

NO_x emissions shall not exceed 13.4 tons per rolling, 12-month period.
SO₂ emissions shall not exceed 0.22 ton per rolling, 12-month period.
PE shall not exceed 1.87 tons per rolling, 12-month period.
CO emissions shall not exceed 27.6 tons per rolling, 12-month period.
VOC emissions shall not exceed 1.53 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by multiplying the hourly emission rate by the total number of hours operated per twelve month rolling period, and dividing by 2000 lbs/ton.

[*Authority for term:* OAC rules 3745-31-05 and 3745-77-07(C)(1)]

(8) Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(a), and 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.



2. Emissions Unit Group – Natural Gas Fired Combustion Turbines: P001, P002, P003,

EU ID	Operations, Property and/or Equipment Description
P001	360 MMBtu/hrGE 7FA Natural Gas Fired Dry Low NOx (DLN) Combustion Turbine No. 1 with selective catalytic reduction.
P002	360 MMBtu/hrGE 7FA Natural Gas Fired Dry Low NOx (DLN) Combustion Turbine No. 2 with selective catalytic reduction.
P003	360 MMBtu/hrGE 7FA Natural Gas Fired Dry Low NOx (DLN) Combustion Turbine No. 3 with selective catalytic reduction.

Operations, Property and/or Equipment Description:

- 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) d)(10)-(12).
- 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 3745-31-05(A)(3) (PTI #06-06739 as issued 03/20/2007)	<p>EMISSION LIMITATIONS WITHOUT DUCT BURNER FIRING</p> <p>Nitrogen oxides (NOx) emissions shall not exceed 3.5 ppmvd at 15% oxygen, 25.0 lbs/hr, and 146.9 tons/yr, including start-up and shutdown emissions.</p> <p>Particulate emissions (PE) shall not exceed 21.0 lbs/hr and 100.0 tons/yr.</p> <p>Sulfur dioxide (SO₂) emissions shall not exceed 12.0 lbs/hr and 56.6 tons/yr.</p> <p>Carbon monoxide (CO) emissions shall not exceed 9.0 ppmvd, 33.0 lbs/hr, and 366.6 tons/yr, including start-up and shutdown emissions.</p> <p>Volatile organic compound (VOC) emissions shall not exceed 3.2 lbs/hr and</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>31.8 tons/yr, including start-up and shutdown emissions.</p> <p>Ammonia (NH₃) emissions shall not exceed 26.0 lbs/hr and 123.1 tons/yr.</p> <p>Formaldehyde emissions shall not exceed 0.23 lb/hr and 1.06 tons/yr.</p> <p>Sulfuric acid emissions shall not exceed 0.48 lb/hr and 2.3 tons/yr.</p> <p>Visible particulate emissions from any stack shall not exceed 10% opacity as a 6-minute average.</p> <p>See c)(1) and c)(3) below.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart GG, and OAC rules 3745-31-10 through 3745-31-20.</p>
b.	OAC rules 3745-31-10 through 3745-31-20	<p>NOx emissions shall not exceed 146.9 tons per rolling, 12-month period.</p> <p>SO₂ emissions shall not exceed 56.5 tons per rolling, 12-month period.</p> <p>PE emissions shall not exceed 100.0 tons per rolling, 12-month period.</p> <p>CO emissions shall not exceed 366.6 tons per rolling, 12-month period.</p> <p>VOC emissions shall not exceed 31.8 tons per rolling, 12-month period.</p>
c.	40 CFR Part 60, Subpart GG	<p>The emission limitations specified in this applicable rule are equivalent to or less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3). Except as provided for in the terms and conditions in this permit, the permittee is not exempt from meeting any additional requirements of 40 CFR Part 60, Subpart GG.</p>
d.	OAC rule 3745-17-07(A), OAC rule 3745-17-11(B)(4), and	<p>The emission limitations specified in these applicable rules are equivalent to or</p>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-18-06(F)	less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-31-05(A)(3) (PTI #06-06739 as issued 03/20/2007)	<p>EMISSION LIMITATIONS WITH DUCT BURNER FIRING</p> <p>NOx emissions shall not exceed 3.5 ppmvd at 15% oxygen, 30.0 lbs/hr, and 146.9 tons/yr, including start-up and shutdown emissions.</p> <p>PE shall not exceed 25.0 lbs/hr and 100.0 tons/yr.</p> <p>SO₂ emissions shall not exceed 14.0 lbs/hr and 56.6 tons/yr.</p> <p>CO emissions shall not exceed 15.0 ppmvd, 69.0 lbs/hr, and 366.6 tons/yr, including start-up and shutdown emissions.</p> <p>VOC emissions shall not exceed 6.8 lbs/hr and 31.8 tons/yr, including start-up and shutdown emissions.</p> <p>NH3 emissions shall not exceed 30.6 lbs/hr and 123.1 tons/yr.</p> <p>Formaldehyde emissions shall not exceed 0.26 lb/hr and 1.06 tons/yr.</p> <p>Sulfuric acid emissions shall not exceed 0.56 lb/hr and 2.3 tons/yr.</p> <p>Visible particulate emissions from any stack shall not exceed 10% opacity as a 6-minute average.</p> <p>See c)(2) and c)(4) below.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subparts Da and GG, and OAC rules 3745-31-10 through 3745-31-20.</p>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
f.	OAC rules 3745-31-10 through 3745-31-20	<p>NOx emissions shall not exceed 146.9 tons per rolling, 12-month period.</p> <p>SO₂ emissions shall not exceed 56.6 tons per rolling, 12-month period.</p> <p>PE emissions shall not exceed 100.0 tons per rolling, 12-month period.</p> <p>CO emissions shall not exceed 366.6 tons per rolling, 12-month period.</p> <p>VOC emissions shall not exceed 31.8 tons per rolling, 12-month period.</p>
g.	40 CFR Part 60, Subpart GG	The emission limitations specified in this applicable rule are equivalent to or less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3). Except as provided for in the terms and conditions in this permit, the permittee is not exempt from meeting any additional requirements of 40 CFR Part 60, Subpart GG.
h.	40 CFR Part 60, Subpart Da, OAC rule 3745-18-06(F), OAC rule 3745-17-11 (B)(4), and OAC rule 3745-17-07(A)	The emission limitations specified in these applicable rules are equivalent to or less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).
i.	OAC rule 3745-31-05(A)(3) (PTI #06-06739 as issued 03/20/2007)	<p>START-UP AND SHUTDOWN EMISSION LIMITATIONS See c)(3) below.</p> <p>NOx emissions shall not exceed 418 lbs/cycle and 27.4 tons/yr.</p> <p>CO emissions shall not exceed 1127 lbs/cycle and 150.1 tons/yr.</p> <p>VOC emissions shall not exceed 97 lbs/cycle and 10.6 tons/yr.</p>

(2) Additional Terms and Conditions

- a. If the permittee is subject to the requirements of OAC Chapter 103 and 40 CFR Parts 72 and 75 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 rules 3745-77-07(A)(5) and 3745-77-07(C)(1)]

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

[Authority for term: OAC rules 3745-77-07(A)(3)(c) and 3745-77-07(C)(1)]

- c. The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

[40 CFR 60.2] and/or [40 CFR 63.2] and [Appendix F to 40 CFR Part 60]

- d. The permittee shall maintain a written quality assurance/quality control plan for the continuous CO₂ monitoring system, designed to ensure continuous valid and representative readings of CO₂ emissions in units of the applicable standard(s). Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous CO₂ monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous CO₂ monitoring system in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits pursuant to 40 CFR Part 60, and linearity checks pursuant to 40 CFR Part 75; however, linearity checks completed pursuant to 40 CFR Part 75, Appendix B, may be substituted for the quarterly cylinder gas or relative accuracy audits required per 40 CFR Part 60.

[40 CFR 60.13]; [40 CFR Part 60, Appendix F]; and [40 CFR Part 75]

c) Operational Restrictions

- (1) The permittee shall comply with the applicable with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart GG, including the following sections:



60.333(b)	No owner or operator subject to the provisions of this subpart shall burn in any stationary gas turbine any fuel which contains total sulfur in excess of 0.8 percent by weight (8000 ppmw).
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- (2) The permittee shall burn only natural gas in this emissions unit. The maximum sulfur content of the natural gas shall not exceed 2 grains per 100 standard cubic feet.

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(1), and 3745-77-07(A)(3)(a)(ii)]

- (3) Start-up shall be defined as the operating period prior to reaching Mode 6Q following the initiation operations and shutdown shall be defined as the operating period following the achievement of Mode 5Q following the initiation of the cessation of operations. Under no circumstances shall start-ups exceed 250 minutes in duration nor shall shutdowns exceed 2 hours in duration. The total of all hot, warm, and cold start-ups (as defined below) and shutdowns shall be limited to 286 cycles (each cycle consists of one start-up and one shutdown) per year.

Hot Start - start-up occurs within 8 hours after a plant shutdown
 Warm Start - start-up occurs between 8 to 72 hours after a plant shutdown
 Cold Start - start-up occurs more than 72 hours after a plant shutdown

Each cycle shall be limited to the following:

Pollutant Total lbs/Cycle

NOx 418
 CO 1127
 VOC 97

[*Authority for term:* OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1)]

- (4) The maximum hourly combustion turbine fuel heat input shall not exceed 1744.3 MMBtu/hr.

The maximum hourly fuel heat input of the duct burner for this emissions unit shall not exceed 360 MMBtu/hr. The maximum annual fuel heat input of the duct burner shall not exceed 1,440,000 MMBtu per year, based upon a rolling, 12-month summation of the heat input values.

[*Authority for term:* OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1)]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall comply with the applicable with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart GG, including the following sections:



60.334(j)(1)	Excess emissions and monitor downtime.
60.334(j)(iii)	Excess emissions and monitor downtime.
60.334(h)	Monitoring NO _x and SO ₂ in the fuel.

- (2) The permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPA’s Central Office documenting that the continuous NO_x monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2; and has been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75. The letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

The permittee shall operate and maintain equipment to continuously monitor and record NO_x emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60 and 40 CFR Part 75.

The permittee shall maintain records of data obtained by the continuous NO_x monitoring system including, but not limited to:

- a. emissions of NO_x in parts per million on an instantaneous (one-minute) basis;
- b. emissions of NO_x in all units of the applicable standard(s) in the appropriate averaging period;
- c. results of quarterly cylinder gas audits or linearity checks;
- d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. hours of operation of the emissions unit, continuous NO_x monitoring system, and control equipment;
- g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NO_x monitoring system;
- h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NO_x monitoring system; as well as,



- i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

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

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

[40 CFR 60.13]; [40 CFR Part 60, Appendix B]; and [40 CFR Part 75]

- (3) The permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous CO₂ monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 3; and has been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75. The letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

[40 CFR 60.13]; [40 CFR Part 60, Appendix B]; and [40 CFR Part 75]

- (4) The permittee shall operate and maintain equipment to continuously monitor and record CO₂ emitted from this emissions unit in percent CO₂. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Parts 60 and Part 75.

The permittee shall maintain records of data obtained by the continuous CO₂ monitoring system including, but not limited to:

- a. percent CO₂ on an instantaneous (one-minute) basis;
- b. results of quarterly cylinder gas audits or linearity checks;
- c. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- d. results of required relative accuracy test audit(s);
- e. hours of operation of the emissions unit, continuous CO₂ monitoring system;
- f. the date, time, and hours of operation of the emissions unit without the continuous CO₂ monitoring system;



- g. the date, time, and hours of operation of the emissions unit during any malfunction of the continuous CO₂ monitoring system; as well as,
- h. the reason (if known) and the corrective actions taken (if any) for each such event in (f) and (g).

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

- (4) The permittee shall operate and maintain equipment to continuously monitor and record O₂ emissions from this emissions unit in percent O₂. Such continuous monitoring and recording equipment shall comply with the requirements in the appropriate sections specified in 40 CFR Part 60.13 and 40 CFR Part 75.

The permittee shall maintain records of all data obtained by the continuous O₂ monitoring system including, but not limited to, percent O₂ on an instantaneous (one-minute) basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

[*Authority for term:* OAC rules 3745-77-07(A)(3)(a), 3745-77-07(C)(1), and 40 CFR Parts 60, 72, and 75]

- (5) The permittee shall operate and maintain equipment to continuously monitor and record the fuel flow to this emissions unit when the emissions unit is in operation. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75. If the fuel flow monitoring and/or recording equipment is (are) not in service when the emissions unit is in operation, the permittee shall comply with the appropriate missing data procedures specified in 40 CFR Part 75.

[*Authority for term:* OAC rules 3745-77-07(A)(3)(a), 3745-77-07(C)(1), and 40 CFR Parts 72 and 75]

- (6) The permittee shall monitor the sulfur content and gross calorific value of the fuel being fired in the combustion turbine and duct burner. Fuel sampling and analysis shall be conducted according to the procedures and at the frequency specified by 40 CFR Part 75, Appendix D, section 2.3.3.1.

[*Authority for term:* OAC rules 3745-77-07(A)(3)(a), 3745-77-07(C)(1), and 40 CFR Parts 72 and 75]

- (7) The permittee shall determine the hourly heat input rate to the combustion turbine and duct burner from the fuel flow rate as determined in d)(4) and fuel gross calorific value as determined in Section d)(5). The heat input rate shall be calculated in accordance with the procedures in Section 5 of 40 CFR Part 75, Appendix F.

[*Authority for term:* OAC rules 3745-77-07(A)(3)(a), 3745-77-07(C)(1), and 40 CFR Parts 72 and 75]



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

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(a)(ii), and 3745-77-07(C)(1)]

- (9) The permittee shall maintain monthly records of the following information for this emissions unit:

- a. The natural gas usage rate, in standard cubic feet.
- b. Hours of operation of the combustion turbine.
- c. Hours of operation of the duct burner.
- d. Monthly fuel heat input (MMBtu) to the combustion turbine.
- e. Monthly fuel heat input (MMBtu) to the duct burner.
- f. The rolling, 12-month summations of fuel heat inputs to the combustion turbine and the duct burner.
- g. Number of start-ups, type of start-up (hot, warm or cold) and the duration, in minutes, of each start-up.
- h. Number of shutdowns, and the duration, in hours, of each shutdown.
- i. The total number of start-up/shutdown cycles.
- j. The NO_x, CO, and VOC emissions, in pounds, for all start-up/shutdown cycles.
- k. The total NO_x emissions, in pounds, including start-up/shutdown emissions.
- l. The total CO emissions, in pounds, including start-up/shutdown emissions.
- m. The total VOC emissions, in pounds, including start-up/shutdown emissions.
- n. The total SO₂, PE, NH₃, formaldehyde, and sulfuric acid emissions, in pounds.
- o. The rolling, 12-month summation of the NO_x emissions, in tons, including start-up/shutdown emissions.
- p. The rolling, 12-month summation of the CO emissions, in tons, including start-up/shutdown emissions.
- q. The rolling, 12-month summation of the VOC emissions, in tons, including start-up/shutdown emissions.
- r. The rolling, 12-month summations of the SO₂ and PE emissions, in tons.



[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-31-05(C), 3745-77-07(A)(3)(a), and 3745-77-07(C)(1)]

- (10) The permit to install for these emissions units (P001, P002, P003) were evaluated based on actual materials (typically coatings and clean up materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the air permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy (Air Toxic Policy) was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: Formaldehyde

TLV (ug/m3): 368 (Converted from the STEL)

Maximum Hourly Emission Rate (lbs/hr): 0.81*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 2.60

MAGLC (ug/m3): 8.76

Pollutant: Sulfuric Acid

TLV (ug/m3): 1000

Maximum Hourly Emission Rate (lbs/hr): 1.68*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.74

MAGLC (ug/m3): 23.8

Pollutant: Ammonia

TLV (ug/m3): 17413

Maximum Hourly Emission Rate (lbs/hr): 92*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 94.7

MAGLC (ug/m3): 415

* This was modeled for emissions units P001, P002 and P003 combined.

- (11) Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:
- a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;



Effective Date: To be entered upon final issuance

- b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
- (12) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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

e) Reporting Requirements

- (1) The permittee shall comply with the applicable with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart GG, including the following sections:

60.334(j)	Submit reports of excess emissions and monitor downtime, in accordance with §60.7(c).
60.334(j)(5)	All reports required under §60.7(c) shall be postmarked by the 30th day following the end of each 6-month period.

- (2) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NO_x monitoring system:
 - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of NO_x emissions in



excess of any applicable limit specified in this permit, 40 CFR Part 60, 40 CFR Parts 75 and 76, OAC Chapters 3745-14 and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).

- b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
- i. the facility name and address;
 - ii. the manufacturer and model number of the continuous NO_x and other associated monitors;
 - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
 - iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
 - v. the total NO_x emissions for the calendar quarter (tons);
 - vi. the total operating time (hours) of the emissions unit;
 - vii. the total operating time of the continuous NO_x monitoring system while the emissions unit was in operation;
 - viii. results and dates of quarterly cylinder gas audits or linearity checks;
 - ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
 - x. unless previously submitted, the results of any relative accuracy test audit showing the continuous NO_x monitor out-of-control and the compliant results following any corrective actions;
 - xi. the date, time, and duration of any/each malfunction** of the continuous NO_x monitoring system, emissions unit, and/or control equipment;
 - xii. the date, time, and duration of any downtime** of the continuous NO_x monitoring system and/or control equipment while the emissions unit was in operation; and
 - xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).



Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR 75 are not to be used for showing compliance with the short term OAC 3745-31-05(A)(3) rule-based or NSPS-based limitation(s) in this permit.

* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

** each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit

[40 CFR 60.7] and [40 CFR Part 75]

- (5) The permittee shall collect, record, and maintain measurements, data, records, and reports required per 40 CFR Part 75; and shall submit certification, recertification, notifications, applications, monitoring plans, petitions for alternative monitoring systems, electronic quarterly reports, and any other pertinent record and/or report to the Administrator (U.S. EPA), as required by this Part.

[40 CFR Part 75]

- (6) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous CO₂ monitoring system:
- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR Parts 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of continuous CO₂ monitoring system downtime and malfunction while the emissions unit was on line.
 - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous CO₂ and other associated monitors;
 - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
 - iv. the total operating time (hours) of the emissions unit;
 - v. the total operating time of the continuous CO₂ monitoring system while the emissions unit was in operation;



- vi. results and dates of quarterly cylinder gas audits or linearity checks;
- vii. unless previously submitted, results and dates of the relative accuracy test audit(s) (during appropriate quarter(s));
- viii. unless previously submitted, the results of any relative accuracy test audit showing the continuous CO₂ monitor out-of-control and the compliant results following any corrective actions;
- ix. the date, time, and duration of any/each malfunction* of the continuous CO₂ monitoring system while the emissions unit was in operation;
- x. the date, time, and duration of any downtime* of the continuous CO₂ monitoring system while the emissions unit was in operation; and
- xi. the reason (if known) and the corrective actions taken (if any) for each event in (b)(ix) and (x).

Each report shall address the operations conducted and data obtained during the previous calendar quarter.

* each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit

[40 CFR 60.7] and [40 CFR Part 75]

- (3) Pursuant to OAC rule 3745-15-04, ORC sections 3704.03(l) and 3704.031, and 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Southeast District Office documenting all instances of continuous O₂ 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 malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

[*Authority for term:* OAC rules 3745-15-04, 3745-77-07(A)(3)(c), 3745-77-07(C)(1), and 40 CFR Parts 60, 72, and 75]

- (4) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurred.

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(b), and 3745-77-07(C)(1)]



- (5) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. All exceedances of the hourly allowable combustion turbine fuel heat input level;
 - b. All exceedances of the hourly allowable duct burner fuel heat input level;
 - c. All exceedances of the rolling, 12-month allowable duct burner fuel heat input level;
 - d. Any record which shows that the sulfur content of the natural gas exceeded 2 grains per 100 standard cubic feet;
 - e. Any record which shows that the start-up duration exceeded 250 minutes;
 - f. Any record which shows that the shutdown duration exceeded 2 hours;
 - g. Any record which shows that the total number of start-up/shutdown cycles exceeded 286;
 - h. All exceedances of the NO_x, CO, and/or VOC start-up/shutdown emission limitations during any cycle; and
 - i. All exceedances of the rolling, 12-month NO_x, CO, VOC, SO₂, and/or PE emission limitations.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-31-05(C), 3745-77-07(A)(3)(c), and 3745-77-07(C)(1)]

- (6) The permittee shall also submit annual reports that specify the total NO_x, CO, PE, SO₂, VOC, NH₃, formaldehyde, and sulfuric acid emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(a), and 3745-77-07(C)(1)]

f) Testing Requirements

- (1) The permittee shall comply with the applicable with the applicable monitoring and recordkeeping requirements required under 40 CFR Part 60, Subpart GG, including the following sections:



60.335(a)	The owner or operator shall conduct the performance tests required in §60.8.
60.335(b)(3)	Alternative sampling location.

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
- a. If required, the following emission testing shall be conducted in conjunction with the relative accuracy test audits required for the NOx and CO monitoring systems, as specified in 40 CFR Part 75.
 - b. The emission testing shall be conducted to demonstrate compliance with the mass emission limitations for formaldehyde, VOC, and PE, and the visible particulate emission limitations.
 - c. The following test methods shall be employed to demonstrate compliance with the above emission limitations: for PE, Methods 1 through 5 of 40 CFR Part 60, Appendix A; for visible particulate emission limitations, Method 9 of 40 CFR Part 60, Appendix A; for formaldehyde, Methods 1 through 4 of 40 CFR Part 60, Appendix A and Method 320 of 40 CFR Part 63; for VOC, Methods 1 through 4 and 25 of 40 CFR Part 60, Appendix A; and for CO, Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.
 - d. The testing shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Southeast District Office. The emission testing shall be conducted with and without duct burner firing.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Southeast District Office. 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, Southeast District Office refusal to accept the results of the emission test(s).
 - f. Personnel from the Ohio EPA, Southeast District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Southeast District Office within 30 days following completion of the



test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Southeast District Office.

[*Authority for term:* OAC rule 3745-31-05(A)(3), 3745-77-07(A)(3)(a)(ii), 3745-77-07(C)(1), and 40 CFR Parts 60, 63, and 75]

- (3) Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:

Emission Limitations:

NO_x emissions shall not exceed 3.5 ppmvd at 15% oxygen, 25.0 lbs/hr without duct burner firing, 30.0 lbs/hr with duct burner firing, and 146.9 tons/yr, which includes 27.4 tons/yr for start-ups and shutdowns.

Applicable Compliance Methods:

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]

- a. Emission Limitations:

PE shall not exceed 21.0 lbs/hr without duct burner firing, 25.0 lbs/hr with duct burner firing, and 100.0 tons/yr.

Applicable Compliance Methods:

Ongoing compliance with the lbs/hr emission limitations may be demonstrated through the emissions unit-specific PE factors established during the most recent emission testing that demonstrated that the emissions unit was in compliance and the records required pursuant to d)(6). Compliance with the lbs/hr emission limitations shall be demonstrated through emission testing performed in accordance with f)(1). Compliance with the tons/yr emission limitation shall be demonstrated based upon the records required pursuant to d)(6).

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(a), and 3745-77-07(C)(1)]

- b. Emission Limitations:

SO₂ emissions shall not exceed 12.0 lbs/hr without duct burner firing, 14.0 lbs/hr with duct burner firing, and 56.6 tons/yr.



c. Applicable Compliance Methods:

Ongoing compliance with the lbs/hr emission limitations may be demonstrated based upon the records required pursuant to d)(5) and d)(6). 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 4 and 6. Compliance with the tons/yr emission limitation shall be demonstrated based upon the records required pursuant to d)(6).

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(a), 3745-77-07(C)(1), and 40 CFR Part 75]

d. Emission Limitations:

VOC emissions shall not exceed 3.2 lbs/hr without duct burner firing, 6.8 lbs/hr with duct burner firing, and 31.8 tons/yr, which includes 10.6 tons/yr for start-ups and shutdowns.

Applicable Compliance Methods:

Ongoing compliance with the lbs/hr emission limitations may be demonstrated through the emissions unit-specific VOC emission factors established during the most recent emission testing that demonstrated that the emissions unit was in compliance and the records required pursuant to d)(6). Compliance with the lbs/hr emission limitations shall be demonstrated through emission testing performed in accordance with f)(1). Compliance with the tons/yr emission limitation, including start-up and shutdown emissions, shall be demonstrated based upon the records required pursuant to d)(6).

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(a), and 3745-77-07(C)(1)]

e. Emission Limitations:

CO emissions shall not exceed 9.0 ppmvd without duct burner firing, 15.0 ppmvd with duct burner firing, 33.0 lbs/hr without duct burner firing, 69.0 lbs/hr with duct burner firing, and 366.6 tons/yr, which includes 150.1 tons/yr for start-ups and shutdowns.

Applicable Compliance Methods:

Ongoing compliance with the CO₂ monitoring requirements 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 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]



f. Emission Limitations:

NH₃ emissions shall not exceed 26.0 lbs/hr without duct burner firing, 30.6 lbs/hr with duct burner firing, and 123.1 tons/yr.

Applicable Compliance Methods:

Ongoing compliance with the lbs/hr emission limitations may be demonstrated through the permittee-supplied NH₃ emission factors (0.0149 lb of NH₃/MMBtu without duct burner firing and 0.01454 lb of NH₃/MMBtu with duct burner firing) and the records required pursuant to d)(6). If required, the permittee shall demonstrate compliance with the hourly emission limitations through emission tests performed in accordance with U.S. EPA-approved methods. Compliance with the tons/yr emission limitation shall be demonstrated based upon the records required pursuant to d)(6).

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(a), and 3745-77-07(C)(1)]

g. Emission Limitations:

Formaldehyde emissions shall not exceed 0.23 lb/hr without duct burner firing, 0.26 lb/hr with duct burner firing, and 1.06 tons/yr.

Applicable Compliance Methods:

Ongoing compliance with the lbs/hr emission limitations may be demonstrated through the emissions unit-specific formaldehyde emission factors established during the most recent emission testing that demonstrated that the emissions unit was in compliance and the records required pursuant to d)(6). Compliance with the lb/hr emission limitations shall be demonstrated through emission testing performed in accordance with f)(1). Compliance with the tons/yr emission limitation shall be demonstrated based upon the records required pursuant to d)(6).

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(a), and 3745-77-07(C)(1)]

h. Emission Limitations:

Sulfuric acid emissions shall not exceed 0.48 lb/hr without duct burner firing, 0.56 lb/hr with duct burner firing, and 2.3 tons/yr.

Applicable Compliance Methods:

Ongoing compliance with the lb/hr emission limitations may be demonstrated through the permittee-supplied sulfuric acid emission factors (0.000275 lb of sulfuric acid/MMBtu without duct burner firing and 0.000266 lb of sulfuric acid/MMBtu with duct burner firing) and the records required pursuant to d)(6). If required, the permittee shall demonstrate compliance with the hourly emission



limitations through emission tests performed in accordance with U.S. EPA-approved methods. Compliance with the tons/yr emission limitation shall be demonstrated based upon the records required pursuant to d)(6).

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(a), and 3745-77-07(C)(1)]

i. Emission Limitation:

Visible particulate emissions from any stack shall not exceed 10% opacity as a 6-minute average.

Applicable Compliance Method:

Compliance with this emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 (see f)(1))

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(a), and 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) In accordance with good engineering practices, the SCR unit on this emissions unit shall be operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall maintain on site a copy of the operation and maintenance manual, as provided by the manufacturer.

[*Authority for term:* OAC rules 3745-31-05(A)(3) and 3745-77-07(C)(1)]

- (2) The permittee shall maintain a written quality assurance/quality control plan for the continuous NO_x, CO, and O₂ monitoring system designed to ensure continuous valid and representative readings of NO_x, CO, and O₂ emissions in units of the applicable standard. The plan shall follow the requirements of the appropriate Sections of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B, or as approved by the Ohio EPA, Central Office. The quality assurance/quality control plan and logbook dedicated to the continuous NO_x, CO, and O₂ monitoring system must be kept on site and available for inspection during regular office hours.

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(C)(1), and 40 CFR Parts 60 and 75]



3. P004, Cooling Tower

Operations, Property and/or Equipment Description:

Water circulation system, providing cooled water to critical plant systems

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 3745-31-05(A)(3) (PTI #06-06739 as issued 03/20/2007)	The requirements of this rule also include compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20 and OAC rule 3745-17-07(A).
b.	OAC rules 3745-31-10 through 3745-31-20	Particulate emissions (PE) shall not exceed 1.59 lbs/hr and 7.0 tons/yr.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.
d.	OAC rule 3745-17-11(B)	The emission limitation specified in this rule is less stringent than the emission limitations established pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall maintain an average total dissolved solids (TDS) content of 3,000 ppm or less in the circulating cooling water.

[*Authority for term:* OAC rules 3745-31-05(A)(3) and 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform the following monitoring requirements on a monthly basis:



- a. test and record the TDS content of the circulating cooling water, in ppm; and
- b. determine the average TDS content based on a rolling, 12-month average.

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(a), and 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

- a. any exceedances of the average TDS content limitation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(c), and 3745-77-07(C)(1)]

- (2) The permittee shall also submit annual reports that specify the total PE from this emissions unit for the previous calendar year. The annual reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data for this emissions unit in the annual Fee Emission Report.

[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(c), and 3745-77-07(C)(1)]

f) Testing Requirements

- (1) Compliance with the allowable emission limitations in b)(1) shall be determined according to the following methods:

- a. Emission Limitations:

PE shall not exceed 1.59 lbs/hr and 7.0 tons per year.

Applicable Compliance Methods:

Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the drift loss factor supplied by the permittee (0.0416 lb/thousand gallons water flow based on 0.0005 percent drift) by the circulating water flow rate (in thousands of gallons per hour) and by the average TDS content (ppm) of the cooling water and dividing by 1,000,000 (ppm). Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by 8760 hours and dividing by 2000 lbs/ton.

If required, the permittee shall submit a testing proposal which will demonstrate that the maximum drift loss does not exceed 0.0005 percent.



[*Authority for term:* OAC rules 3745-31-05(A)(3), 3745-77-07(A)(3)(a), and 3745-77-07(C)(1)]

b. Emission Limitation:

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

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

[*Authority for term:* OAC rules 3745-17-07(A), 3745-17-03(B), 3745-31-05(A)(3), 3745-77-07(A)(3)(a), and 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.