OhioEPA

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

1/7/2015

Certified Mail

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

Beth York
ADM GRAIN COMPANY
4666 Faries Pkwy
DECATUR, IL 62526

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0448010313
Permit Number: P0117968
Permit Type: OAC Chapter 3745-31 Modification
County: Lucas

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Erica R. Engel-Ishida, Manager
Permit Issuance and Data Management Section, DAPC

Cc: TDES

Permit Strategy Write-Up

1. Check all that apply:

   Synthetic Minor Determination

   Netting Determination

2. Source Description:

   The Archer Daniels Midland Company (ADM), which is headquartered in Decatur, Illinois, maintains and operates an export type terminal grain elevator on the Maumee River at 1308 Miami Street in Toledo, Ohio. This facility receives grain by ship, truck or rail, processes the grain, stores and ships, primarily by ship or rail.

   The facility proposes to install a bi-fuel conversion kit on an existing diesel engine (P006, shipping leg generator). The conversion kit will allow the existing diesel engine to operate as a dual fuel engine which will use the mix of diesel fuel under compression to ignite the natural gas and reduce diesel fuel consumption. This permit will be processed as a Chapter 31 modification for increases in allowable emissions for the combustion of natural gas. Under PTIO P0107286, P006 was permitted with a limit of 1,550 hours per year to avoid modeling for NOx. The facility has requested the same annual hours of operation restriction with this modification.

3. Facility Emissions and Attainment Status:

   Based on a company analysis submitted May 23, 2009, facility-wide potential to emit at this location is:

pollutant	tons per year
CO	17.99
NOx	28.14
PE	82.11
PM10	25.19
SO2	3.21
VOC	1.29

   A July 10, 1996 letter from the company letter states that this facility is below 20 tons per year actual emissions with the revised AP-42 emission factors. This assumed inherent limitation allows ADM to be treated as a non-title V source under the Ohio EPA's common sense position.

   Lucas County is designated attainment for all criteria pollutants.

4. Source Emissions:

pollutant	40 CFR 60, Subpart IIII[1]		@3.4 mmBtu/hr, dual fuel		@3.4 mmBtu/hr, diesel		P0107286 permit limit	Change in Emissions
	lb/hr	$tpy_{@1,550}$	lb/hr	$tpy_{@1,550}$	lb/hr	$tpy_{@1,550}$	$tpy_{@1,550}$	
CO	31.4	24.3	n/a		n/a		2.51	21.79

pollutant	40 CFR 60, Subpart IIII[1]		@3.4 mmBtu/hr, dual fuel		@3.4 mmBtu/hr, diesel		P0107286 permit limit	Change in Emissions
	lb/hr	$tpy_{@1,550}$	lb/hr	$tpy_{@1,550}$	lb/hr	$tpy_{@1,550}$	$tpy_{@1,550}$	
								tpyincrease
NOx	25.3	19.6	n/a		n/a		11.62	7.98 tpy increase
PE	1.5	1.16	n/a		n/a		0.83	0.33 tpy increase
PM10	n/a		ND[2]	ND[2]	1.06	0.83	0.83	No change
SO2	n/a		0.003	0.002	0.99	0.77	0.77	No change
VOC	n/a		2.7	2.1	1.19	0.93	0.93	1.17 tpy increase

[1] This emissions unit is subject to the Not to Exceed (NTE) standards set forth in 40 CFR 60.4212(d). The NTE requirement for each pollutant level specified in 40 CFR 60.4204(a) is the standard specified for that pollutant x 1.25:

NTE = (1.25)(STD)

The PTE for each pollutant will be based on the NTE as shown in the calculation above.

[2]No data per AP-42, Table 3.4-1 (10/96) "Gaseous Emission Factors for Large Stationary Diesel and All Stationary Dual-Fuel Engines.

5. Conclusion:

   Issuance of this permit as a direct final with state only enforceable terms and conditions will avoid NOx modeling requirements and, by the company's determination, will not affect the major source status of the facility for Title V purposes.

6. Please provide additional notes or comments as necessary:

   ADM proposes to install a bi-fuel conversion kit on an existing diesel engine (P006, shipping leg generator) which will allow the facility to burn natural gas and reduce diesel fuel consumption. The diesel engine is currently restricted to operate a maximum of 1,550 hours per year to avoid state modeling requirements. The facility has requested the same restrictions.

   Calculations
   ADM identifies this engine as a 3.4 mmBtu/hr (1,000 kWh) maximum diesel fired generator, with a normal operating rate of 2.0 mmBtu/hr (600 kWh). PTIO P0107286, issued 4/5/2011, established an operating limit of 1,550 hours per year to avoid state modeling requirements. The facility requests to maintain this operating limitation.

   Allowable emissions
   P006, as currently permitted under P0107286, has 40 CFR 63, Subpart ZZZZ applicability. The installation of a bi-fuel conversion kit is considered a modification under 40 CFR Part 60, Subpart IIII due to a physical change that causes an increase in the emissions rate. When a unit is modified under NSPS, the unit considered "new" for purposes of determining whether the exemption in 63.6590(c) applies. Under 40 CFR 63.6590(c), compliance with the NESHAP, Part 63 Subpart ZZZZ, for new stationary CI RICE located at an area source for HAPs and/or new stationary CI RICE less than or equal to 500 brake HP located at a major source for HAPs is demonstrated through compliance with the NSPS, Part 60 Subpart IIII.

   The emissions limitations under 40 CFR 60, Subpart IIII for CO, NOx and particulates will be used to

determine allowable emissions. This emissions unit is subject to the Not to Exceed (NTE) standards set forth in 40 CFR 60.4212(d). The NTE requirement for each pollutant level specified in 40 CFR 60.4204(a) is the standard specified for that pollutant x 1.25:

NTE = (1.25)(STD)

The PTE for each pollutant will be based on the NTE as shown in the calculation above.

pollutant	g/kW-hr	NTE standard (1.25)(g/kW-hr)	@1,000 kW		Change in Emissions
			lb/hr	$tpy_{@1,550}$	
CO	11.4	14.25	31.4	24.3	21.79 tpy increase
NOx	9.2	11.5	25.3	19.6	7.98 increase
PE	0.54	0.675	1.5	1.16	0.33 increase

Allowable emissions rates for PM10, SO2 and VOC in tons per year are based on the worst-case or largest AP-42 emissions factors for diesel fuel and dual fuel combustion and an operating limitation of 1,550 hours per year. AP-42, Table 3.4-1 (10/96) gives the following dual fuel emissions factors and AP-42, Table 3.3-1 (10/96) gives the following diesel fuel emissions factors:

pollutant	lb/mmBtu (nat. gas)	@3.4 mmBtu/hr, dual fuel		lb/mmBtu (diesel)	@3.4 mmBtu/hr, diesel		Change in Emissions
		lb/hr	$tpy_{@1,550}$		lb/hr	$tpy_{@1,550}$	
PM10	ND	ND	ND	0.31 (worst case)	1.06	0.83	No change
SO2	0.001[1]	0.003	0.002	0.29 (worst case)	0.99	0.77	No change
VOC	0.8 (worst case)	2.7	2.1	0.35	1.19	0.93	1.17 tpy increase

[1]SO_2 emissions limits in AP 42, Fifth edition, of Air Pollution Emission Factors, Chapter 3.4, Table 3.4-1, revised 10/96 are based upon: S_1 = % sulfur in the diesel fuel is 30 ppm (0.003) per the EAC form submitted with the application and S_2 = % sulfur in the natural gas is 0.0005% (0.0005) based on http://www.eia.gov/pub/oil_gas/natural_gas/analysis_publications/natural_gas_1998_issues_trends/pdf/chapter2.pdf

where: SO_2 EF = $0.05S_1 + 0.895S_2$
= (0.05)(0.003) + (0.895)(0.0005)
= 0.001

BAT Analysis

BAT will be expressed as directed in Engineering Guide #87, dated November 12, 2014 (first issue). The BAT format is not changed and was established based on the following:

For all sources modified or constructed after August 3, 2009, BAT will be expressed based on the February 7, 2014 interoffice memorandum which supersedes the *BAT Requirements for Permit*

Applications Filed on or After August 3, 2009 interoffice memorandums dated August 30, 2013 and December 10, 2009, issued after the February 2, 2010 U.S. District Court for the Southern District of Ohio ruling in *Sierra Club v. Christopher Korleski, Director of Ohio EPA*; a court decision which does not recognize the less than 10 tpy BAT exemption.

Under this memorandum, the November 30, 2001 version of the BAT rule (OAC rule 3745-31-05) is the current version of the BAT rule (http://www.epa.ohio.gov/dapc/regs/3745_31/3745_31_Historic.aspx) contained in the approved SIP for sources emitting less than 10 tons per year. This means the Senate Bill 265 (S.B. 265) exemption cannot be used. The memorandum directs permit writers to follow a three-step procedure to determine the BAT limit: 1) Does a MACT/BACT/LAER limit apply? 2) does a RACT limit apply? 3) Case by Case BAT.

Emissions Unit P006 is being modified which increases potential emissions, so it is subject to the 2/7/2014 BAT guidance. Uncontrolled potential emissions of PM10, SO2, and VOC from this emissions unit are less than 10 tons per year.

P006 is a pre-2007 model year CI ICE with <10 L/cyl and >75 hp and ≤3,000 hp engine constructed after July 11, 2005 and located at an area source of HAPs. 40 CFR 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines) applies. The requirements of NSPS Subpart IIII apply only to CO, NOx, and particulate emissions. Therefore, BAT for these pollutants will be based on the applicable NSPS requirements.

There are no MACT, GACT, BACT, LAER, or RACT requirements that apply to PM10, SO2 or VOC emissions, so P006 is subject to a case-by-case BAT for these pollutants.

The 2/7/2014 guidance indicates that the BAT should be expressed in one of the 4 following ways *that is most appropriate for the source*: 1) work practices; 2) source design characteristics or design efficiency; 3) raw material specifications or throughput limitations; or 4) monthly allowable emissions averaged over a rolling, 12-month period. The flow chart contained in Appendix B indicates the order in which these options should be determined: 1st, work practices, if it is a work practice type of source; 2nd, design characteristic or design efficiency, if air pollution controls are installed; 3rd, source design characteristics; and 4th, monthly allowable 12-month rolling limit (production or emissions). TES considers the most appropriate way to express BAT for PM10, SO2, and VOC emissions for P028 is by establishing a monthly emissions limitation averaged over a 12-month rolling period.

This is an uncontrolled emissions source. BAT for P006 for PM10, SO2, and VOC will be expressed tons per month averaged over a 12-month rolling period – equivalent to the allowable annual emissions rate divided by 12.

Pollutant	tons/year	tons/month averaged over a 12-month rolling period
PM10	0.82	0.068
SO2	0.76	0.063
VOC	2.1	0.175

Modeling
Under OEPA's Air Toxics Policy, modeling is required for NOX and SO2 if the allowable emissions increase is 25 tons or more, if CO emissions are 100 tpy or more, or if PM10 emissions increase is 10 tpy or more. The PM10 and SO2 emissions do not increase with the combustion of natural gas. However, the full potential for NOX is greater than 25 tpy. In order to avoid modeling, the facility has requested to maintain the voluntarily restricted the operating hours of 1,550 hours per year.

Applicable Regulations

OAC rule 3745-31-05(A)(3), June 30, 2008

BAT requirements for emissions units having potential emissions of less than 10 tons/yr. This requirement remains in effect until approval of the 12/01/2006 version of OAC rule 3745-31-05(A)(3) by U.S. EPA as part of Ohio's state implementation plan. Per the Ohio EPA's 2/7/2014 BAT guidance memo, BAT for PM10, SO2, and VOC will be expressed as a monthly allowable emission averaged over a 12-month rolling period.

OAC rule 3745-31-05(A)(3)(a)(ii), June 30, 2008

This rule has not yet been approved by U.S. EPA as part of Ohio's state implementation plan. After U.S. EPA approves this rule as part of the SIP, then BAT requirements will no longer be in effect for pollutants with potential emissions of less than 10 tons per year.

Since the uncontrolled potential to emit for PM10, SO2, and VOC emissions is less than 10 tons/yr, the emissions for these pollutants will not be subject to BAT requirements upon approval of the 12/01/2006 version of OAC rule 3745-31-05(A)(3) by U.S. EPA as part of Ohio's state implementation plan.

ORC 3704.03(T)

BAT requirements for emissions units with emissions ≥ 10 tons/yr (CO, NOx)

BAT for this Chapter 31 modification is required to comply with the 2/7/2014 BAT guidance memo from Mike Hopkins of Ohio EPA. Under the current guidance, NSPS IIII emissions limitations apply.

OAC rule 3745-31-05(E)

This permit will establish State enforceable emissions limits without any federally enforceable emissions limits based on 1,550 hours of operation per year to avoid State Modeling for CO and NOx emissions.

OAC rule 3745-17-07(A)(1) - 20% opacity

OAC rule 3745-17-11(B)(5)(a) - 0.310 lb/mmBtu as a stationary small internal combustion engine

OAC rule 3745-18-06(B) - <10 mmBtu/hr sulfur dioxide exemption

OAC rule 3745-110-03(F)

This rule is not applicable; this is a stationary internal combustion engine which burns diesel fuel or, through a bi-fuel conversion kit, natural gas (rich burn). This rule only applies to engines greater than 2,000 hp and are lean burn engines which only burn gaseous fuels, engines which burn only diesel fuel or distillate oil, or engines which burn dual fuels. A bi-fuel conversion kit meets the definition of "dual fuels" because it does allow for natural gas and diesel fuels to be burned simultaneously (assume 95% natural gas, 5% diesel per AP-42, Table 3.4-1, footnote b.). However, the maximum rating of this engine is 1,341 hp. Therefore, this rule does not apply to this engine.

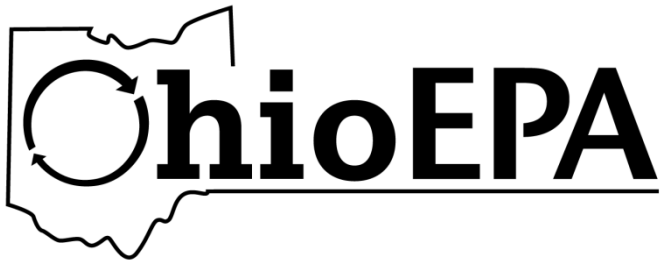
NSPS Subpart IIII

This engine was manufactured pre-2007 and will be modified after the issuance of this permit. The engine displacement is 50.7 L and this is a 16 cylinder engine. Therefore, the displacement is approximately 3 L/cylinder. Unless otherwise noted, the permit terms and conditions will follow the OEPA library language Template #5 - permit terms and conditions for a Pre-2007 model year CI ICE with < 10 L/cylinder and > 175 HP and ≤ 3,000 HP - and will be incorporated in this permit.

The quality of the diesel fuel burned in this emissions unit under the requirements of 40 CFR 63.6604 will be required to meet the 40 CFR 80.510(b) specifications on an "as received" basis: i. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.0015 pound sulfur dioxide/MMBtu actual heat input; and 15 ppm sulfur per gallon of oil or 0.0015% sulfur by weight; ii. acetane index of 40 or an aromatic content of 35 volume percent; and iii. greater than 135,000 Btu/gallon of oil. Compliance with these specifications will be determined by using the analytical results provided by the permittee or oil supplier for each shipment of oil.

7. Total Permit Allowable Emissions Summary (for informational purposes only):

Pollutant	Tons Per Year
CO	24.3 (21.79 increase)
NOx	19.6 (7.98 increase)
PE	1.16 (0.33 increase)
PM10	0.82 (unchanged)
SO2	0.76 (unchanged)
VOC	2.1 (1.17 increase)



FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
ADM GRAIN COMPANY

Facility ID:	0448010313
Permit Number:	P0117968
Permit Type:	OAC Chapter 3745-31 Modification
Issued:	1/7/2015
Effective:	1/7/2015
Expiration:	4/6/2019

Division of Air Pollution Control
Permit-to-Install and Operate
for
ADM GRAIN COMPANY

Table of Contents

Authorization

Facility ID:	0448010313
Application Number(s):	A0052116
Permit Number:	P0117968
Permit Description:	Chapter 31 modification permit due to the addition of a bi-fuel conversion kit to an existing shipping leg generator.
Permit Type:	OAC Chapter 3745-31 Modification
Permit Fee:	$200.00
Issue Date:	1/7/2015
Effective Date:	1/7/2015
Expiration Date:	4/6/2019

Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

ADM GRAIN COMPANY
1308 MIAMI ST
Toledo, OH 43605

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

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

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0117968
Permit Description: Chapter 31 modification permit due to the addition of a bi-fuel conversion kit to an existing shipping leg generator.

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

Emissions Unit ID:	**P006**
Company Equipment ID:	shipping leg generator
Superseded Permit Number:	P0107286
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) None.

2. The following emissions units contained in this permit are subject to 40 CFR Part 60, Subparts A and IIII: P006. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Toledo Division of Environmental Services.

C. Emissions Unit Terms and Conditions

1. P006, shipping leg generator

Operations, Property and/or Equipment Description:

1,000 kW dual-fuel or diesel fuel only fired electric generator

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

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

a. b)(1)d., b)(2)d., c)(2), d)(2), e)(2), f)(1)d., and f)(1)e.

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

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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) June 30, 2008	Emissions of particulate matter 10 microns or less (PM10) from this emissions unit shall not exceed 0.068 ton per month averaged over a 12-month rolling period. Emissions of sulfur dioxide (SO2) from this emissions unit shall not exceed 0.063 ton per month averaged over a 12-month rolling period. Volatile Organic Compound (VOC) emissions from this emissions unit shall not exceed 0.175 ton per month averaged over a 12-month rolling period. See b)(2)a., b)(2)b., and b)(2)d.
b.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	see b)(2)c.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	ORC 3704.03(T)	The CO and NOx requirements established pursuant to this rule are equivalent to the requirements of 40 CFR 60, Subpart IIII.
d.	OAC rule 3745-31-05(E) (volunteered restrictions to avoid state modeling)	See b)(2)d.
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
f.	OAC rule 3745-17-11(B)(5)(A)	Particulate emissions from the stack serving this emissions unit shall not exceed 0.310 pound per mmBtu of actual heat input.
g.	OAC rule 3745-18-06(B)	exemption from sulfur dioxide limitations; less than 10 mmBtu per hour
h.	40 CFR Part 60, Subpart A (63.1 through 63.19)	Table 8 to Subpart IIII of 40 CFR Part 60, provides applicability provisions, definitions, and other general provisions that are applicable to this emissions unit.
i.	40 CFR Part 60, Subpart IIII (40 CFR 60.4200 – 60.4219) [In accordance with 40 CFR 60.4200(a)(2) and (a)(3), emissions unit is a stationary CI ICE that was modified or reconstructed after July 11, 2005 and is subject to the emissions limitations/control measures specified in this section.]	In accordance with 40 CFR 60.4204(a) and Table 1 for pre-2007 model year non-emergency stationary CI ICE with a displacement of less than 10 liters/cylinder and a maximum engine power of kW>560 (hp>750): Emissions of carbon monoxide (CO) shall not exceed 11.4 g/kW-hr (8.5 g/hp-hr). Particulate emissions (PE) shall not exceed 0.54 g/kW-hr (0.40 g/hp-hr). Emissions of nitrogen oxides (NOx) shall not exceed 9.2 g/kw-hr(6.9 g/hp-hr). Emissions of hydrocarbons (HC) shall not exceed 1.3 g/kW-hr (1.0 g/hp-hr). See b)(2)e. through b)(2)l.
j.	40 CFR 63, Subpart ZZZZ	See b)(2)m.

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the carbon monoxide and nitrogen oxide limitations established under OAC rule 3745-31-05(E).

b. This Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).

Once U.S. EPA approves OAC rule 3745-31-05(A)(3)(a)(ii), then these emission limitations/control measures no longer apply.

b)(1)a., f)(1)f., f)(1)h. and f)(1)i.

c. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption as part of the Ohio SIP.

The best available technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the uncontrolled particulate matter less than 10 microns (PM_{10}), sulfur dioxide (SO2) emissions, and volatile organic compound (VOC) emissions from this air contaminant source since the potential to emit for PM_{10}, SO2, and VOC is less than 10 tons per year.

d. Permit to Install P0117968 for this air contaminant source takes into account the following voluntary restrictions as proposed by the permittee for the purpose of avoiding modeling requirements under OAC rule 3745-31-25:

i. The annual emission limitations specified above are based upon the emissions unit's potential to emit at 1550 hours of operation and the Not to Exceed requirements of 40 CFR 60.4012 where NTE = (1.25)*(40 CFR 60.4204(a) standards. Therefore, only records of the annual hours of operation are required to be maintained to demonstrate compliance with these limitations;

ii. COemissions from this emissions unit shall not exceed 24.3 tons per year; and

iii. NOx emissions from this emissions unit shall not exceed 19.6 tons per year.

e. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.

f. In accordance with 40 CFR 60.4204(d), owners or operators of non-emergency stationary CI ICE with a displacement of less than 30 liters per cylinder who

conducted performance tests in-use must meet the not-to-exceed (NTE) standards as indicated in 40 CFR Part 60.4212.

g. In accordance with 40 CFR 60.4206, owners and operators of stationary CI ICE must operate and maintain stationary CI ICE that achieve the emission standards as required in §§60.4204 and 60.4205 over the entire life of the engine.

h. In accordance with 40 CFR 60.4211(a), the CI ICE must be installed and operated according to the manufacturer's emission-related written instructions; the owner/operator shall change only those emission-related settings that are permitted by the manufacturer; and the CI ICE must be installed and operated to meet the applicablerequirements from 40 CFR Part 89, Control of Emissions from New and In-use Non-road CI ICE andPart 1068,the General Compliance Provisions for Engine Programs.

i. In accordance with 40 CFR 60.4211(b), owners or operators of pre-2007 model year CI ICE shall:

   i. Purchase an engine certified according to 40 CFR Part 89 or 40 CFR Part 94, as applicable, for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's specifications.

   ii. Keep records of performance test results for each pollutant for a test conducted on a similar engine. The test must have been conducted using the same methods specified in this subpart and these methods must have been followed correctly.

   iii. Keep records of the engine manufacturer data indicating compliance with the standards.

   iv. Keep records of control device vendor data indicating compliance with the standards.

   v. Conduct an initial performance test to demonstrate compliance with the emission standards according to the requirements specified in 40 CFR Part 60.4212, as applicable.

j. In accordance with 40 CFR 60.4211(e), owners or operators of a modified or reconstructed stationary CI internal combustion engine must comply with the emission standards specified in 40 CFR 60.4204(e) or 40 CFR 60.4205(f) and demonstrate compliance according to one of the methods specified in:

   i. 40 CFR 60.4211(e)(1): purchasing, or otherwise owning or operating, an engine certified to the emission standards in 40 CFR 60.4204(e) or 40 CFR 60.4205(f), as applicable; or

   ii. 40 CFR 60.4211(e)(2): conducting a performance test to demonstrate initial compliance with the emission standards according to the requirements specified in 40 CFR 60.4212 or 40 CFR 60.4213, as

appropriate. The test method must be conducted within 60 days after the engine commences operation after the modification or reconstruction.

k. In accordance with 40 CFR 60.4211(g), if you do not install, configure, operate, and maintain your engine and control device according to the manufacturer's emission-related written instructions, or you change emission-related settings in a way that is not permitted by the manufacturer, you must demonstrate compliance as follows:

i. For owners or operators of a stationary CI internal combustion engine greater than 500 hp, you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions.

ii. In addition, owners or operators must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed configured, operated, and maintained in accordance with the manufacturer's emission-related instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.

iii. Subsequent performance testing must be conducted every 8,760 hours of engine operation or 3 years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards.

l. In accordance with 40 CFR 60.4208(i), the requirements of 40 CFR 60.4208 do not apply to owners or operators of stationary CI ICE that have been modified, reconstructed and do not apply to engines that were removed from one existing location and reinstalled at a new location.

m. In accordance with 40 CFR 63.6590(c), compliance with the NESHAP, Part 63 Subpart ZZZZ, for new stationary CI RICE located at an area source for HAPs and/or new stationary CI RICE less than or equal to 500 brake HP located at a major source for HAPs is demonstrated through compliance with the NSPS, Part 60 Subpart IIII.

c) Operational Restrictions

(1) The permittee shall maintain and operate a positive crankcase ventilation system at all times when the emissions unit is in operation.

(2) The maximum annual hours of operation for this emissions unit shall not exceed 1,550 hours.

(3) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 60, Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, including the following sections:

a.	40 CFR 60.4206 and 40 CFR 60.4211(a)	Operate and maintain CI ICE and any control device according to the manufacturer's written instructions, or procedures developed by the owner/operator that are approved by the manufacturer, over the entire life of the engine.
b.	40 CFR 60.4207(b)	Compliance with 80.510(b) for the quality of diesel fuel burned in CI ICEless than 30 liters/cylinder.
c.	40 CFR 60.4209(b)	If the stationary CI internal combustion engine is equipped with a diesel particulate filter to comply with the emission standards in 40 CFR 60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the permittee when the high backpressure limit of the engine is approached.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain documents provided by the oil supplier for each shipment of #2 fuel oil to demonstrate compliance with the ULSD requirement. These documents must include the receipt or bill of lading that includes confirmation that the fuel meets the #2 diesel fuel ULSD standard.

(2) The permittee shall maintain records of the cumulative hours of operation for each calendar year.

(3) The permittee shall perform weekly checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emissions incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(4) The permittee shall comply with the applicable monitoring and record keeping required under 40 CFR Part 60, Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, including the following sections:

a.	40 CFR 60.4211	Compliance requirements for the owner/operator of non-emergency, stationary, compression ignition internal combustion engines.
b.	40 CFR 60.4211(b)	Maintain the recordsfor the method of compliance, i.e., by maintaining the original certification of emissions for the CI ICE, records of performance test results from a similar ICE, manufacturer's or vendor's emissions test data, or emissions testing results for the ICE.
c.	40 CFR 60.4211(e)	For modified or reconstructed stationary CI internal combustion engines, owners or operators must comply with the emission standards specified in 40 CFR 60.4204(e) or 40 CFR 60.4205(f) and demonstrate compliance according to one of the methods specified in: i.40 CFR 60.4211(e)(1): purchasing, or otherwise owning or operating, an engine certified to the emission standards in 40 CFR 60.4204(e) or 40 CFR 60.4205(f), as applicable; or ii. 40 CFR 60.4211(e)(2): conducting a performance test to demonstrate initial compliance with the emission standards according to the requirements specified in 40 CFR 60.4212 or 40 CFR 60.4213, as appropriate. The test method must be conducted within 60 days after the engine commences operation after

		the modification or reconstruction.
d.	40 CFR 60.4214(a)(2)	Non-emergency stationary CI ICE greater than 175 HP that are not certified must maintain records of: 1. all notifications submitted to comply with Part 60 Subpart IIII andany supporting documentation; 2. the manufacturer's certification of emissions or documentation that the engine meets the emission standards; and 3. records of the maintenance conducted on the engine.
e.	40 CFR 60.4214(c)	If the stationary CI internal combustion engine is equipped with a diesel particulate filter to comply with the emission standards in 40 CFR 60.4204, the permittee shall keep records of the date, time, and any corrective action(s) taken in response to the notification from the backpressure monitor, that the high backpressure limit of the engine has been approached or exceeded.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA District Office or Local Air Agency by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

(2) The permittee shall identify the following information in the annual permit evaluation report:

a. any day when a fuel other than the appropriate fuel oil specified above was burned in this emissions unit.

b. allexceedances of the maximum allowable cumulative operating hours.

(3) The permittee shall identify the following information in the annual permit evaluation report in accordance with the monitoring requirements for visible emissions in term number d(3) above:

a. all days during which any visible particulate emissions were observed from the stack serving this emissions unit; and

b. any corrective actions taken to eliminate the visible particulate emissions.

(4) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to the appropriate district office or local air agency.

(5) A comprehensive written report on the results of the performance tests, conducted to demonstrate compliance with 40 CFR 60.4205(a), shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

(6) Pursuant to the 40 CFR Part 60.7, the permittee is hereby advised of the requirement to report the following at the appropriate times:

a. Construction date (no later than 30 days after such date);

b. Anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

c. Actual start-up date (within 15 days after such date); and

d. Date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency

DAPC - Permit Management Unit

P. O. Box 1049

Columbus, Ohio 43216-1049

and

Toledo Division of Environmental Services

Air Section

348 South Erie Street

Toledo, Ohio 43604

(7) The permittee shall submit semiannual reports and other such notifications and reports as are required pursuant to 40 CFR Part 60, Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, including the following sections:

a.	40 CFR 60.4214(a)(1) and 40 CFR 60.7(a)(1)	Non-emergency stationary CI ICE greater than 175 HP that are not certified mustsubmit an initial notification, as required in 60.7(a)(1), that must include: 1. name and address of owner/operator; 2. address of affected source; 3. the date

		construction (or reconstruction)of the CI ICE commenced; 4. engine information, to include: make, model, engine family, serial number, model year, maximum engine power, and cylinder displacement; 5. identification of emission control equipment, if any; 6. the fuel used, i.e., a statement that the fuel burned, or to be burned, meets the requirements of 40 CFR 80.510(b); and, if not, the written request for the Director's (agency's) approval to use any remaining non-compliant diesel fuel or the date of such letter of approval. The report must be postmarked no later than 30 days after the date construction or reconstruction of the ICE commenced.

(8) All applications, notifications or reports required by d)(7) 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 District Office or Local Air Agency, 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 signatory authority may be represented as provided through procedures established in Air Services.

f) Testing Requirements

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

a. Emission Limitation:

Visible emissions of particulate from the stack shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emission limitation through visible emission observations performed in accordance with

Method 9 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(1).

b. Emission Limitation:

0.310 pound of PE per mmBtu of actual heat input

Applicable Compliance Method:

This emissions limitation was established as the potential to emit for this emissions unit by the uncontrolled emissions factor listed in AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1. Emissions Factors for Uncontrolled Gasoline and Diesel Industrial Engines, dated 10/96, (0.31 lb PE/mmBtu).

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 thru 5 of 40 CFR Part 60, Appendix A using the methods and procedures specified in OAC rule 3745-17-03(B)(9). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitations:

Emissions of carbon monoxide (CO) shall not exceed 11.4 g/kW-hr (8.5 g/hp-hr).

Particulate emissions (PE) shall not exceed 0.54 g/kW-hr (0.40 g/hp-hr).

Emissions of nitrogen oxides (NOx) shall not exceed 9.2 g/kw-hr(6.9 g/hp-hr).

Emissions of hydrocarbons (HC) shall not exceed 1.3 g/kW-hr (1.0 g/hp-hr)

Applicable Compliance Method:

In accordance with 40 CFR 60.4212(a) and (d), where demonstrating compliance through emissions testing, a performance test must be conducted according to the in-use testing procedures in 40 CFR 1039, Subpart F. The exhaust emissions must not exceed the not-to-exceed (NTE) numerical requirements, rounded to the same number of decimal places as the applicable standard from 40 CFR 60.4204(a),where:

NTE = 1.25 x the standard specified foreach pollutant for the same maximum engine power as identified in Table 1 to Part 60 Subpart IIII.

Alternatively, testing may follow the testing procedures specified in 40 CFR 60.4213, using the test methods identified in Table 7 for PM and NOx.

d. Emission Limitation:

CO emissions shall not exceed 24.3 tons per year.

Applicable Compliance Method:

This emissions limitation was established as the potential to emit for this emissions unit by a one-time calculation utilizing the maximum engine power (1,000 kW) for 1,550 hours per year and the uncontrolled emissions factor listed in 40 CFR 60, Subpart IIII, Table 1 (11.4 g CO/kW-hr) multiplied by the not to exceed (NTE) numerical requirement of 40 CFR 60.4212(d) (1.25), and dividing by 2000 pounds per ton and dividing by 454 g/lb.

[(11.4 g/kW-hr)(1.25)(1,000 kW)(1,550 hours/yr)(1 lb/454 g)(1 t/2000 lb)] = 24.3 tons per year.

If required, the permittee shall develop a site-specific emissions factor (g/kW-hr) to demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

e. Emission Limitation:

NOx emissions shall not exceed 19.6 tons per year.

Applicable Compliance Method:

This emissions limitation was established as the potential to emit for this emissions unit by a one-time calculation utilizing the maximum engine power (1,000 kW) for 1,550 hours per year and the uncontrolled emissions factor listed in 40 CFR 60, Subpart IIII, Table 1, (9.2 g NOx/kW-hr) multiplied by the not to exceed (NTE) numerical requirement of 40 CFR 60.4212(d) (1.25) and dividing by 2000 pounds per ton and dividing by 454 g/lb.

[(9.2 g NOx/kW-hr)(1.25)(1,000 kW)(1,550 hours/yr)(1 lb/454 g)(1 t/2000 lb)] = 19.6 tons per year.

If required, the permittee shall develop a site-specific emissions factor (g/kW-hr) to demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and 7 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

f. Emission Limitation:

PM10 emissions shall not exceed 0.068 ton per month averaged over a 12-month rolling period.

Applicable Compliance Method:

This emissions limitation was established as the potential to emit for this emissions unit by a one-time calculation utilizing the maximum hourly fuel input (3.4 mmBtu/hr) for 1,550 hours per year and the uncontrolled emissions factor listed in AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors,

Section 3.3, Table 3.3-1. Emissions Factors for Uncontrolled Gasoline and Diesel Industrial Engines, dated 10/96, (0.31 lb PM10/mmBtu) and dividing by 2000 pounds per ton and divide by 12 months per year to determine the tons of VOC emissions averaged over a rolling, 12-month period.

[(0.31 lb/mmBtu)(1,550 hours/yr)(3.4 mmBtu/hr)(1 t/2000 lb)] ÷ 12 months/year = 0.068 ton per rolling 12-months.

If required, the permittee shall develop a site-specific emissions factor (g/kW-hr) to demonstrate compliance with this emission limitation in accordance with Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

g. Sulfur Content Limitations for Diesel Fuel:

Sulfur content 15 ppm or < 0.0015% by weight sulfur

Applicable Compliance Method:

Compliance shall be demonstrated through the record keeping requirements for the sulfur content of each shipment of diesel oil received. If meeting the standards in 40 CFR 80.510(b), this calculates to approximately 0.0015lb SO_2/MMBtu.

h. Emission Limitation:

SO2 emissions shall not exceed 0.063 ton per month averaged over a 12-month rolling period.

Applicable Compliance Method:

This emissions limitation was established as the potential to emit for this emissions unit by a one-time calculation utilizing the maximum hourly fuel input (3.4 mmBtu/hr) for 1,550 hours per year and the uncontrolled emissions factor listed in AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1. Emissions Factors for Uncontrolled Gasoline and Diesel Industrial Engines, dated 10/96, (0.29 lb SO2/mmBtu) and dividing by 2000 pounds per ton and divide by 12 months per year to determine the tons of VOC emissions averaged over a rolling, 12-month period.

[(0.29 lb/mmBtu)(1,550 hours/yr)(3.4 mmBtu/hr)(1 t/2000 lb)] ÷ 12 months/year = 0.063 ton per rolling 12-months.

If required, the permittee shall develop a site-specific emissions factor (g/kW-hr) to demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and 6 of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

i. Emission Limitation:

VOC emissions shall not exceed 0.175 ton per month averaged over a 12-month rolling period.

Applicable Compliance Method:

This emissions limitation was established as the potential to emit for this emissions unit by a one-time calculation utilizing the maximum hourly fuel input (3.4 mmBtu/hr) for 1,550 hours per year and the uncontrolled emissions factor listed in AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.4, Table 3.4-1. Gaseous Emissions Factors for Large Stationary Diesel and All Stationary Dual-Fuel Engines, dated 10/96, (0.8 lb VOC/mmBtu) and dividing by 2000 pounds per ton and divide by 12 months per year to determine the tons of VOC emissions averaged over a rolling, 12-month period.

[(0.8 lb/mmBtu)(1,550 hours/yr)(3.4 mmBtu/hr)(1 t/2000 lb)] ÷ 12 months/year = 0.175 ton per rolling 12-months.

If required, the permittee shall develop a site-specific emissions factor (g/kW-hr) to demonstrate compliance with this emission limitation in accordance with Methods 1 through 4 and 25A of 40 CFR Part 60, Appendix A. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

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

a. The emission testing shall be conducted within 60 days after the engine commences operation after the modification to combust dual fuel (40 CFR 60.4211(e)(2)).If the permittee switches from dual fuel to an alternate fuel, emission testing shall be conducted within 60 days after the engine commences operation using an alternate fuel. Additional testing may be required consistent with Ohio EPA DAPC Engineering Guide #16 or by request of the Ohio EPA or Toledo Division of Environmental Services.

b. The emission testing shall be conducted on the shipping leg generator (P006) to demonstrate compliance with the allowable emissions limitations in 40 CFR Part 60, Subpart IIII, Table 1.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. For stationary CI ICE with a displacement of less than 10 liters per cylinder, the performance test must be conducted according to the in-use testing procedures in 40 CFR Part 1039, Subpart F as indicated in 40 CFR 60.4212 (40 CFR 60.4204(d)). Alternatively, stationary CI ICE that are complying with the emission standards for pre-2007 model year engines in 40 CFR 60.4204(a), 60.4205(a), or 60.4205(c) may follow the testing specified in 40 CFR 60.4213 as appropriate.

Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

d. The test(s) shall be conducted while the emissions unit served by the stack is operating at or near the maximum capacityor current representative conditions, unless otherwise specified or approved by the Toledo Division of Environmental Services.

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

f. Personnel from the Toledo Division of Environmental Services 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 emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Toledo Division of Environmental Services within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

g) Miscellaneous Requirements

(1) None.