

HAMILTON COUNTY

PUBLIC NOTICE      PUBLIC HEARING  
OHIO ENVIRONMENTAL PROTECTION AGENCY  
ISSUANCE OF DRAFT  
PERMIT TO INSTALL TO  
CINERGY CAPITAL & TRADING, INC.

Public notice is hereby given that the Ohio Environmental Protection Agency (EPA) Division of Air Pollution Control has issued on **June 12, 2001**, a draft of Permit to Install (PTI) No. 14-05029 to Cinergy Capital & Trading, Inc. Cinergy has applied for a PTI for two 48 megawatt simple-cycle combustion turbines to be located at 665 Mehring Way, Cincinnati, Ohio 45202.

A public hearing on the draft air permit is scheduled for Tuesday, July 31, 2001 at Hamilton County Department of Environmental Services, 1<sup>st</sup> Floor Conference Room, 250 William Howard Taft Road, Cincinnati, Ohio 45219-2660. The information session and public hearing will begin at 7:00 p.m. A presiding officer will be present and may limit oral testimony to ensure that all parties are heard.

All interested persons are entitled to attend or be represented and give written or oral comments on the draft permit at the hearing. Written comments must be received by Ohio EPA at the close of the business day on August 3, 2001. Comments received after this date will not be considered to be part of the official record. Written comments may be submitted at the hearing or sent to: Mr. Bradley Miller, Hamilton County Department of Environmental Services, 250 William Howard Taft Road, Cincinnati, Ohio 45219-2660.

Copies of the draft permit application and technical support information may be reviewed and/or copies made by first calling to make an appointment at the Hamilton County Department of Environmental Services, 250 William Howard Taft Road, Cincinnati, Ohio 45219-2660, telephone 513-946-7777.

**Synthetic Minor Determination and/or**  **Netting Determination**  
Permit To Install **14-05029**

A. Source Description

Two 48 MW natural gas combustion turbines are to be installed at Cinergy's West End Station on Mehring Way. These turbines will be equipped with General Electric dry low NOx combustion systems that will limit the hourly nitrogen oxides emissions to 15 ppm at 15% oxygen.

B. Facility Description

This facility is located in Hamilton County, Ohio and will be a synthetic minor for NOx and CO for new source review purposes. Hamilton County is classified as attainment for all pollutants.

C. Source Emissions

Potential emissions of NOx and CO from these two turbines are above the threshold to be considered a major facility for PSD purposes. Therefore Cinergy West End Station will have a fuel usage limit of 3130 million cubic feet of natural gas per year and is required to use dry low NOx combustion system. Compliance with the annual fuel usage limit will be based upon a rolling, 12-month summation. This facility will maintain monthly usage records and submit excursion reports that identify all exceedances of the rolling, 12-month fuel usage limitation.

D. Conclusion

With this permit, the federally enforceable terms and conditions will limit the annual fuel usage and require the use of a dry low NOx combustion system so that the facility has a potential to emit less than 250 tons per year of NOx and CO. Cinergy West End Station will not be considered a major facility for NOx or CO emissions for PSD.



State of Ohio Environmental Protection Agency

**RE: DRAFT PERMIT TO INSTALL  
HAMILTON COUNTY**

**CERTIFIED MAIL**

Street Address:

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

Mailing Address:

Lazarus Gov. Center

**Application No: 14-05029**

**DATE: 6/12/2001**

Cinergy Capital & Trading, Inc.  
John Funke  
PO Box 960  
Cincinnati, OH 45201

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed or final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **\$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

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

CC: USEPA  
Kathy Clayton City of Cincinnati - OEM  
Kentucky

HCDES  
Roy Schweitzer  
OKIRCG

Lloyd Makstell  
Indiana



Permit To Install

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

**Terms and Conditions**

**DRAFT PERMIT TO INSTALL 14-05029**

Application Number: 14-05029  
APS Premise Number: 1431070095  
Permit Fee: **To be entered upon final issuance**  
Name of Facility: Cinergy Capital & Trading, Inc.  
Person to Contact: John Funke  
Address: PO Box 960  
Cincinnati, OH 45201

Location of proposed air contaminant source(s) [emissions unit(s)]:

**655 Mehring Way**  
**Cincinnati, Ohio**

Description of proposed emissions unit(s):

**electric generation station.**

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

**A. State and Federally Enforceable Permit To Install General Terms and Conditions****1. Monitoring and Related Recordkeeping and Reporting Requirements**

- a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - i. The date, place (as defined in the permit), and time of sampling or measurements.
  - ii. The date(s) analyses were performed.
  - iii. The company or entity that performed the analyses.
  - iv. The analytical techniques or methods used.
  - v. The results of such analyses.
  - vi. The operating conditions existing at the time of sampling or measurement.
- 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, 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.
- c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
  - ii. Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.10 below if no deviations occurred during the quarter.

- iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
- iv. 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 are true, accurate, and complete.

## 2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## 3. Risk Management Plans

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

## 4. 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.

## 5. 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.

**Cinergy Capital & Trading, Inc.**

**Facility ID: 1431070095**

**PTI Application: 14-05029**

**Issued: To be entered upon final issuance**

**6. General Requirements**

- a. The permittee must comply with all terms and conditions of this permit. 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.
- c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. 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.

**7. Fees**

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

**8. 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.

## 9. Compliance Requirements

- a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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:
  - i. 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.
  - ii. 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 ORC section 3704.08.
  - iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - iv. 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 appropriate Ohio EPA District Office or local air agency 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:
  - i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - ii. 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.

## 10. Permit To Operate Application

- a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

Cinergy Capital & Trading, Inc.

Facility ID: 1431070095

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Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

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

## **11. Best Available Technology**

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

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**B. State Only Enforceable Permit To Install General Terms and Conditions**

**1. Compliance Requirements**

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

**2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements**

The permittee shall submit required reports in the following manner:

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

**3. Permit Transfers**

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

**4. 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.

**5. Termination of Permit To Install**

**Cinergy Capital & Trading, Inc.**

**PTI Application: 14-05029**

**Issued: To be entered upon final issuance**

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

#### **6. Construction of New Sources(s)**

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

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

#### **7. Public Disclosure**

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

#### **8. Applicability**

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

#### 9. Construction Compliance Certification

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

#### 10. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

#### C. Permit To Install Summary of Allowable Emissions

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

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

<u>Pollutant</u>	<u>Tons Per Year</u>
CO	202.7
NOx	99.72
PM/PM10	39.24
SO2	6.05
VOC	57.3

**Cinergy Capital & Trading, Inc.**

**PTI Application: 14-05029**

**Issued: To be entered upon final issuance**

**Facility ID: 1431070095**

Cinerç

PTI A

Emissions Unit ID: P001

**Issued: To be entered upon final issuance**

**Part II - FACILITY SPECIFIC TERMS AND CONDITIONS**

**A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions**

None

**Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)**

**A. State and Federally Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P001 - 48 Megawatt (Nominal) Simple-Cycle Combustion Turbine #1	OAC rule 3745-31-05(A)(3)

OAC rule 3745-31-05(D)  
Synthetic Minor to avoid PSD

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

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

**Issued: To be entered upon final issuance**

	Applicable Emissions Limitations/Control Measures	hourly)
OAC rule 3745-18-06(A)		See term A.I.2.e
40 CFR Part 60 Subpart GG	<b>EMISSIONS FROM</b>	
40 CFR Part 75	<b>OPERATING AT LOADS <math>\geq</math>60%</b>	The requirements of this rule also include
	<b>OF MAXIMUM:</b>	compliance with the requirements of OAC
OAC rule 3745-103	15.0 ppm NO <sub>x</sub> by volume at 15%	rule 3745-31-05(D), 40 CFR Part 60,
	Oxygen measured on a dry basis,	Subpart GG, 40 CFR Part 75 and OAC
	based on a one-hour average.	rule 3745-103.
	36.0 ppm CO by volume at 15%	NO <sub>x</sub> : 99.72 TPY***
	Oxygen measured on a dry basis,	CO: 202.7 TPY***
	based on a one-hour average.	The above limits are for both turbines and
	NO <sub>x</sub> : 31 lbs/hr, 88.7 TPY*	include emissions from Startup/Shutdown
	CO: 45 lbs/hr, 128.66 TPY*	and from operations $\geq$ 60% load.
	PM/PM10: 12.5 lbs/hr, 35.3 TPY*	See term A.II.3
	PM: 0.022 lb/MMBtu	***Combined emissions for emissions
	SO <sub>2</sub> : 1.91 lbs/hr, 5.45 TPY*	units P001 and P002.
	VOC: 12.5 lbs/hr, 35.3 TPY*	The emission limitation specified by this
	Formaldehyde: 0.40 lb/hr, 1.36 TPY*	rule is less stringent than the emission
	*Based on a rolling, 12 month	limitation established pursuant to OAC
	summation.	rule 3745-31-05(A)(3).
	Combined emissions for emissions	The emission limitation specified by this
	units P001 and P002; (TPY only, not	rule is less stringent than the emission
	hourly)	limitation established pursuant to OAC
	<b>EMISSIONS FROM</b>	rule 3745-31-05(A)(3).
	<b>STARTUP/SHUTDOWN:</b>	Exempt
	NO <sub>x</sub> : 52.5 lbs/cycle, 11.02 TPY**	See term A.III.12
	CO: 352.5 lbs/cycle, 74.0 TPY**	See term A.I.2.d
	PM/PM10: 18.75 lbs/cycle, 3.94	See term A.I.2.d
	TPY**	See term A.I.2.d
	SO <sub>2</sub> : 2.85 lbs/cycle, 0.60 TPY**	See term A.I.2.d
	VOC: 105.0 lbs/cycle, 22.0 TPY**	See term A.I.2.d
	**Combined emissions for emissions	
	units P001 and P002; (TPY only, not	

**Issued: To be entered upon final issuance****2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of dry low NOx burners with a 15.0 ppm NOx emission limit, compliance with the fuel usage limit for operations greater than or equal to 60% of maximum load, and limiting the number of startup/shutdown cycles.
- 2.b** The permittee shall install and maintain dry low NOx burners.
- 2.c** 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.
- 2.d** If the permittee is subject to the requirements of 40 CFR Part 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.
- 2.e** Visible particulate emissions from any stack shall not exceed 10 percent opacity, as a six-minute average when combusting natural gas except during periods of malfunction as provided in OAC rule 3745-17-07(A)(3)(c).
- 2.f** 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.
- 2.g** The hourly emission limitation(s) for PM, PM10, SO2, VOC, and Formaldehyde outlined in term A.I.1. are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

**II. Operational Restrictions**

- 1. The permittee shall burn only natural gas in this emissions unit.
- 2. The maximum sulfur content of the natural gas shall not exceed shall not exceed 0.015% by volume at 15% oxygen on a dry basis.
- 3. The maximum natural gas usage for emissions units P001 and P002, combined when operating at greater than 60% of maximum load shall not exceed 3130 million cubic feet of natural gas per year based upon a rolling, 12-month summation of the natural gas usage rate.

Emissions Unit ID: P001

To ensure enforceability during the first 12 calendar months following issuance of this permit, the permittee shall not exceed the natural gas (fuel) usage restrictions specified in the following table:

Months	Cumulative Summation of Fuel Usage (million cu.ft.) for P001 and P002, Combined
1	818
1-2	1636
1-3	2454
1-4	3130
1-5	3130
1-6	3130
1 - 7	3130
1 - 8	3130
1 - 9	3130
1 - 10	3130
1 - 11	3130
1 - 12	3130

- As specified in the permittee's PTI application, the maximum design electric output of emissions unit P001 is 48 MW\*, measured at the generator terminal, when firing natural gas. This value corresponds to a maximum natural gas flow of 0.547 million cf/hr with a lower heat value of 1025 Btu/cf (164 mmBtu/hr), at 0 degrees F. The permittee shall operate this emissions unit within the design electric output of the system as specified above, except for startup and shutdown. Startup/shutdown shall be defined as any time that the unit is operating at less than 60% of its maximum load, which corresponds to a set load at specified temperatures as in the following table. The startup/shutdown cycle shall not exceed 1.5 hours in duration.

Ambient Temp. (°F)	0	10	20	30	40	50	60	70	80	90	100
60% Load, (MW)	29	28	27	26	26	25	25	24	23	22	21

\*The short term emission limits in this permit are based on this unit's heat input rate at 60% of the maximum load and represent the worst-case emissions for operations not including startup/shutdown. The Ohio EPA is aware that extreme temperature conditions impact the capacity of the unit and the agency may adjust the potential to emit of the emissions units accordingly.

- The combined number of startup/shutdown cycles per year for units P001 and P002 combined shall not exceed 420. Each startup and shutdown cycle shall not exceed 1.5 hours.
- With the exception of startup and shutdown, emissions unit P001 shall be operated at a minimum of 60% load. The permittee may petition the Hamilton County Department of Environmental Services to operate at a greater load range if it can demonstrate to the agency's satisfaction that the emissions unit will comply with all applicable emission limits in this permit.

**III. Monitoring and/or Recordkeeping Requirements**

**Issued: To be entered upon final issuance**

1. The permittee shall maintain monthly records of the following information for emissions unit P001:
  - a. the quantity of natural gas fired when the unit is operating greater than or equal to 60% of maximum load (see above table with varying temperatures and corresponding megawattages), in million cubic feet;
  - b. the monthly emission rate\* for PM, NO<sub>x</sub>, SO<sub>2</sub>, CO, and VOC;
  - c. during the first 12 calendar months of operation following issuance of this permit, the cumulative quantity of natural gas fired when the unit is operating greater than or equal to 60% of maximum load (see above table with varying temperatures and corresponding megawattages), in million cubic feet for emissions unit P001 and P002 combined;
  - d. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12 month summation of the quantity of natural gas fired when the unit is operating greater than or equal to 60% of maximum load (see above table with varying temperatures and corresponding loads), in million cubic feet for emissions unit P001 and P002 combined;
  - e. the number of startup/shutdown cycles that occurred during the month for emissions unit P001 and P002 combined;
  - f. the date and amount of time, in minutes, of each startup/shutdown cycle (the amount of time the turbine operates at a load less than 60%).

\*The permittee shall use the most recent testing/emissions data available for NO<sub>x</sub> and CO, in conjunction with the quantity of fuel fired, as recorded above, to determine monthly emissions. The monthly emissions calculated above may include an adjustment for the average ambient temperature for that month the unit is operating.

2. The permittee shall maintain documentation on the sulfur and nitrogen contents of the fuels as required in 40 CFR 60.334(b). The permittee may submit a custom fuel monitoring schedule to deviate from the sampling schedule in 40 CFR 60.334(b).
3. Certification

Prior to the installation of the continuous NO<sub>x</sub> monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 6 for approval by the

Ohio EPA, Central Office.

Within 60 days of the startup of this emissions unit, the permittee shall conduct certification tests of such equipment pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6, and/or 40 CFR Part 75. Personnel from the Hamilton County Department of Environmental Services shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the Hamilton County Department of Environmental Services and the Ohio EPA, Central Office within 30 days after the test is completed. Certification of the continuous NO<sub>x</sub> monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6 and/or 40 CFR Part 75.

4. The permittee shall operate and maintain existing equipment to continuously monitor and record NO<sub>x</sub> from this emissions unit in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13 and/or 40 CFR Part 75.

The permittee shall maintain records of all data obtained by the continuous NO<sub>x</sub> monitoring system including, but not limited to, parts per million NO<sub>x</sub> on an instantaneous (one-minute) basis, emissions of NO<sub>x</sub> in units of the applicable standard in the appropriate averaging period (hourly), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

5. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous NO<sub>x</sub> monitoring system designed to ensure continuous valid and representative readings of NO<sub>x</sub> emissions in units of the applicable standard. The plan shall follow the requirements of 40 CFR Part 60, Appendix F and/or 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous NO<sub>x</sub> monitoring system must be kept on site and available for inspection during regular office hours.
6. Certification

Prior to the installation of the continuous CO monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specifications 4 and 6 for approval by the Ohio EPA, Central Office.

Within 60 days of the startup of this emissions unit, the permittee shall conduct certification tests of the continuous CO monitoring system pursuant to ORC section 3704.03(I), 40 CFR Part 60, Appendix B, Performance Specification 4 and 6. Personnel from the Hamilton County Department of Environmental Services shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the Hamilton County Department of Environmental Services and the Ohio EPA, Central Office within

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30 days after the test is completed. Certification of the continuous CO monitoring system shall be granted upon determination by the Ohio EPA Central Office that the system meets all requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specifications 4 and 6.

7. The permittee shall operate and maintain equipment to continuously monitor and record CO from this emissions unit in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13 .

The permittee shall maintain records of all data obtained by the continuous CO monitoring system including, but not limited to, parts per million CO on an instantaneous (one minute) basis, emissions of CO in units of the applicable standard in the appropriate averaging period (hourly), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

8. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous CO monitoring system designed to ensure continuous valid and representative readings of CO. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous CO monitoring system must be kept on site and available for inspection during regular office hours.

9. Certification

Prior to the installation of the continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 3 for approval by the Ohio EPA, Central Office.

Within 60 days of the startup of this emissions unit, the permittee shall conduct certification tests of such equipment pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 3, and/or 40 CFR Part 75. Personnel from the Hamilton County Department of Environmental Services shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the Hamilton County Department of Environmental Services and the Ohio EPA, Central Office within 30 days after the test is completed. Certification of the continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 3 and/or 40 CFR Part 75.

10. The permittee shall operate and maintain equipment to continuously monitor and record CO<sub>2</sub> or

Emissions Unit ID: P001

O<sub>2</sub> from this emissions unit in percent CO<sub>2</sub> or O<sub>2</sub>. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13 and/or 40 CFR Part 75.

The permittee shall maintain records of all data obtained by the continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system including, but not limited to, percent CO<sub>2</sub> or O<sub>2</sub> on an instantaneous (one-minute) basis, emissions of CO<sub>2</sub> or O<sub>2</sub> in units of the applicable standard in the appropriate averaging period (e.g., hourly, hourly rolling, 3-hour, daily, 30-day rolling, etc.), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

11. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system designed to ensure continuous valid and representative readings of CO<sub>2</sub> or O<sub>2</sub> emissions in units of the applicable standard. The plan shall follow the requirements of 40 CFR Part 60, Appendix F and/or 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system must be kept on site and available for inspection during regular office hours.
12. The permittee shall monitor the sulfur content and nitrogen content of the fuel being fired in the turbine. The frequency of the monitoring shall be determined as follows:
  - a. If the turbine is supplied its fuel from a bulk storage tank, the values shall be determined on each occasion that fuel is transferred to the storage tank from any other source.
  - b. If the turbine is supplied its fuel without intermediate bulk storage the values shall be determined and recorded daily. Owners, operators, or fuel vendors may develop custom fuel schedules for the determination of the values based on the design and operation of the affected facility and the characteristics of the fuel supply. These custom schedules shall be substantiated with data and must be approved by the Ohio EPA, Central Office before they can be used.
  - c. Fuel sampling and analysis of sulfur shall be conducted according to the procedures and at the frequency specified by 40 CFR Part 75, Appendix D.

#### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month natural gas usage limitations and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative natural gas usage limitations.
3. The permittee shall submit deviation (excursion) reports that identify any record which shows that the sulfur content of the natural gas exceeded 0.015% by volume at 15% oxygen on a dry basis.

Emissions Unit ID: P001

4. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) 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 Hamilton County Department of Environmental Services documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of NO<sub>x</sub> values in excess of the applicable limits specified in 40 CFR Part 76 or any limitations specified in the terms and conditions of this permit or variance. These reports shall also contain the total NO<sub>x</sub> emissions for the calendar quarter (in tons).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Hamilton County Department of Environmental Services documenting any continuous NO<sub>x</sub> monitoring system downtime while the emissions unit was on line (date, time, duration, and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the 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, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission 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.

5. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) 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 Hamilton County Department of Environmental Services documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any) of all instances of CO values in excess of any applicable limitation(s) specified in OAC Chapter 3745-21, 40 CFR Part 60, or any limitation(s) specified in the terms and conditions of this permit, in units of the standard. These reports shall also contain the total CO emissions for the calendar quarter (in tons).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Hamilton County Department of Environmental Services documenting any continuous CO monitoring system downtime while the emissions unit was on line (date, time, duration, and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement

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to that effect along with 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, control equipment, and/or monitoring system 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 also be included in the quarterly report. These quarterly excess emission 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.

6. The permittee shall submit deviation (excursion) reports that identify any exceedance of the 1.5 hours per startup/shutdown cycle limitation in term A.II.5.
7. Pursuant to 40 CFR Part 60.7, the permittee is hereby advised of the requirement to report the following at the appropriate times:
  - a. construction start date (no later than 30 days after such date),
  - b. anticipated startup date (at least 30 days but not more than 60 days prior to such date),
  - c. actual startup date (within 15 days after such date),
  - 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 163669  
 Columbus, OH 43216-3669

and

Hamilton County DOES - P&E  
 250 Wm. H. Taft Road  
 Cincinnati, OH 45219

8. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which indicate the number of startup/shutdown cycles that occurred during the previous calendar year. These reports are due January 30 of each year.
9. The permittee shall also submit annual reports which specify the total PM/PM10, VOC, and SO2 emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 30 of each year.
10. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

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**V. Testing Requirements**

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emissions testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit.
  - b. The emission testing shall be conducted to demonstrate compliance with NO<sub>x</sub>, CO, VOC and formaldehyde emission limits.
  - c. The following test methods shall be employed to demonstrate compliance with the above emissions limitations:
    - i. NO<sub>x</sub>: Method 7 of 40 CFR Part 60 Appendix A
    - ii. CO: Method 10 of 40 CFR Part 60 Appendix A
    - iii. VOC: Method 25 of 40 CFR Part 60 Appendix A
    - iv. Formaldehyde: SW-846 Method 0011.

Alternative U.S. EPA test methods may be used with prior approval from the Hamilton County Department of Environmental Services.
  - d. The testing shall be performed at peak load (as defined by 40 CFR Part 60 Subpart GG), unless otherwise specified or approved by the Hamilton County Department 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 Hamilton County Department of Environmental Services. 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 tests. Failure to submit such notification for review and approval prior to the tests may result in the Hamilton County Department's of Environmental Services refusal to accept the results of the emission tests.
  - f. Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing



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\*Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Hamilton County Department of Environmental Services. The newest or most recent revisions to the applicable test method shall be used for these analyses. Alternative, equivalent methods may be used if they comply with the requirements specified in 40 CFR Part 60.13 and/or 40 CFR Part 75, or upon written approval by the Hamilton County Department of Environmental Services. The frequency of the sampling shall be such that it complies with the requirements specified in 40 CFR Part 60.334 and/or 40 CFR Part 75 or as approved by the Ohio EPA.

5. Compliance with the fuel usage limitation described in term A.II.3 shall be demonstrated by the record keeping requirements in term A.III.1.
6. Compliance with the sulfur content of the natural gas in term A.II.2 shall be demonstrated by the record keeping requirements in term A.III.12.
7. Compliance with the limit on the number of startup/shutdown cycles permitted per year shall be demonstrated by the record keeping requirements in term A.III.1.e.
8. Compliance with the the limit on the amount of time for each startup/shutdown cycles per year shall be demonstrated by the record keeping requirements in term A.III.1.f.

**VI. Miscellaneous Requirements**

1. Should this emissions unit be converted from a simple cycle to a combined cycle turbine in the future, a new BAT determination would be required.

**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Combustion Turbine #1</u>	<u>Applicable Rules/Requirements</u>
P001- 48 Megawatt (Nominal) Simple-Cycle		None

Applicable Emissions  
Limitations/Control  
Measures

None

**2. Additional Terms and Conditions**

**2.a** None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than 1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.

Ciner  
PTI A

Emissions Unit ID: P002

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Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>
P002 - 48 Megawatt (Nominal) Simple-Cycle Combustion Turbine #2	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(D) Synthetic Minor to avoid PSD

Ciner;  
PTI A

Emissions Unit ID: P002

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	Applicable Emissions Limitations/Control Measures	See term A.I.2.e
OAC rule 3745-17-07(A)(1)	<b>EMISSIONS FROM OPERATING AT LOADS <math>\geq</math>60% OF MAXIMUM:</b>	The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D), 40 CFR Part 60, Subpart GG, 40 CFR Part 75 and OAC rule 3745-103.
OAC rule 3745-17-11(B)(4)	15.0 ppm NOx by volume at 15% Oxygen measured on a dry basis, based on a one-hour average.	NOx: 99.72 TPY*** CO: 202.7 TPY***
OAC rule 3745-18-06(A) 40 CFR Part 60 Subpart GG	36.0 ppm CO by volume at 15% Oxygen measured on a dry basis, based on a one-hour average.	The above limits are for both turbines and include emissions from Startup/Shutdown and from operations $\geq$ 60% load.
40 CFR Part 75	NOx: 31 lbs/hr, 88.7 TPY* CO: 45 lbs/hr, 128.66 TPY*	See term A.II.3
OAC rule 3745-103	PM/PM10: 12.5 lbs/hr, 35.3 TPY* PM: 0.022 lb/MMBtu SO2: 1.91 lbs/hr, 5.45 TPY* VOC: 12.5 lbs/hr, 35.3 TPY* Formaldehyde: 0.40 lb/hr, 1.14 TPY*	***Combined emissions for emissions units P001 and P002.
	*Based on a rolling, 12-month summation. Combined emissions for P001 and P002; (TPY only, not hourly)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	<b>EMISSIONS FROM STARTUP/SHUTDOWN:</b>	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
	NOx: 52.5 lbs/cycle, 11.02 TPY** CO: 352.5 lbs/cycle, 74.0 TPY**	Exempt
	PM/PM10: 18.75 lbs/cycle, 3.94 TPY**	See term A.III.12
	SO2: 2.85 lbs/cycle, 0.60 TPY**	See term A.I.2.d
	VOC: 105.0 lbs/cycle, 22.0 TPY**	See term A.I.2.d
	**Combined emissions for P001 and P002; (TPY only, not hourly)	

**2. Additional Terms and Conditions**

- 2.a** Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of dry low NOx burners with a 15.0 ppm NOx emission limit, compliance with the fuel usage limit for operations greater than or equal to 60% of maximum load, and limiting the number of startup/shutdown cycles.
- 2.b** The permittee shall install and maintain dry low NOx burners.
- 2.c** 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.
- 2.d** If the permittee is subject to the requirements of 40 CFR Part 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.
- 2.e** Visible particulate emissions from any stack shall not exceed 10 percent opacity, as a six-minute average except during periods of malfunction as provided in OAC rule 3745-17-07(A)(3)(c).
- 2.f** 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.
- 2.g** The hourly emission limitation(s) for PM, PM10, SO2, VOC, and Formaldehyde outlined in term A.I.1. are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limits.

**II. Operational Restrictions**

1. The permittee shall burn only natural gas in this emissions unit.
2. The maximum sulfur content of the natural gas shall not exceed 0.015% by volume at 15% oxygen on a dry basis.
3. The maximum natural gas usage for emissions units P001 and P002, combined when operating at greater than 60% of maximum load shall not exceed 3130 million cubic feet of natural gas per year based upon a rolling, 12-month summation of the natural gas usage rate.

To ensure enforceability during the first 12 calendar months following issuance of this permit, the permittee shall not exceed the natural gas (fuel) usage restrictions specified in the following table:

Months	Cumulative Summation of Fuel Usage (million cu.ft.) for P001 and P002, Combined
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1	818
1-2	1636
1-3	2454
1-4	3130
1-5	3130
1-6	3130
1 - 7	3130
1 - 8	3130
1 - 9	3130
1 - 10	3130
1 - 11	3130
1 - 12	3130

4. As specified in the permittee's PTI application, the maximum design electric output of emissions unit P001 is 48 MW\*, measured at the generator terminal, when firing natural gas. This value corresponds to a maximum natural gas flow of 0.547 million cf/hr with a lower heat value of 1025 Btu/cf (164 mmBtu/hr), at 0 degrees F. The permittee shall operate this emissions unit within the design electric output of the system as specified above, except for startup and shutdown. Startup/shutdown shall be defined as any time that the unit is operating at less than 60% of its maximum load, which corresponds to a set load at specified temperatures as in the following table. The startup/shutdown cycle shall not exceed 1.5 hours in duration.

Ambient Temp. (°F)	0	10	20	30	40	50	60	70	80	90	100
60% Load, (MW)	29	28	27	26	26	25	25	24	23	22	21

\*The short term emission limits in this permit are based on this unit's heat input rate at 60% of the maximum load and represent the worst-case emissions for operations not including startup/shutdown. The Ohio EPA is aware that extreme temperature conditions impact the capacity of the unit and the agency may adjust the potential to emit of the emissions units accordingly.

5. The combined number of startup/shutdown cycles per year for units P001 and P002 combined shall not exceed 420. Each startup and shutdown cycle shall not exceed 1.5 hours.
6. With the exception of startup and shutdown, emissions unit P001 shall be operated at a minimum of 60% load. The permittee may petition the Hamilton County Department of Environmental Services to operate at a greater load range if it can demonstrate to the agency's satisfaction that the emissions unit will comply with all applicable emission limits in this permit.

**III. Monitoring and/or Recordkeeping Requirements**

Emissions Unit ID: P002

1. The permittee shall maintain monthly records of the following information for emissions unit P001:
  - a. the quantity of natural gas fired when the unit is operating greater than or equal to 60% of maximum load (see above table with varying temperatures and corresponding megawattages), in million cubic feet;
  - b. the monthly emission rate\* for PM, NO<sub>x</sub>, SO<sub>2</sub>, CO, and VOC;
  - c. during the first 12 calendar months of operation following issuance of this permit, the cumulative quantity of natural gas fired when the unit is operating greater than or equal to 60% of maximum load (see above table with varying temperatures and corresponding megawattages), in million cubic feet for emissions unit P001 and P002 combined;
  - d. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12 month summation of the quantity of natural gas fired when the unit is operating greater than or equal to 60% of maximum load (see above table with varying temperatures and corresponding loads), in million cubic feet for emissions unit P001 and P002 combined;
  - e. the number of startup/shutdown cycles that occurred during the month for emissions unit P001 and P002 combined;
  - f. the date and amount of time, in minutes, of each startup/shutdown cycle (the amount of time the turbine operates at a load less than 60%).

\*The permittee shall use the most recent testing/emissions data available for NO<sub>x</sub> and CO, in conjunction with the quantity of fuel fired, as recorded above, to determine monthly emissions. The monthly emissions calculated above may include an adjustment for the average ambient temperature for that month the unit is operation.

2. The permittee shall maintain documentation on the sulfur and nitrogen contents of the fuels as required in 40 CFR 60.334(b). The permittee may submit a custom fuel monitoring schedule to deviate from the sampling schedule in 40 CFR 60.334(b).

3. Certification

Prior to the installation of the continuous NO<sub>x</sub> monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 6 for approval by the Ohio EPA, Central Office.

Within 60 days of the startup of this emissions unit, the permittee shall conduct certification tests of such equipment pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6, and/or 40 CFR Part 75. Personnel from the Hamilton County Department of Environmental Services shall be notified 30 days prior to initiation of the applicable

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tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the Hamilton County Department of Environmental Services and the Ohio EPA, Central Office within 30 days after the test is completed. Certification of the continuous NO<sub>x</sub> monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6 and/or 40 CFR Part 75.

4. The permittee shall operate and maintain existing equipment to continuously monitor and record NO<sub>x</sub> from this emissions unit in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13 and/or 40 CFR Part 75.

The permittee shall maintain records of all data obtained by the continuous NO<sub>x</sub> monitoring system including, but not limited to, parts per million NO<sub>x</sub> on an instantaneous (one-minute) basis, emissions of NO<sub>x</sub> in units of the applicable standard in the appropriate averaging period (hourly), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

5. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous NO<sub>x</sub> monitoring system designed to ensure continuous valid and representative readings of NO<sub>x</sub> emissions in units of the applicable standard. The plan shall follow the requirements of 40 CFR Part 60, Appendix F and/or 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous NO<sub>x</sub> monitoring system must be kept on site and available for inspection during regular office hours.

6. Certification

Prior to the installation of the continuous CO monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specifications 4 and 6 for approval by the Ohio EPA, Central Office.

Within 60 days of the startup of this emissions unit, the permittee shall conduct certification tests of the continuous CO monitoring system pursuant to ORC section 3704.03(I), 40 CFR Part 60, Appendix B, Performance Specification 4 and 6. Personnel from the Hamilton County Department of Environmental Services shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the Hamilton County Department of Environmental Services and Ohio EPA, Central Office within 30 days after the test is completed. Certification of the continuous CO monitoring system shall be granted upon

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determination by the Ohio EPA Central Office that the system meets all requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specifications 4 and 6.

7. The permittee shall operate and maintain equipment to continuously monitor and record CO from this emissions unit in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13 .

The permittee shall maintain records of all data obtained by the continuous CO monitoring system including, but not limited to, parts per million CO on an instantaneous (one minute) basis, emissions of CO in units of the applicable standard in the appropriate averaging period (hourly), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

8. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous CO monitoring system designed to ensure continuous valid and representative readings of CO. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous CO monitoring system must be kept on site and available for inspection during regular office hours.

9. Certification

Prior to the installation of the continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 3 for approval by the Ohio EPA, Central Office.

Within 60 days of the startup of this emissions unit, the permittee shall conduct certification tests of such equipment pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 3, and/or 40 CFR Part 75. Personnel from the Hamilton County Department of Environmental Services shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the Hamilton County Department of Environmental Services and the Ohio EPA, Central Office within 30 days after the test is completed. Certification of the continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 3 and/or 40 CFR Part 75.

10. The permittee shall operate and maintain equipment to continuously monitor and record CO<sub>2</sub> or O<sub>2</sub> from this emissions unit in percent CO<sub>2</sub> or O<sub>2</sub>. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13 and/or 40 CFR Part 75.

The permittee shall maintain records of all data obtained by the continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system including, but not limited to, percent CO<sub>2</sub> or O<sub>2</sub> on an instantaneous (one-minute) basis, emissions of CO<sub>2</sub> or O<sub>2</sub> in units of the applicable standard in the appropriate averaging period (e.g.,

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hourly, hourly rolling, 3-hour, daily, 30-day rolling, etc.), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

11. Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system designed to ensure continuous valid and representative readings of CO<sub>2</sub> or O<sub>2</sub> emissions in units of the applicable standard. The plan shall follow the requirements of 40 CFR Part 60, Appendix F and/or 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous CO<sub>2</sub> or O<sub>2</sub> monitoring system must be kept on site and available for inspection during regular office hours.
12. The permittee shall monitor the sulfur content and nitrogen content of the fuel being fired in the turbine. The frequency of the monitoring shall be determined as follows:
  - a. If the turbine is supplied its fuel from a bulk storage tank, the values shall be determined on each occasion that fuel is transferred to the storage tank from any other source.
  - b. If the turbine is supplied its fuel without intermediate bulk storage the values shall be determined and recorded daily. Owners, operators, or fuel vendors may develop custom fuel schedules for the determination of the values based on the design and operation of the affected facility and the characteristics of the fuel supply. These custom schedules shall be substantiated with data and must be approved by the Ohio EPA, Central Office before they can be used.
  - c. Fuel sampling and analysis of sulfur shall be conducted according to the procedures and at the frequency specified by 40 CFR Part 75, Appendix D.

#### IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month natural gas usage limitations and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative natural gas usage limitations.
3. The permittee shall submit deviation (excursion) reports that identify any record which shows that the sulfur content of the natural gas exceeded 0.015% by volume at 15% oxygen on a dry basis.
4. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) 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 Hamilton County Department of Environmental Services documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of NO<sub>x</sub> values in excess of the applicable limits specified in 40 CFR Part 76 or any limitations specified in the terms and conditions of this permit or variance. These reports shall also contain the total NO<sub>x</sub> emissions for

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the calendar quarter (in tons).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Hamilton County Department of Environmental Services documenting any continuous NOx monitoring system downtime while the emissions unit was on line (date, time, duration, and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the 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, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission 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.

5. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) 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 Hamilton County Department of Environmental Services documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any) of all instances of CO values in excess of any applicable limitation(s) specified in OAC Chapter 3745-21, 40 CFR Part 60, or any limitation(s) specified in the terms and conditions of this permit, in units of the standard. These reports shall also contain the total CO emissions for the calendar quarter (in tons).

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Hamilton County Department of Environmental Services documenting any continuous CO monitoring system downtime while the emissions unit was on line (date, time, duration, and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the 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, control

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equipment, and/or monitoring system 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 also be included in the quarterly report. These quarterly excess emission 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.

6. The permittee shall submit deviation (excursion) reports that identify any exceedance of the 1.5 hours per startup/shutdown cycle limitation in term A.II.5.
7. Pursuant to 40 CFR Part 60.7, the permittee is hereby advised of the requirement to report the following at the appropriate times:
  - a. construction start date (no later than 30 days after such date),
  - b. anticipated startup date (at least 30 days but not more than 60 days prior to such date),
  - c. actual startup date (within 15 days after such date),
  - 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 163669  
 Columbus, OH 43216-3669

and

Hamilton County DOES - P&E  
 250 Wm. H. Taft Road  
 Cincinnati, OH 45219

8. The permittee shall submit annual reports to the Hamilton County Department of Environmental Services which indicate the number of startup/shutdown cycles that occurred during the previous calendar year. These reports are due January 30 of each year.
9. The permittee shall also submit annual reports which specify the total PM/PM10, VOC, and SO<sub>2</sub> emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 30 of each year.
10. The deviation reports shall be submitted in accordance with the reporting requirements of the General Terms and Conditions of this permit.

## V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
  - a. The emissions testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit.
  - b. The emission testing shall be conducted to demonstrate compliance with NO<sub>x</sub>, CO, VOC and formaldehyde emission limits.
  - c. The following test methods shall be employed to demonstrate compliance with the above emissions limitations:
    - i. NO<sub>x</sub>: Method 7 of 40 CFR Part 60 Appendix A
    - ii. CO: Method 10 of 40 CFR Part 60 Appendix A
    - iii. VOC: Method 25 of 40 CFR Part 60 Appendix A
    - iv. Formaldehyde: SW-846 Method 0011.

Alternative U.S. EPA test methods may be used with prior approval from the Hamilton County Department of Environmental Services.
  - d. The testing shall be performed at peak load (as defined by 40 CFR Part 60 Subpart GG), unless otherwise specified or approved by the Hamilton County Department 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 Hamilton County Department of Environmental Services. 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 tests. Failure to submit such notification for review and approval prior to the tests may result in the Hamilton County Department's of Environmental Services refusal to accept the results of the emission tests.
  - f. Personnel from the Hamilton County Department of Environmental Services shall be permitted to witness the tests, 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 tests shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services within 30 days following completion of the tests.

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The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Hamilton County Department of Environmental Services.

2. Compliance with the allowable emission limitation in this permit shall be determined according to the following methods:
  - a. NOx: Compliance with the allowable outlet concentration and the lbs/hr limitation shall be demonstrated by the performance testing as described in condition A.V.1 and continuous emission monitoring requirement as described in terms A.III.3 - A.III.5. Compliance with the annual emission limitations shall be determined by the continuous emission monitoring requirement as described in terms A.III.3 - A.III.5.
  - b. PM: Compliance with the emission limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies (if applicable), and the operational parameters as submitted in the PTI application 14-05029 submitted 10/06/00.
  - c. SO<sub>2</sub>: Compliance with the emission limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies (if applicable), and the operational parameters as submitted in the PTI application 14-05029 submitted 10/06/00 and in AP-42 Chapter 3.1 (4/2000).
  - d. VOC: Compliance with the emission limitations outlined in this permit shall be demonstrated by the emission factors, control efficiencies (if applicable), and the operational parameters as submitted in the PTI application 14-05029 submitted 10/06/00.
  - e. CO: Compliance with the allowable outlet concentration and the lbs/hr limitation shall be demonstrated by the performance testing as described in condition A.V.1 and continuous emission monitoring requirement as described in terms A.III.6 - A.III.8. Compliance with the annual emission limitations shall be determined by the continuous emission monitoring requirement as described in terms A.III.6 - A.III.8.
  - f. Compliance with the visible emissions limitations established by this permit shall be determined by Method 9, 40 CFR Part 60 Appendix A.
3. The sulfur contents of the natural gas shall be determined using ASTM D 1072-80, D 3031-81, D 4084-82, or D 3246-81\*.
4. The heating values of the natural gas shall be determined using ASTM method D240\*.

\*Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to

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the approval of the Hamilton County Department of Environmental Services. The newest or most recent revisions to the applicable test method shall be used for these analyses. Alternative, equivalent methods may be used if they comply with the requirements specified in 40 CFR Part 60.13 and/or 40 CFR Part 75, or upon written approval by the Hamilton County Department of Environmental Services. The frequency of the sampling shall be such that it complies with the requirements specified in 40 CFR Part 60.334 and/or 40 CFR Part 75 or as approved by the Ohio EPA.

5. Compliance with the fuel usage limitation described in term A.II.3 shall be demonstrated by the record keeping requirements in term A.III.1.
6. Compliance with the sulfur content of the natural gas in term A.II.2 shall be demonstrated by the record keeping requirements in term A.III.12.
7. Compliance with the limit on the number of startup/shutdown cycles permitted per year shall be demonstrated by the record keeping requirements in term A.III.1.e.
8. Compliance with the limit on the amount of time for each startup/shutdown cycles per year shall be demonstrated by the record keeping requirements in term A.III.1.f.

## VI. Miscellaneous Requirements

1. Should this emissions unit be converted from a simple cycle to a combined cycle turbine in the future, a new BAT determination would be required.

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**B. State Only Enforceable Section**

**I. Applicable Emissions Limitations and/or Control Requirements**

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P002- 48 Megawatt (Nominal) Simple-Cycle Combustion Turbine #2	None	None

**2. Additional Terms and Conditions**

2.a None

**II. Operational Restrictions**

None

**III. Monitoring and/or Recordkeeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

1. Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions unit's maximum annual emissions for each toxic compound will be less than

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1.0 ton. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any pollutant that has a listed TLV to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.