



2/3/2015

Certified Mail

Mr. David Richardson
Robert P. Mone Plant
4406 Mentzer Road
Convoy, OH 45832

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0381000043
Permit Number: P0117511
Permit Type: Administrative Modification
County: Van Wert

Yes	TOXIC REVIEW
No	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
Yes	CEMS
No	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. 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 PTI 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 Ohio EPA DAPC, Northwest District Office at (419)3528461 or 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: U.S. EPA
Ohio EPA-NWDO; Michigan; Indiana



FINAL

**Division of Air Pollution Control
Permit-to-Install
for
Robert P. Mone Plant**

Facility ID:	0381000043
Permit Number:	P0117511
Permit Type:	Administrative Modification
Issued:	2/3/2015
Effective:	2/3/2015



Division of Air Pollution Control
Permit-to-Install
for
Robert P. Mone Plant

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Final Permit-to-Install
Robert P. Mone Plant
Permit Number: P0117511
Facility ID: 0381000043
Effective Date: 2/3/2015

Authorization

Facility ID: 0381000043
Facility Description: Peaking Station
Application Number(s): M0002968
Permit Number: P0117511
Permit Description: Administrative modification to incorporate new Low Mass Emission (LME) provisions per recent revisions to acid rain regulations (40 CFR Part 75.19).
Permit Type: Administrative Modification
Permit Fee: \$1,500.00
Issue Date: 2/3/2015
Effective Date: 2/3/2015

This document constitutes issuance to:

Robert P. Mone Plant
4406 Mentzer Road
Convoy, OH 45832

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

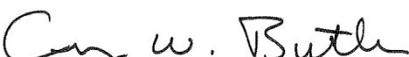
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Permit-to-Install for the 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 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


Craig W. Butler
Director



Authorization (continued)

Permit Number: P0117511
 Permit Description: Administrative modification to incorporate new Low Mass Emission (LME) provisions per recent revisions to acid rain regulations (40 CFR Part 75.19).

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

Group Name: Combustion Turbines

Emissions Unit ID:	P001
Company Equipment ID:	Unit 1 Combustion Turbine
Superseded Permit Number:	03-13410
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	Unit 2 Combustion Turbine
Superseded Permit Number:	03-13410
General Permit Category andType:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	Unit 3 Combustion Turbine
Superseded Permit Number:	03-13410
General Permit Category andType:	Not Applicable



Final Permit-to-Install
Robert P. Mone Plant
Permit Number: P0117511
Facility ID: 0381000043
Effective Date: 2/3/2015

A. Standard Terms and Conditions



1. Federally Enforceable Standard Terms and Conditions

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
 - (1) Standard Term and Condition A.2.a), Severability Clause
 - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
 - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
 - (4) Standard Term and Condition A.9., Reporting Requirements
 - (5) Standard Term and Condition A.10., Applicability
 - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
 - (7) Standard Term and Condition A.14., Public Disclosure
 - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
 - (9) Standard Term and Condition A.16., Fees
 - (10) Standard Term and Condition A.17., Permit Transfers

2. Severability Clause

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

- a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.
- 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, 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 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.

4. Monitoring and Related Record Keeping and Reporting Requirements

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
 - (1) The date, place (as defined in the permit), and time of sampling or measurements.
 - (2) The date(s) analyses were performed.
 - (3) The company or entity that performed the analyses.
 - (4) The analytical techniques or methods used.
 - (5) The results of such analyses.
 - (6) The operating conditions existing at the time of sampling or measurement.
- 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:
 - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.
 - (2) 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 Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

- (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northwest District Office every six months, 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.
 - (4) This permit is for an emissions unit located at a Title V facility. 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.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

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

6. Compliance Requirements

- a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted 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 electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

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:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
 - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
 - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
 - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
 - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. 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.



9. Reporting 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 Ohio EPA DAPC, Northwest District Office.
- 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 Ohio EPA DAPC, Northwest District Office. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. 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) not exempt from the requirement to obtain a Permit-to-Install.

11. Construction of New Sources(s) and Authorization to Install

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. 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 this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit 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.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. 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 permittee shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

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

13. Construction Compliance Certification

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.



- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. 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.

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

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

16. 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 any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

18. 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.

19. 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.



Final Permit-to-Install
Robert P. Mone Plant
Permit Number: P0117511
Facility ID: 0381000043
Effective Date: 2/3/2015

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
 - a) B.5 and B.6.
2. The permittee shall ensure that any CAIR NO_x, SO₂, or NO_x ozone season units comply with the requirements of OAC 3745-109, which includes submitting timely permit applications. The permittee shall ensure that the affected emissions units comply with those requirements as outlined in the permit application submitted as required by OAC rules 3745-109-03, 109-10 and 109-16 for the affected emissions units.
3. The permittee shall also comply with any subsequent federally mandated programs that may replace the CAIR program affecting electric generating facilities (see note in paragraph 4.a).
4. Clean Air Interstate Rule – OAC Chapter 3745-109.
 - a) Facility Code – 0381000043.
 - (1) P001
 - (2) P002
 - (3) P003

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

[OAC rules 3745-14-08(A)(2)(c) and 3745-14-08(A)(2)(d)]

5. The permit to install for these emissions units (P001, P002, and P003) were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: formaldehyde
TLV (ug/m3): 273 (converted from STEL)
Maximum Hourly Emission Rate (lbs/hr): 3.9*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3.23
MAGLC (ug/m3): 6.49

Pollutant: sulfuric acid
TLV (ug/m3): 1000
Maximum Hourly Emission Rate (lbs/hr): 33.0*



Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.983
MAGLC (ug/m3): 23.8

* For emissions units P001, P002, and P003 combined

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

- a) changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;
 - b) changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and
 - c) physical changes to the emissions unit or its exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).
6. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01(VV)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition (other than (VV)(1)(a)(ii)), then the permittee shall obtain a final permit to install prior to the change.

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

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



Final Permit-to-Install
Robert P. Mone Plant
Permit Number: P0117511
Facility ID: 0381000043
Effective Date: 2/3/2015

C. Emissions Unit Terms and Conditions



1. Emissions Unit Group -Combustion Turbines: P001, P002, P003

EU ID	Operations, Property and/or Equipment Description
P001	GE-7FA simple cycle combustion turbine, 167 MW (nominal)
P002	GE-7FA simple cycle combustion turbine, 167 MW (nominal)
P003	GE-7FA simple cycle combustion turbine, 167 MW (nominal)

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
- (1) See Facility-Wide Term and Condition B.1.
- 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)	Best Available Technology (BAT) Requirements See b)(2)a below - BAT control requirements. See b)(2)e below - other rules included as part of BAT. <u>BAT emission limitations:</u> When firing natural gas, during non-startup and shutdown operations, emissions from each emissions unit P001-P003, individually shall not exceed: 9 ppmvd of nitrogen oxides (NOx) at 15% oxygen (at full load, as a 1-hour average) 65.0 lbsNOx/hr 12.0 lbs sulfur dioxide (SO2)/hr 32.0 lbs carbon monoxide (CO)/hr 3.2 lbs volatile organic compounds



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>(VOC)/hr</p> <p>21.3 lbs particulate emissions (PE)/hr</p> <p>1.30 lbs formaldehyde/hr</p> <p>Visible PE shall not exceed 10% opacity, as a six-minute average, when firing natural gas.</p> <p>When firing No. 2 oil/distillate oil, during non-startup and shutdown operations, emissions from each emissions unit, P001-P003, individually, shall not exceed:</p> <p>42 ppmvdNOx at 15% oxygen (at full load, as a 1-hour average)</p> <p>347.0 lbsNOx/hr</p> <p>107.0 lbs SO2/hr</p> <p>72.0 lbs CO/hr</p> <p>8.0 lbs VOC/hr</p> <p>37.0 lbs PE/hr</p> <p>0.50 lb formaldehyde/hr</p> <p>Startup and shutdown emissions from emissions units P001-P003, combined, shall not exceed the following limitations:</p> <p>140.20 tons CO/yr</p> <p>22.0 tons NOx/yr</p> <p>11.0 tons VOC/yr</p> <p>(See b)(2f)</p>
b.	OAC rule 3745-31-05(D)	<p>Special Terms and Conditions</p> <p>See c)(1) through c)(5) below – operational restrictions</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Emissions from emissions units P001, P002, and P003, combined, shall not exceed the following limitations per rolling, 12-month period:: 74.9 tons SO ₂ per rolling, 12-month period 242.3 tons CO per rolling, 12-month period 243.0 tons NO _x per rolling, 12-month period 79.6 tons PE per rolling, 12-month period 4.90 tons formaldehyde per rolling, 12-month period 21.2 tons VOC per rolling, 12-month period
c.	OAC rule 3745-17-07(A)	When firing No. 2 oil/distillate oil, visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as specified by rule.
d.	40 CFR, Part 60, Subpart GG	See b)(2)c.
e.	OAC rule 3745-18-06(F)	See b)(2)b.
f.	OAC rule 3745-17-11(B)(4)	See b)(2)b.
g.	OAC chapter 3745-103	See b)(2)d.
h.	40 CFR Parts 72 and 75	See b)(2)d and d)(7).

(2) Additional Terms and Conditions

- a. The permittee shall install, operate and maintain dry low NO_x burners and a water injection system on each emissions unit P001-P003.
- 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).
- c. The emission limitation and sulfur content restriction specified by this applicable rule are less stringent than the emission limitation and sulfur content restriction established pursuant to OAC rule 3745-31-05(A)(3). Except as provided for in the terms and conditions of this permit, the permittee is not exempt from meeting any additional requirements of 40 CFR Part 60 Subpart GG.



- d. The permittee shall ensure that any affected emissions unit complies with the requirements established under 40 CFR Parts 72 and 75 concerning acid rain. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
 - e. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-31-05(D) and, when firing No. 2 oil/distillate oil, OAC rule 3745-17-07(A).
 - f. The annual emission limitations for startup and shutdown emissions apply for both the firing of natural gas and No. 2 oil/distillate oil.
 - g. "Full load" shall be defined as the electrical output at the maximum achievable fuel flow rate to each emissions unit for the ambient and equipment conditions during any operating hour. Any actual electrical output within 10% of the calculated electrical output shall be considered full load.
 - h. Startup is defined as the period of time from the initiation of combustion firing to the attainment of a steady-state operating condition (dry low NO_x(premix) mode as indicated by DAHS). Premix mode shall be defined as the low emissions mode during which all burner nozzles are in use, burning a lean premix gas for steady-state operation. Shutdown is defined as that period of time from the end of a steady-state operating condition to the complete cessation of fuel combustion in the unit.
- c) Operational Restrictions
- (1) The maximum annual hours of operation for emissions units P001-P003, combined, shall not exceed any of the following:
 - a. 7477 hours per rolling, 12-month period when firing natural gas;
 - b. 1400 hours per rolling, 12-month period when firing No. 2 oil/distillate oil; and
 - c. 7477 cumulative hours of operation per rolling, 12-month period for the firing of natural gas and No. 2 oil/distillate oil, where:
 - 1 hour of operation firing natural gas = 1.0 hour of operation; and
 - 1 hour of operation firing No. 2 oil/distillate oil = 5.34 hours of operation.

To ensure enforceability during the first 12 calendar months of operation following the initial startup of emissions unit P001, P002, or P003, the permittee shall not exceed the cumulative hourly operational restrictions specified in the following table:



Month	Cumulative hours of firing natural gas & #2 oil/distillate oil
1	1800
2	3600
1-3	5400
1-4	7200
1-12	7477

After the first 12 calendar months of operation, compliance with the cumulative annual hourly operational restriction shall be based upon a rolling, 12-month summation of the cumulative hourly operating data. Startup and shutdown periods are to be included in these cumulative hourly operational restrictions.

- (2) With the exception of startup and shutdown periods, emissions units P001-P003 shall be operated at a minimum of 50% of full load. The permittee may petition the Ohio EPA, Northwest District Office (NWDO) to operate at a greater load range if it can be demonstrated to the Agency's satisfaction that each emissions unit will comply with all applicable emission limitations in this permit and the modeling requirements specified in Engineering Guide #69.
 - (3) The permittee shall fire only natural gas and No. 2 oil/distillate oil in emissions units P001-P003.
 - (4) The maximum sulfur content of the natural gas shall not exceed 0.007% by weight. The maximum sulfur content of the No. 2 oil/distillate oil shall not exceed 0.05% by weight.
 - (5) The permittee shall be limited to 550 startups and 550 shutdowns for emissions units P001-P003, combined, per rolling, 12-month period.
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records of the following information for emissions units P001, P002, and P003, combined:
 - a. The number of hours of operation when firing natural gas;
 - b. The number of hours of operation when firing No. 2 oil/distillate oil;
 - c. During the first 12 calendar months of operation, the cumulative hours of operation when firing natural gas and No. 2 oil/distillate oil;
 - d. After the first 12 calendar months of operation, the rolling, 12-month summations of the hours of operation when firing natural gas, when firing No. 2 oil/distillate oil,



and the cumulative hours of operation when firing natural gas and No. 2 oil/distillate oil;

- e. The number of startups and shutdowns;
- f. The duration of each startup and shutdown;
- g. The startup and shutdown emissions* for NO_x, VOC and CO, in tons;
- h. The emission rates* for PE, NO_x, SO₂, CO, VOC and formaldehyde, in tons;
- i. During the first 12 calendar months of operation, the cumulative emission rates for PE, NO_x, SO₂, CO, VOC and formaldehyde (including startup and shutdown emissions for NO_x, CO and VOC), in tons, and
- j. After the first 12 calendar months of operation, the rolling, 12-month summations of the emission rates for PE, NO_x, SO₂, CO, VOC, and formaldehyde (including startup and shutdown emissions for NO_x, CO, and VOC) in tons.

*The permittee shall use the continuous NO_x emission monitoring data to determine the NO_x emissions for these emissions units or use an excepted monitoring system that meets the requirements of 40 CFR 75.19 (LME). During any period when the continuous NO_x emission monitoring systems are being used and are not operational, the permittee shall use the appropriate missing data procedures specified in 40 CFR Part 75 to determine the NO_x emissions. The permittee shall use the most recent emission test data multiplied by the hours of operation to determine the PE, CO, VOC and formaldehyde emissions for these emissions units. The permittee shall use the most recent emission test data or the fuel flow and fuel sulfur content data to determine the SO₂ emissions for these emissions units. The following permittee-supplied emission factors may be used to determine the CO and VOC emissions during each emissions unit startup and shutdown; for natural gas (No. 2 oil/distillate oil) startups; 360.0 (220.0) lbs CO/hr and 20.0 (20.0) lbs VOC/hr, and for shutdowns; 150 (120) lbs CO/hr and 20.0 (20.0) lbs VOC/hr.

- (2) For each day during which the permittee fires a fuel other than natural gas or No. 2 oil/distillate oil, the permittee shall maintain a record of the type and quantity of fuel fired in emissions units P001-P003, individually.
- (3) The permittee shall install, operate and maintain equipment to continuously monitor and record the fuel flow to this emissions unit when the emissions unit is in operation. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75. If the fuel flow monitoring and/or recording equipment is (are) not in service when the emissions units are in operation, the permittee shall comply with the appropriate missing data procedures specified in 40 CFR Part 75.
- (4) Except as provided below, the permittee shall comply with the fuel monitoring and testing provisions specified in 40 CFR Part 60.334 and 40 CFR Part 60.335. In lieu of complying with the aforementioned fuel sulfur content monitoring and testing provisions, the permittee may elect to comply with the applicable monitoring and testing



requirements specified in 40 CFR Part 75, Appendix D, Sections 2.2 and 2.3 for fuel oil and natural gas, respectively.

Where applicable, the permittee shall maintain records of the sulfur contents and heating values of the fuels fired in each emissions unit. ASTM D2880, D129, D1552, D2622, or D4294 shall be used to determine the sulfur content of the fuel oil and ASTM D1072, D3031, D4084, D4468, D5504, or D3246 shall be used to determine the sulfur content of the natural gas. ASTM D240 shall be used to determine the heat value of the fuel oil and ASTM D1826, D3588, or D4891 shall be used to determine the heat value of the natural gas. The most recent revisions to the applicable test method shall be used for these analyses. Alternative, equivalent methods may be used upon written approval by the Ohio EPA, NWDO.

(5) Continuous Emission Monitoring

- a. Prior to the installation of the continuous NO_x 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 2 for approval by the Ohio EPA, Central Office.
- b. Within 60 days after achieving full load, but not later than 180 days after the initial 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 2, and/or 40 CFR Part 75, unless an extension is granted by the Ohio EPA. Personnel from the Ohio EPA, NWDO 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 Ohio EPA, NWDO within 30 days after the test is completed. Copies of the test results shall be sent to the Ohio EPA, NWDO. Certification of the continuous NO_x 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 2 and/or 40 CFR Part 75.
- c. The permittee shall install, operate and maintain equipment to continuously monitor and record NO_x from each emissions unit in the units of the applicable standards or use an excepted monitoring system that meets the requirements of 40 CFR 75.19 (LME) to monitor and record NO_x from each emissions unit in the units established in this permit. If used, such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13 and/or 40 CFR Part 75.
- d. If a continuous monitoring system is used, the permittee shall maintain records of the following data obtained by the continuous NO_x monitoring system: ppmvd NO_x at 15% oxygen, at full load (hourly average), lbs of NO_x/hr, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.



- e. If a continuous monitoring system is used, 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_x monitoring system designed to ensure continuous valid and representative readings of NO_x emissions in units of the applicable standards. 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_x monitoring system must be kept on site and available for inspection during regular office hours.
- (6) In lieu of installing an oxygen monitor as part of the NO_x monitoring system, which is used to demonstrate compliance with the full load (as defined in b)(2)g) NO_x emission limitations (9ppmvd at 15% oxygen as a 1-hr average when firing natural gas and 42ppmvd at 15% oxygen as a 1-hr average when firing #2 oil/distillate oil), the permittee made a request to install a carbon dioxide monitor and agreed to demonstrate, through U.S. EPA-approved emission tests, that the NO_x monitoring system (nitrogen oxides analyzer and carbon dioxide monitor) would provide accurate data in the units of the applicable standards. The permittee installed the carbon dioxide monitor, and on July 16, 2002, the permittee successfully completed the monitoring system accuracy demonstration.
 - (7) The installation and operation of systems to continuously monitor and record emissions of NO_x and the carbon dioxide content of the exhaust gasses or the monitoring provisions in 40 CFR 75.19 may be performed in lieu of continuously monitoring the ratio of water to fuel fired in the turbine and monitoring the nitrogen content of the fuel being fired in the turbine, as required by 40 CFR Part 60.334.
 - (8) The permittee shall maintain records that document the following:
 - a. The calculated full load for each operating hour;
 - b. The emissions unit's actual electrical output for each operating hour;
 - c. All periods of time when the emissions unit's actual electrical output was within 10% of the calculated full load; and
 - d. All periods of time when the emissions unit was operated at less than 50% of full load.
- e) Reporting Requirements
- (1) The permittee shall submit quarterly deviation (excursion) reports that identify each day when a fuel other than natural gas or #2 oil/distillate oil was burned in this emissions unit.
 - (2) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the rolling, 12-month hours of operation limitations and, for the first 12 calendar months of operation, all exceedances of the maximum allowable hours of operation.



- (3) The permittee shall submit quarterly reports that identify each period during which an exemption for ice-fog provided in 40 CFR Part 60.332(f) is in effect. The report shall include the ambient conditions existing during the period, the date and time the air pollution control system was deactivated, and the date and time when the air pollution control system was reactivated.
- (4) The permittee shall submit quarterly deviation (excursion) reports that identify any record which shows that the sulfur content of the natural gas exceeded 0.007%, by weight, or the sulfur content of the #2 oil/distillate oil exceed 0.05%, by weight.
- (5) Continuous NOx Emission Reporting
 - a. Pursuant to OAC rule 3745-15-04, ORC sections 3704.03(l) and 3704.031, and 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, NWDO documenting the date, commencement and completion times, duration, magnitude, reason (if known) , and corrective actions taken (if any), of all instances of NOx values in excess of the applicable emission limitations specified in the terms and conditions of this permit (65.0 lbs/hr and 9 ppmvd at 15% oxygen (at full load (as defined in b)(2)g), as a 1-hr average) when firing natural gas and 347.0 lbs/hr and 42 ppmvd at 15% oxygen (at full load (as defined in b)(2)g), as a 1-hr average) when firing #2 oil/distillate oil). These reports shall also contain the total NOx emissions for the calendar quarter (in tons).
 - b. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, NWDO documenting any continuous NOx monitoring system (if used) 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 (if used) while the emissions unit was on line shall also be included in the quarterly report.
 - c. If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system(if used)malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer (if used)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.
 - d. Pursuant to OAC rule 3745-15-04, and ORC sections 3704.03(l) and 3704.031, the permittee shall submit a summary of the excess emission report pursuant to 40 CFR Part 60.7. The summary shall be submitted to the Ohio EPA, NWDO within 30 days following the end of each calendar quarter in a manner prescribed by the Director.



- (6) The permittee shall submit quarterly deviation (excursion) reports that identify each time when this emissions unit was not in compliance with the emissions unit operating load requirements of condition c)(2) above.
- (7) In lieu of the excess emissions reports required under 40 CFR Part 60.334, the permittee shall submit excess and emissions reports for each emissions unit P001, P002, and P003, individually, in accordance with this permit.
- (8) The quarterly deviation (excursion) reports shall be submitted in accordance with General Term and Condition A.1.c of this permit.
- (9) These emissions units, P001-P003, are subject to the applicable provisions of 40 CFR Part 60, Subpart GG of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

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 date (no later than 30 days after such date);
- b. actual startup date (within 15 days after such date); and
- c. 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, Ohio 43216-3669

and

Ohio Environmental Protection Agency
Northwest District Office
Division of Air Pollution Control
347 North Dunbridge Road
Bowling Green, Ohio 43402

f) Testing Requirements

- (1) The permittee shall conduct, or have conducted, emission testing for these emissions units in accordance with the following requirements (These testing requirements were fulfilled by tests performed on July 16 and 18, 2002 for emission unit P001; July 23-24, 2002 for emission unit P002; and July 30-August 1, 2002 for emission unit P003) :
 - a. The emission testing shall be conducted within 60 days after achieving full load, but not later than 180 days after initial startup of this emissions unit.



- b. The emission testing shall be conducted to demonstrate compliance with the NO_x outlet concentrations, and the mass emission limitations for NO_x, CO, VOC, and PE, while firing both natural gas and #2 oil/distillate oil. Emission testing shall be conducted to demonstrate compliance with the mass emission limitation for formaldehyde while firing natural gas.
 - c. The following test method(s) shall be employed to demonstrate compliance with the above emission limitations: for NO_x, Method 20 of 40 CFR Part 60, Appendix A; for PE, Method 5 of 40 CFR Part 60, Appendix A; for formaldehyde, SW-846 Method 0011; for VOC Method 25 of 40 CFR Part 60, Appendix A; SO₂ Method 6 of 40 CFR Part 60, Appendix A; and for CO Method 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.
 - d. The testing shall be performed at full load, as defined in b)(2)g, unless otherwise specified or approved by the Ohio EPA, NWDO.
 - e. Not later than 45 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. 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 tests, 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 Ohio EPA, NWDO refusal to accept the results of the emission tests.
 - f. Personnel from the Ohio EPA, NWDO 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 emission tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.
 - h. In lieu of the test methods and procedures required under 40 CFR Part 60.335, the permittee shall follow the testing requirements specified in this permit.
- (2) Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:
- a. Emission Limitations
when firing natural gas:
65.0 lbs of NO_x/hr
9 ppmvd of NO_x at 15% oxygen (at full load, as a 1-hr average)

when firing #2 oil/distillate oil:



347.0 lbs of NO_x/hr
42 ppmvd of NO_x at 15% oxygen (at full load, as a 1-hr average)

Applicable Compliance Method

Initial compliance with the allowable mass emission limitations and outlet concentrations shall be demonstrated by the emission testing as described in condition f)(1), with the continued compliance demonstrated by the unbiased actual continuous emission monitoring data or by the excepted monitoring system data obtained per the requirements described in conditions d)(5) and d)(6).

b. Emission Limitations
when firing natural gas:

21.3 lbs of PE/hr
12.0 lbs of SO₂/hr
3.2 lbs of VOC/hr
32.0 lbs of CO/hr

when firing #2 oil/distillate oil:

37.0 lbs of PE/hr
107.0 lbs of SO₂/hr
8.0 lbs of VOC/hr
72.0 lbs of CO/hr

Applicable Compliance Method

Compliance with the hourly mass emission limitations shall be demonstrated by the emission testing as described in condition f)(1).

In lieu of conducting SO₂ emission tests, the permittee may determine the applicable SO₂ emission rate by monitoring the fuel flow to the emissions unit in accordance with condition d)(3) and sampling the sulfur content of the fuel in accordance with condition d)(4). If required, the permittee shall demonstrate compliance with the applicable SO₂ emission limitations through emission tests performed in accordance with condition f)(1)c.

c. Emission Limitations
when firing natural gas:

1.3 lbs of formaldehyde/hr

when firing #2 oil/distillate oil:

0.5 lb of formaldehyde/hr

Applicable Compliance Method

Compliance with the hourly mass emission limitation when firing natural gas shall be demonstrated by the emission testing as described in condition f)(1). Compliance with the hourly mass emission limitation when firing #2 oil/distillate oil may be demonstrated by the multiplying the AP-42 emission factor of .00028 lb of formaldehyde/mmBtu (Section 3.1, Table 3.1-4, 4/00) by the emissions unit's maximum heat input (1946.3 mmBtu/hr). If required, the permittee shall



demonstrate compliance with this emission limitation through emission tests performed in accordance with condition f)(1).

d. Emission Limitation

Visible particulate emissions, when firing natural gas, shall not exceed 10% opacity as a 6-minute average.

Applicable Compliance Method

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

e. Emission Limitation

Visible particulate emissions, when firing #2 oil/distillate oil, shall not exceed 20% opacity as a 6-minute average.

Applicable Compliance Method

Compliance with this emission limitation shall be determined through visible emissions observations performed in accordance with the procedures specified in OAC rule 3745-17-03(B)(1).

f. Emission Limitations

startup and shutdown emissions:

140.2 tons of CO/yr
20.4 tons of NO_x/yr
11.0 tons of VOC/yr

Applicable Compliance Method

Compliance with the annual emission limitations shall be determined by the record keeping required in condition d)(1).

g. Emission Limitations

74.9 tons of SO₂ per rolling, 12-month period
242.3 tons of CO per rolling, 12-month period
243.0 tons of NO_x per rolling, 12-month period
79.6 tons of PE per rolling, 12-month period
21.2 tons of VOC per rolling, 12-month period
4.9 tons of formaldehyde per rolling, 12-month period

Applicable Compliance Method

Compliance with the rolling, 12-month emission limitations shall be determined by the record keeping required in condition d)(1).

g) Miscellaneous Requirements

- (1) Should one or all of these emissions units be converted from a simple cycle to a combined cycle turbine in the future, a new BAT determination would be required.



Final Permit-to-Install
Robert P. Mone Plant
Permit Number: P0117511
Facility ID: 0381000043
Effective Date: 2/3/2015