Ohio Environmental Protection Agency

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

6/17/2015

Certified Mail

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

Mr. John Fuoto
Project Marble
13461 Sunrise Valley Drive
Suite 510
Herndon, VA 20171

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0125124016
Permit Number: P0118835
Permit Type: Initial Installation
County: Franklin

Dear Permit Holder:

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

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

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael E. Hopkins, P.E.
Assistant Chief, Permitting Section, DAPC

Cc: Ohio EPA-CDO

Response to Comments

Facility ID:	0125124016
Facility Name:	Project Marble
Facility Description:	Data Center
Facility Address:	5109 Hayden Run Rd Hilliard, OH 43026 Franklin County
Permit:	P0118835, Permit-To-Install and Operate - Initial Installation
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Columbus Dispatch on 05/16/2015. The comment period ended on 06/15/2015.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

No comments were received.

Ohio Environmental Protection Agency

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
Project Marble

Facility ID:	0125124016
Permit Number:	P0118835
Permit Type:	Initial Installation
Issued:	6/17/2015
Effective:	6/17/2015
Expiration:	6/17/2020

Ohio Environmental Protection Agency

Division of Air Pollution Control
Permit-to-Install and Operate
for
Project Marble

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Authorization

Facility ID:	0125124016
Application Number(s):	A0053306
Permit Number:	P0118835
Permit Description:	Initial permit for 90 stationary emergency generators burning ultra-low sulfur diesel with federally enforceable limitations.
Permit Type:	Initial Installation
Permit Fee:	$36,000.00
Issue Date:	6/17/2015
Effective Date:	6/17/2015
Expiration Date:	6/17/2020

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

Project Marble
5109 Hayden Run Rd
Hilliard, OH 43026

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

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

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

Authorization (continued)

Permit Number: P0118835
Permit Description: Initial permit for 90 stationary emergency generators burning ultra-low sulfur diesel with federally enforceable limitations.

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

Group Name: 2,500 ekW emergency generators

Emissions Unit ID:	**P001**
Company Equipment ID:	1
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	2
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P003**
Company Equipment ID:	3
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P004**
Company Equipment ID:	4
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P005**
Company Equipment ID:	5
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P006**
Company Equipment ID:	6
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P007**
Company Equipment ID:	7
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P008**
Company Equipment ID:	8
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P009**
Company Equipment ID:	9
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P010**
Company Equipment ID:	10
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P011**
Company Equipment ID:	11

Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P012**
Company Equipment ID:	12
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P013**
Company Equipment ID:	13
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P014**
Company Equipment ID:	14
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P015**
Company Equipment ID:	15
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P016**
Company Equipment ID:	16
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P017**
Company Equipment ID:	17
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P018**
Company Equipment ID:	18
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P019**
Company Equipment ID:	19
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P020**
Company Equipment ID:	20
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P021**
Company Equipment ID:	21
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P022**
Company Equipment ID:	22
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P023**
Company Equipment ID:	23
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P024**
Company Equipment ID:	24
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P025**
Company Equipment ID:	25

Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P026**
Company Equipment ID:	26
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P027**
Company Equipment ID:	27
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P028**
Company Equipment ID:	28
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P029**
Company Equipment ID:	29
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P030**
Company Equipment ID:	30
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P031**
Company Equipment ID:	31
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P032**
Company Equipment ID:	32
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P033**
Company Equipment ID:	33
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P034**
Company Equipment ID:	34
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P035**
Company Equipment ID:	35
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P036**
Company Equipment ID:	36
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P037**
Company Equipment ID:	37
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P038**
Company Equipment ID:	38
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P039**
Company Equipment ID:	39

Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P040**
Company Equipment ID:	40
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P041**
Company Equipment ID:	41
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P042**
Company Equipment ID:	42
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P043**
Company Equipment ID:	43
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P044**
Company Equipment ID:	44
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P045**
Company Equipment ID:	45
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P046**
Company Equipment ID:	46
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P047**
Company Equipment ID:	47
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P048**
Company Equipment ID:	48
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P049**
Company Equipment ID:	49
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P050**
Company Equipment ID:	50
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P051**
Company Equipment ID:	51
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P052**
Company Equipment ID:	52
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P053**
Company Equipment ID:	53

Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P054**
Company Equipment ID:	54
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P055**
Company Equipment ID:	55
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P056**
Company Equipment ID:	56
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P057**
Company Equipment ID:	57
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P058**
Company Equipment ID:	58
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P059**
Company Equipment ID:	59
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P060**
Company Equipment ID:	60
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P061**
Company Equipment ID:	61
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P062**
Company Equipment ID:	62
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P063**
Company Equipment ID:	63
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P064**
Company Equipment ID:	64
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P065**
Company Equipment ID:	65
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P066**
Company Equipment ID:	66
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P067**
Company Equipment ID:	67

Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P068**
Company Equipment ID:	68
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P069**
Company Equipment ID:	69
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P070**
Company Equipment ID:	70
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P071**
Company Equipment ID:	71
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P072**
Company Equipment ID:	72
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P073**
Company Equipment ID:	73
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P074**
Company Equipment ID:	74
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P075**
Company Equipment ID:	75
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P076**
Company Equipment ID:	76
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P077**
Company Equipment ID:	77
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P078**
Company Equipment ID:	78
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P079**
Company Equipment ID:	79
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P080**
Company Equipment ID:	80
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P081**
Company Equipment ID:	81

Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P082**
Company Equipment ID:	82
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P083**
Company Equipment ID:	83
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P084**
Company Equipment ID:	84
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P085**
Company Equipment ID:	85
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P086**
Company Equipment ID:	86
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P087**
Company Equipment ID:	87
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P088**
Company Equipment ID:	88
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P089**
Company Equipment ID:	89
Superseded Permit Number:	
General Permit Category andType:	Not Applicable
Emissions Unit ID:	**P090**
Company Equipment ID:	90
Superseded Permit Number:	
General Permit Category andType:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

7. What reports must I submit under this permit?

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

B. Facility-Wide Terms and Conditions

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

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

      (1) None.

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

      (1) 3. through 12.

2. Each rented roll-up emergency generator brought on site to temporarily operate in place of a permitted emissions unit must be permitted by the owner of the unit and operated in accordance with all applicable state and federal regulations. The emissions from each rented roll-up emergency generator brought on site must be tracked and counted toward the facility-wide, federally enforceable emissions limitations as required in B.3 through B.12 below.

3. The emissions of nitrogen oxide (NOx) from emissions units P001 through P090; all temporary, roll-up emergency generators; all de minimis emissions units as defined in OAC rule 3745-15-05; and all permit exempt and/or permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 99 tons per rolling, 12-month period.

4. The emissions of carbon monoxide (CO) from emissions units P001 through P090 and all temporary, roll-up emergency generators, combined, shall not exceed 53 tons per rolling, 12-month period.

5. The emissions of volatile organic compound (VOC) from emissions units P001 through P090 and all temporary, roll-up emergency generators, combined, shall not exceed 12 tons per rolling, 12-month period.

6. The emissions of PM_{10} and $PM_{2.5}$ from emissions units P001 through P090 and all temporary, roll-up emergency generators, combined, shall not exceed 4.0 tons per rolling, 12-month period.

7. The emergency generators shall burn only ultra low sulfur diesel (ULSD) that meets U.S. EPA's specifications found in 40 CFR 80.510(c).

8. The maximum facility-wide ULSD fuel usage shall be limited by the following formulas for each rolling, 12-month period:

$$99\ tons of NO_x \geq \sum_{i=1}^{n} \frac{EF_{NO_x,i} Q_i}{2{,}000 \frac{lb}{ton}} + \sum_{j=1}^{n} NO_{x,j}$$

$$53\ tons of\ \mathrm{CO} \geq \sum_{i=1}^{n} \frac{EF_{CO,i}Q_i}{2{,}000\ \frac{lb}{ton}}$$

$$12\ tons of VOC \geq \sum_{i=1}^{n} \frac{EF_{VOC,i}Q_i}{2{,}000\ \frac{lb}{ton}}$$

$$4.0\ tons of PM_{10} \text{and } PM_{2.5} \geq \sum_{i=1}^{n} \frac{EF_{PM,i}Q_i}{2{,}000\ \frac{lb}{ton}}$$

where:

EF_i = the pollutant-specific emissions factor for the engine type, in lb/gal, for each emissions unit, P001 through P098 as well as each temporary, roll-up emergency generator, i, as provided in Table 1 and Table 2 below based on the manufacturer's design specifications in the permit application

Table 1: Emissions Factors for P001 through P090 (Caterpillar Model 3516C-HD)

Pollutant	Emissions Factor (lb/gal)
Nitrogen Oxide (NOx)	2.77×10^{-01}
Carbon Monoxide (CO)	1.48×10^{-01}
Volatile Organic Compound (VOC)	9.93×10^{-03}
Particulate Matter (PM_{10}/$PM_{2.5}$)	3.08×10^{-02}

Table 2: Emissions Factors for the Temporary, Roll-up Emergency Generators (Caterpillar Model 3516C)

Pollutant	Emissions Factor (lb/gal)
Nitrogen Oxide (NOx)	2.82×10^{-01}
Carbon Monoxide (CO)	1.51×10^{-01}
Volatile Organic Compound (VOC)	3.72×10^{-02}
Particulate Matter (PM_{10}/$PM_{2.5}$)	1.70×10^{-02}

Q_i = the number of gallons of ULSD fuel used by each emissions unit, P001 through P098 as well as each temporary, roll-up emergency generator, i, during the rolling, 12-month period

$NO_{x,j}$ = the rolling, 12-month NOx emissions, in tons, for each de minimis, permit exempt, and permit-by-rule emissions unit except for the temporary roll-up emergency generators, j

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

10. The permittee shall maintain monthly records of the following information:

    a) the number of gallons of ULSD fuel used by each emissions unit for P001 through P090 as well as each temporary, roll-up emergency generator;

    b) the rolling, 12-month summation of the number of gallons of ULSD fuel used by each emissions unit for P001 through P090 as well as each temporary, roll-up emergency generator;

    c) the rolling, 12-month summation of NOx emissions from emissions units P001 through P090; all temporary, roll-up emergency generators; all de minimis emissions units; all permit exempt emissions unit and all permit-by-rule emissions units, combined, in tons;

    d) the rolling, 12-month summation of CO emissions from emissions units P001 through P090 as well as all temporary, roll-up emergency generators, combined, in tons;

    e) the rolling, 12-month summation of VOC emissions from emissions units P001 through P090 as well as all temporary, roll-up emergency generators, combined, in tons; and

    f) the rolling, 12-month summation of PM_{10} and $PM_{2.5}$ emissions from emissions units P001 through P090 as well as all temporary, roll-up emergency generators, combined, in tons.

    The rolling, 12-month summation of emissions from emissions units P001 through P090 and the temporary, roll-up emergency generators shall be calculated using the emissions factors specified in Table 1 and Table 2 above.

11. The permittee shall submit quarterly deviation (excursion) reports that identify:

    a) all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping and/or testing requirements in this permit:

        (1) all deviations from the requirement to burn only ULSD in the emergency generators;

        (2) all exceedances of the rolling, 12-month ULSD fuel limitations specified in B.8. above;

        (3) all exceedances of the rolling, 12-month NOx emissions limitation;

        (4) all exceedances of the rolling, 12-month CO emissions limitation;

        (5) all exceedances of the rolling, 12-month VOC emissions limitation; and

        (6) all exceedances of the rolling, 12-month PM_{10} and $PM_{2.5}$ emissions limitations;

    b) the probable cause of each deviation (excursion);

    c) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

    d) the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, the permittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the director (Ohio EPA, Central District Office).

12. Emissions Limitations

The emissions of nitrogen oxide (NOx) from emissions units P001 through P090; all temporary, roll-up emergency generators; all de minimis emissions units as defined in OAC rule 3745-15-05; and all permit exempt and/or permit-by-rule emissions units pursuant to OAC rule 3745-31-03, combined, shall not exceed 99 tons per rolling, 12-month period.

The emissions of carbon monoxide (CO) from emissions units P001 through P090 and all temporary, roll-up emergency generators, combined, shall not exceed 53 tons per rolling, 12-month period.

The emissions of volatile organic compound (VOC) from emissions units P001 through P090 and all temporary, roll-up emergency generators, combined, shall not exceed 12 tons per rolling, 12-month period.

The emissions of PM_{10} and $PM_{2.5}$ from emissions units P001 through P090 and all temporary, roll-up emergency generators, combined, shall not exceed 4.0 tons per rolling, 12-month period.

Applicable Compliance Method

Compliance with these emissions limitations shall be determined through the recordkeeping requirements in B.10. using the emissions factors specified in Table 1 and Table 2 above.

13. 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 Central District Office and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the signatory authority may be represented as provided through procedures established in Air Services.

14. The Ohio EPA has determined that this facility may be subject to U.S. EPA standards for control of hazardous air pollutants (HAP), the National Emission Standards for Hazardous Air Pollutants (NESHAP), found in the Code of Federal Regulations, Title 40 Part 63. At this time the Ohio EPA is not accepting the delegating authority to enforce NESHAP standards for area sources. The requirements of this NESHAP, that are applicable to the area source(s) (for HAP) identified in this permit, shall be

enforceable by U.S. EPA. Region 5. The complete requirements of the applicable rule (including the Part 63 General Provisions) may be accessed via the Internet from the Electronic code of Federal Regulations (e-CFR) website http://www.ecfr.gov/ or by contacting the Ohio EPA, Central District Office.

C. Emissions Unit Terms and Conditions

17. Emissions Unit Group -2,500 ekW emergency generators: P001, P002, P003, P004, P005, P006, P007, P008, P009, P010, P011, P012, P013, P014, P015, P016, P017, P018, P019, P020, P021, P022, P023, P024, P025, P026, P027, P028, P029, P030, P031, P032, P033, P034, P035, P036, P037, P038, P039, P040, P041, P042, P043, P044, P045, P046, P047, P048, P049, P050, P051, P052, P053, P054, P055, P056, P057, P058, P059, P060, P061, P062, P063, P064, P065, P066, P067, P068, P069, P070, P071, P072, P073, P074, P075, P076, P077, P078, P079, P080, P081, P082, P083, P084, P085, P086, P087, P088, P089, P090

EU ID	Operations, Property and/or Equipment Description
P001 through P090	Stationary emergency generator set - Caterpillar Model 3516C-HD, standby rated at 2,500 ekW each

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

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

a. b)(1)i. and b)(2)h.

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

a. b)(1)g.

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 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
b.	OAC rule 3745-17-11(B)(5)(b)	Particulate emissions from the engine's exhaust shall not exceed 0.062 lb/MMBtu actual heat input.
c.	OAC rule 3745-18-06(G)	Sulfur dioxide emissions shall not exceed 0.5 lb/MMBtu actual heat input.
d.	OAC rule 3745-31-05(A)(3)	The Best Available Technology (BAT) requirements established pursuant to this

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	[Best Available Technology for NOx]	rule are equivalent to the requirements of 40 CFR Part 63, Subpart ZZZZ as they apply to NOx emissions.
e.	OAC rule 3745-31-05(A)(3) [Best Available Technology for CO, VOC, PM_{10}, $PM_{2.5}$and SO_2]	The BAT requirements of this rule also include compliance with the requirements of 40 CFR Part 63, Subpart ZZZZ. See b)(1)j., b)(1)l., b)(2)a. through b)(2)e. below.
f.	OAC rule 3745-31-05(A)(3)(a)(ii)	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO, VOC, PM_{10}, $PM_{2.5}$and SO_2emissions from this air contaminant source since the potentials to emit are less than 10 tons per year. See b)(2)f. below.
g.	OAC rule 3745-31-05(D) [Federally enforceable limitations to avoid Title V and NSR]	See 3. through 12. of Section B - Facility-Wide Terms and Conditions.
h.	OAC rule 3745-110-03	See b)(2)g. below.
i.	ORC 3704.03(F)(3)(c) and F(4) [Toxic Air Contaminant Statute]	See b)(2)h. below.
j.	40 CFR Part 60, Subpart IIII 40 CFR 60.4202(b)(2) 40 CFR 60.4205(b) Table 1 to 40 CFR 89.112, Tier 2 40 CFR 89.113	The exhaust emissions from this engine shall not exceed: 0.20 gram PM/kW-hr; 6.4 grams NOx + NMHC/kW-hr; 3.5 grams CO/kW-hr; 20 percent opacity during the acceleration mode; 15 percent opacity during the lugging mode; and 50 percent opacity during the peaks in either the acceleration or lugging modes. The fuel requirements established under this rule are less stringent than the fuel requirements established pursuant to 40 CFR 80.510(c). See b)(2)a. through b)(2)d. below.
k.	40 CFR Part 60, Subpart A	Table 8 to 40 CFR Part 60, Subpart IIII- "Applicability of General Provisions to Subpart IIII" identifies which parts of the General Provisions in 40 CFR Part 60.1-19 apply.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
l.	40 CFR Part 63, Subpart ZZZZ	The emissions unit shall meet the requirements of 40 CFR Part 60, Subpart IIII, for compression ignition engines.

(2) Additional Terms and Conditions

a. The emergency stationary compression ignition (CI) internal combustion engine (ICE) is subject to and shall be operated in compliance with the requirements of 40 CFR Part 60, Subpart IIII, the standards of performance for stationary CI ICE.

b. The emergency stationary CI ICE has been or shall be purchased certified by the manufacturer to emission standards as stringent as those identified in 40 CFR 60.4202(b)(2) and found in Tier 2 of 40 CFR 89.112, Table 1, for engines greater than or equal to 750 horsepower (560 kilowatt) and certified to the opacity standards found in 40 CFR 89.113.

c. The emergency stationary ICE must comply with the applicable requirements specified in 40 CFR 60.4211(f) in order to be considered an emergency stationary ICE under Part 60, Subpart IIII.

d. The fuel burned in this emissions unit shall meet U.S. EPA's specifications for Ultra Low Sulfur Diesel (ULSD) found in 40 CFR 80.510(c).

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

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

g. The emergency stationary CI ICE shall not be operated in any consecutive 12-month period to equal or exceed 500 hours of operation. If the engine is operated to equal or exceed 500 hours of operation during any consecutive 12-month period, the NOx emissions shall not exceed 3.0 g/hp-hr; and the permittee shall demonstrate compliance in accordance with OAC 3745-110-05.

h. Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified permit 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 toxic air contaminant to

increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit.

c) Operational Restrictions

(1) The emergency stationary CI ICE shall be installed, operated, and maintained according to the manufacturer's emission-related written instructions and the permittee shall only change those emission–related settings that are allowed by the manufacturer. The CI ICE must also be installed and operated to meet the applicable requirements from 40 CFR Part 89, Control of Emissions from New and In-use Non-road CI ICE; and Part 1068, the General Compliance Provisions for Engine Programs. The permittee shall operate and maintain the stationary CI ICE to achieve the emissions standards established in 40 CFR 60.4205 over the entire life of the engine(s).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the manufacturer's certification, to the applicable Tier 2 emission standards in Table 1 of 40 CFR 89.112, on site or at a central location for all facility ICE and it shall be made available for review upon request. If the manufacturer's certification is not kept on site, the permittee shall maintain a log for the location of each ICE and it shall identify the agency-assigned emissions unit number, the manufacturer's identification number, and the identification number of the certificate. The manufacturer's operations manual and any written instructions or procedures developed by the permittee and approved by the manufacturer shall be maintained at the same location as the ICE.

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

(3) For each day during which the permittee burns a fuel other than ULSD, the permittee shall maintain a record of the type, percent sulfur content, and quantity of fuel burned in this emissions unit.

(4) The permittee shall maintain monthly records of the following information:

a. the total number of hours the engine was in operation;

b. the number of hours spent in emergency operation;

c. what classified the operation as an emergency;

d. the number of hours spent in non-emergency operation;

e. the number of hours in maintenance checks and readiness testing; and

f. the rolling, 12-month summation of the number of hours the engine was in operation.

e) Reporting Requirements

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

f) Testing Requirements

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

a. Emissions Limitation

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Reference Method 9 in 40 CFR Part 60, Appendix A.

b. Emissions Limitation

Particulate emissions from the engine's exhaust shall not exceed 0.062 lb/MMBtu actual heat input.

Applicable Compliance Method

Compliance shall be determined based on the manufacturer's specification sheet as follows.

PE = (0.41 lb of PE/hr) / (23.73 MMBtu/hr) = 0.017 lb of PE/MMBtu

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

c. Emissions Limitation

Sulfur dioxide emissions shall not exceed 0.5 lb/MMBtu actual heat input.

Applicable Compliance Method

Compliance shall be determined using documents required in d)(2) above. Emissions of sulfur dioxide shall be calculated in accordance with OAC rule 3745-18-04(F)(2) using the maximum fuel sulfur content of 15 ppm.

If required, the permittee shall perform sulfur content analysis of a fuel sample in accordance with 40 CFR 580 using the appropriate ASTM method(s).

d. Emissions Limitations

The exhaust emissions from this engine shall not exceed:
0.20 gram PM/kW-hr;
6.4 grams NOx + NMHC/kW-hr;
3.5 grams CO/kW-hr;
20 percent opacity during the acceleration mode;
15 percent opacity during the lugging mode; and
50 percent opacity during the peaks in either the acceleration or lugging modes.

Applicable Compliance Method

Compliance with the emissions limitations shall be based on the manufacturer's certification and by maintaining the engine according to the manufacturer's instructions.

g) Miscellaneous Requirements

(1) None.