Ohio Environmental Protection Agency

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

10/20/2015

Genevieve Damico *Via E-Mail Notification*
United States Environmental Protection Agency
Mail Code: AR-18J
77 West Jackson Blvd.
Chicago, IL 60604-3507

RE: PROPOSED AIR POLLUTION TITLE V PERMIT
Facility Name: Richland Substation Peaker Facility
Facility ID: 0320010006
Permit Type: Renewal
Permit Number: P0118546

Dear Ms. Damico:

A proposed OAC Chapter 3745-77 Title V permit for the referenced facility has been issued for review by U.S. EPA. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. If U.S. EPA does not object to this proposed permit, the permit will be processed for issuance as a final action not less than 45 days from the date of this letter. Please contact me at (614) 644-2835 by the end of the 45 day review period if you wish to object to the proposed permit.

Sincerely,

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

Cc: Ohio EPA DAPC, Northwest District Office

# PROPOSED

# Division of Air Pollution Control
# Title V Permit
for
Richland Substation Peaker Facility

| | |
|---|---|
| Facility ID: | 0320010006 |
| Permit Number: | P0118546 |
| Permit Type: | Renewal |
| Issued: | 10/20/2015 |
| Effective: | To be entered upon final issuance |
| Expiration: | To be entered upon final issuance |

Ohio Environmental Protection Agency

**Division of Air Pollution Control**
**Title V Permit**
for
Richland Substation Peaker Facility

**Table of Contents**


Authorization ..... 1

A. Standard Terms and Conditions ..... 2

1. Federally Enforceable Standard Terms and Conditions ..... 3
2. Monitoring and Related Record Keeping and Reporting Requirements ..... 3
3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance ..... 6
4. Risk Management Plans ..... 7
5. Title IV Provisions ..... 7
6. Severability Clause ..... 7
7. General Requirements ..... 7
8. Fees ..... 8
9. Marketable Permit Programs ..... 8
10. Reasonably Anticipated Operating Scenarios ..... 9
11. Reopening for Cause ..... 9
12. Federal and State Enforceability ..... 9
13. Compliance Requirements ..... 9
14. Permit Shield ..... 11
15. Operational Flexibility ..... 11
16. Emergencies ..... 12
17. Off-Permit Changes ..... 12
18. Compliance Method Requirements ..... 12
19. Insignificant Activities or Emissions Levels ..... 13
20. Permit to Install Requirement ..... 13
21. Air Pollution Nuisance ..... 13
22. Permanent Shutdown of an Emissions Unit ..... 13
23. Title VI Provisions ..... 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only ..... 14
25. Records Retention Requirements Under State Law Only ..... 14
26. Inspections and Information Requests ..... 14
27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements ..... 15
28. Permit Transfers ..... 15

29. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations ..... 15
30. Submitting Documents Required by this Permit ..... 16
B. Facility-Wide Terms and Conditions ..... 17
C. Emissions Unit Terms and Conditions ..... 22
1. Emissions Unit Group - Peakers 1: B001, B002, B003 ..... 23
2. Emissions Unit Group - Peakers 2: P001, P002, P003 ..... 31

# Authorization

| | |
|---|---|
| Facility ID: | 0320010006 |
| Facility Description: | 437 MW Nominal Capacity Peaking Station |
| Application Number(s): | A0052841 |
| Permit Number: | P0118546 |
| Permit Description: | Renewal Title V operating permit for a 437 MW nominal capacity peaking station |
| Permit Type: | Renewal |
| Issue Date: | 10/20/2015 |
| Effective Date: | To be entered upon final issuance |
| Expiration Date: | To be entered upon final issuance |
| Superseded Permit Number: | P0116036 |

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

Richland Substation Peaker Facility
Carpenter Rd. S/U.S. 24
Defiance, OH 43512

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 Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

# A. Standard Terms and Conditions

## 1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting For State-Only Requirements

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(5) Standard Term and Condition A. 30.

*(Authority for term: ORC 3704.036(A))*

## *2.* Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))*

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordingsfor continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

*(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))*

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any submittedscheduled maintenancerequests, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the

probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be submitted promptly to the Ohio EPA DAPC, Northwest District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Ohio EPA DAPC, Northwest District Office by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally

enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))*

(4) Each written report shall be signed by a Responsible Official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))*

(5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northwest District Office unless otherwise specified.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**3. Reporting of Any Exceedence of a Federally Enforceable Emission Limitation or Control Requirement Resulting From Scheduled Maintenance**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

*(Authority for term: OAC rule 3745-77-07(A)(3)(c))*

**4. Risk Management Plans**

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

*(Authority for term: OAC rule 3745-77-07(A)(4))*

**5. Title IV Provisions**

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

*(Authority for term: OAC rule 3745-77-07(A)(5))*

**6. Severability Clause**

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

*(Authority for term: OAC rule 3745-77-07(A)(6))*

**7. General Requirements**

a) Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permitexcept as provided pursuant to A.16 below.

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

*(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

**8. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

**9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*

**10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

**11. Reopening for Cause**

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

*(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))*

**12. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

*(Authority for term: OAC rule 3745-77-07(B))*

**13. Compliance Requirements**

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible

Officialthat, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c) The permittee shall submit progress reports to the Ohio EPA DAPC, 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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Ohio EPA DAPC, Northwest District Office) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittentconsistent with A.13.d.2.a above.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d.2.a above.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

*(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))*

**14. Permit Shield**

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

*(Authority for term: OAC rule 3745-77-07(F))*

**15. Operational Flexibility**

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Ohio EPA DAPC, Northwest District Office as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*

## 16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

*(Authority for term: OAC rule 3745-77-07(G))*

## 17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

*(Authority for term: OAC rule 3745-77-07(I))*

## 18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Federal Register 8314, Feb. 24, 1997), in the context of any future proceeding.

*(This term is provided for informational purposes only.)*

**19. Insignificant Activities or Emissions Levels**

Each IEU that is subject to one or more applicable requirements shall comply with those applicable requirements.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**20. Permit to Install Requirement**

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**21. Air Pollution Nuisance**

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

*(Authority for term: OAC rule 3745-77-07(A)(1))*

**22. Permanent Shutdown of an Emissions Unit**

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the Responsible Official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the Responsible Official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

Unless otherwise exempted, noemissions unit identified in this permit that has beencertified by the Responsible Official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.

*(Authority for term: OAC rule 3745-77-01)*

**23. Title VI Provisions**

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons operating appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

*(Authority for term: OAC rule 3745-77-01(H)(11)))*

**24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only**

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to theOhio 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Ohio EPA DAPC, Northwest District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

**25. Records Retention RequirementsUnder State Law Only**

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

**26. Inspections and Information Requests**

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

*(Authority for term: OAC rule 3745-77-07(C))*

**27. Scheduled Maintenance/Malfunction Reporting For State-Only Requirements**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the Ohio EPA DAPC, Northwest District Office in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Ohio EPA DAPC, Northwest District Office must be notified in writing of any transfer of this permit.

*(Authority for term: OAC rule 3745-77-01(C))*

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potential to emit; or

c) where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

## 30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event ofan alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northwest District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.

# 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) None.

2) This facility is subject to the applicable requirements specified in OAC chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

3) All asbestos renovation and demolition activities conducted at this facility shall be performed in accordance with the applicable requirements specified in 40 CFR, Part 61, Subpart M.

4) The following emissions units contained in this permit are subject to 40 CFR, Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines: P004, P005, P006. The complete NESHAPS requirements, including the NESHAPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website http://ecfr.gpoaccess.gov or by contacting the Ohio EPA, Northwest District Office.

   These emissions units are existing emergency compression ignition (CI) reciprocating internal combustion engine(s) (RICE), installed before 06/12/06, located at an area source for hazardous air pollutants (HAPs) and are subject to the following:

| | |
|---|---|
| General Compliance Requirements | 63.6603, 63.6605. 63.6640(f) and Table 2d |
| Monitoring, Installation, Collection, Operation and Maintenance Requirements | 63.6625(e), (f), (h) and (i) |
| Reporting Requirements | 63.6640(b), 63.6650(f) |
| Record Keeping Requirements | 63.6655(e) and (f), 63.6660(a), (b), (c) and Table 6 |
| General Provisions | 63.6665 and Table 8 |
| Implementation and Enforcement | 63.6670 |

   [Authority for term: OAC rule 3745-77-07(A)(13) and 40 CFR, Part 63, Subpart ZZZZ]

5) The permittee shall ensure that any CAIR $NO_x$, $SO_2$, or $NO_x$ ozone season units complies with the requirements of OAC chapter 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, 3745-109-10 and 3745-109-16 for the affected emissions units.

   The permittee shall also comply with any subsequent federally mandated programs that may replace the CAIR program affecting electric generating facilities.

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

6) The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit to install or in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, 3745-21 and 3745-31, and/or 40 CFR Part 60 or 63:

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| B004 | 6 mmBtu/hr Natural gas Fired Pre-heater |
| P004 | 230 KW CAT Emergency Diesel Generator, Diesel Fuel [PBR06301] |
| P005 | 230 KW CAT Emergency Diesel Generator, Diesel Fuel [PBR06301] |
| P006 | 230 KW CAT Emergency Diesel Generator, Diesel Fuel [PBR06301] |

[Authority for term: OAC rule 3745-77-07(A)(13)]

7) <u>Transport Rule (TR) Trading Program Requirements</u>

a) The permittee shall comply with all applicable Cross-State Air Pollution Rule (CSAPR) requirements (40 CFR Part 97, Subparts AAAAA – DDDDD) by the compliance date specified in 40 CFR 97, Subparts AAAAA – DDDDD.

b) The TR subject units, and the unit-specific monitoring provisions at this source, are identified in the following table. These units are subject to the requirements for the TR NOX Annual Trading Program, TR NOX Ozone Season Trading Program, and TR SO2 Group 1 Trading Program.

| Unit ID: | |
|---|---|
| P001 | simple cycle turbine generator |
| P002 | simple cycle turbine generator |
| P003 | simple cycle turbine generator |

| Parameter | Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart B (for $SO_2$ monitoring) and 40 CFR part 75, subpart H (for $NO_X$ monitoring) | Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D | Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75,appendix E | Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19 | EPA-approved alternative monitoring system requirements pursuant to 40 CFR part 75, subpart E |
|---|---|---|---|---|---|
| $SO_2$ | | x | ---------- | | |
| $NO_X$ | x | ---------- | | | |
| Heat input | | x | ---------- | | |

c) The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.430 through 97.435 (TR NOX Annual Trading Program), 97.530 through 97.535 (TR NOX Ozone Season Trading Program) and 97.630 through 97.635 (TR SO2 Group 1 Trading Program), as applicable]. The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable TR trading programs.

d) Owners and operators must submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan for each unit is available at the EPA's website at http://www2.epa.gov/airmarkets/monitoring-plans.

e) Owners and operators that want to use an alternative monitoring system must submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR part 75, subpart E and 40 CFR 75.66 and 97.435 (TR NOx Annual Trading Program), 97.535 (TR NOx Ozone Season Trading Program) and 40 CFR 97.635 (TR SO2 Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative monitoring system is available on the EPA's website at http://www2.epa.gov/airmarkets/part-75-petition-responses.

f) Owners and operators that want to use an alternative to any monitoring, recordkeeping, or reporting requirement under 40 CFR 97.430 through 97.434 (TR NOX Annual Trading Program), 97.530 through 97.534 (TR NOX Ozone Season Trading Program) and 97.630 through 97.634 (TR SO2 Group 1 Trading Program) must submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 75.66 and 97.435 (TR NOX Annual Trading Program), 97.535 (TR NOX Ozone Season Trading Program) and 97.635 (TR

SO2 Group 1 Trading Program). The Administrator's response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on EPA's website at http://www2.epa.gov/airmarkets/part-75-petition-responses.

g) The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (TR NOX Annual Trading Program), 97.530 through 97.534 (TR NOX Ozone Season Trading Program)and 97.630 through 97.634 (TR SO2 Group 1 Trading Program), and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add to or change this unit's monitoring system description.

h) **TR NOx Annual Trading Program requirements**

| | |
|---|---|
| Designated representative requirements | 97.406(a), 97.413-97.418 |
| Emissions monitoring, reporting and recordkeeping requirements | 97.406(b), 97.430-97.435 |
| NOx emissions requirements | 97.406(c) |
| Title V permit revision requirements | 97.406(d) |
| Additional recordkeeping and reporting requirements | 97.406(e) |
| Liability | 97.406(f) |
| Effect on other authorities | 97.406(g) |

i) **TR NOx Ozone Season Trading Program requirements**

| | |
|---|---|
| Designated representative requirements | 97.506(a), 97.513-97.518 |
| Emissions monitoring, reporting and recordkeeping requirements | 97.506(b), 97.530-97.535 |
| NOx emissions requirements | 97.506(c) |
| Title V permit revision requirements | 97.506(d) |
| Additional recordkeeping and reporting requirements | 97.506(e) |
| Liability | 97.506(f) |
| Effect on other authorities | 97.506(g) |

j) **TR SO2 Group 1 Trading Program requirements**

| | |
|---|---|
| Designated representative requirements | 97.606(a), 97.613-97.618 |
| Emissions monitoring, reporting and recordkeeping requirements | 97.606(b), 97.630-97.635 |
| SO2 emissions requirements | 97.606(c) |
| Title V permit revision requirements | 97.606(d) |
| Additional recordkeeping and reporting requirements | 97.606(e) |
| Liability | 97.606(f) |
| Effect on other authorities | 97.606(g) |

[All of Section 7): 40 CFR Part 97]

# C. Emissions Unit Terms and Conditions

## 1. Emissions Unit Group -Peakers 1: B001, B002, B003

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| B001 | Nominal 327 mmBtu/hr natural gas/distillate oil-fired simple cycle turbine |
| B002 | Nominal 327 mmBtu/hr natural gas/distillate oil-fired simple cycle turbine |
| B003 | Nominal 327 mmBtu/hr natural gas/distillate oil-fired simple cycle turbine |

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>[PTI #03-13247 issued October 28, 2004] | <u>Emissions units B001, B002, and B003 shall each be limited to:</u><br><br>Sulfur dioxide (SO2) emissions shall not exceed 165.14 pounds per hour (lbs/hr).<br><br>Carbon monoxide (CO) emissions shall not exceed 35.97 lbs/hr.<br><br>Volatile organic compound (VOC) emissions shall not exceed 7.85 lbs/hr.<br><br>Nitrogen oxides (NOx) emissions shall not exceed 287.76 lbs/hr.<br><br>Particulate emissions (PE) shall not exceed 12.43 lbs/hr. |
| b. | OAC rule 3745-31-05(D)<br>[PTI #03-13247 issued October 28, 2004] | SO2 emissions from emissions units B001, B002 and B003, combined, shall not exceed 72.55 tons per year (tpy), based upon a rolling, 12-month summation of the monthly SO2 emissions.<br><br>CO emissions from emissions unit B001, |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | B002 and B003, combined, shall not exceed 25.09 tpy, based upon a rolling, 12-month summation of the monthly CO emissions.<br><br>VOC emissions from emissions unit B001, B002 and B003, combined, shall not exceed 5.47 tpy, based upon a rolling, 12-month summation of the monthly VOC emissions.<br><br>NOx emissions from emissions unit B001, B002 and B003, combined, shall not exceed 100.35 tpy, based upon a rolling, 12-month summation of the monthly NOx emissions.<br><br>PE from emissions unit B001, B002 and B003, combined, shall not exceed 5.46 tpy, based upon a rolling, 12-month summation of the monthly PE.<br><br>See c)(1) and c)(2). |
| c. | OAC rule 3745-17-07(A) | Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule. |
| d. | OAC rule 3745-17-11(B)(4) | PE shall not exceed 0.040 pound per million British thermal units (lb/mmBtu) of actual heat input. |
| e. | OAC rule 3745-18-26(C) | SO2 emissions shall not exceed 0.7 lb/mmBtu of actual heat input. |

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The maximum annual fuel usage restrictions for emissions units B001, B002 and B003, combined, shall not exceed 445,000,000 cubic feet of natural gas and 2,080,000 gallons of distillate oil (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil), based upon a rolling, 12-month summation of the monthly fuel usage rates.

[Authority for term: OAC rule 3745-77-07(A)(1); PTI #03-13247]

(2) The permittee shall not use a combination of the above fuel usages that exceed 100.35 tons of NOx emissions per rolling, 12-month period based on emission factors of 0.88 lb of NOx/mm Btu for distillate oil and 0.32 lb of NOx/mmBtu for natural gas.

[Authority for term: OAC rule 3745-77-07(A)(1); PTI #03-13247]

(3) The permittee shall burn only natural gas and distillate oil in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1); PTI #03-13247]

(4) The quality of distillate oil burned in this emissions unit shall have a sulfur content that is sufficient to comply with the allowable SO2 emission limitations specified in b)(1)e. above.

[Authority for term: OAC rule 3745-77-07(A)(1); PTI #03-13247]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for emissions units B001, B002, and B003, combined:

a. The total amount of natural gas and distillate oil fired, in cubic feet and gallons, respectively.

b. The rolling, 12-month summations of the natural gas and distillate oil usage rates, in cubic feet and gallons, respectively.

c. The total SO2, CO, VOC, NOx, and particulate emissions, in pounds or tons.

d. The rolling, 12-month summations of the SO2, CO, VOC, NOx, and particulate emissions, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI #03-13247]

(2) For each day during which the permittee burns a prohibited fuel (i.e., one other than natural gas or distillate oil), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI #03-13247]

(3) For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)). A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content

and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as ASTM method D240 (for heat content) and ASTM method D4294 (for sulfur content)), or equivalent methods as approved by the Director.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI #03-13247]

e) Reporting Requirements

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

a. All exceedances of the rolling, 12-month fuel usage restrictions;

b. All exceedances of the rolling, 12-month emission limitations;

c. Any deviations of the allowable SO2 emission limitation (lb/mmBtu); and

d. Each day when a prohibited fuel (i.e. one other than natural gas or distillate oil) was burned in this emissions unit.

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 (the appropriate District Office or local air agency).

[Authority for term: OAC rule 3745-77-01(C); PTI #03-13247]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following methods:

a. <u>Emission Limitations:</u>

SO2 emissions from emissions units B001, B002, and B003, combined, shall not exceed 72.55 tpy, based upon a rolling, 12-month summation of the monthly SO2 emissions.

CO emissions from emissions units B001, B002, and B003, combined, shall not exceed 25.09 tpy, based upon a rolling, 12-month summation of the monthly CO emissions.

VOC emissions from emissions units B001, B002, and B003, combined, shall not exceed 5.47 tpy, based upon a rolling, 12-month summation of the monthly VOC emissions.

NOx emissions from emissions units B001, B002, and B003, combined, shall not exceed 100.35 tpy, based upon a rolling, 12-month summation of the monthly NOx emissions.

PE from emissions units B001, B002, and B003, combined, shall not exceed 5.46 tpy, based upon a rolling, 12-month summation of the monthly PE.

Applicable Compliance Method:

Compliance with the rolling, 12-month emission limitations above shall be based upon the records required in d)(1) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI #03-13247]

b. Emission Limitation:

SO2 emissions from emissions units B001, B002, and B003, individually, shall not exceed 165.14 lbs/hr.

Applicable Compliance Method:

When firing distillate oil, compliance with the hourly SO2 emission limitation may be demonstrated by multiplying the emission factor of 1.01S lb/mmBtu (where S = the percent sulfur in the fuel) by the emissions unit's maximum rated heat input capacity (327 mmBtu/hr). When firing natural gas, compliance with the hourly SO2 emission limitation may demonstrated by multiplying the emission factor of 0.94S lb/mmBtu (where S = the percent sulfur in the fuel) by the emissions unit's maximum rated heat input capacity (327 mmBtu/hr). These emission factors are specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.1, Table 3.1-2a (04/00). If required, the permittee shall demonstrate compliance with the hourly SO2 emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 6.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI #03-13247]

c. Emission Limitation:

CO emissions from emissions units B001, B002, and B003, individually, shall not exceed 35.97 lbs/hr.

Applicable Compliance Method:

When firing distillate oil, compliance with the hourly CO emission limitation may be demonstrated by multiplying the emission factor of 0.0033 lb/mmBtu by the emissions unit's maximum rated heat input capacity (327 mmBtu/hr). When firing natural gas, compliance with the hourly CO emission limitation may demonstrated by multiplying the emission factor of 0.082 lb/mmBtu by the emissions unit's maximum rated heat input capacity (327 mmBtu/hr). These emission factors are specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.1, Table 3.1-1 (04/00). If required, the permittee shall demonstrate compliance with the hourly CO emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 10.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI #03-13247]

d. Emission Limitation:

VOC emissions from emissions units B001, B002, and B003, individually, shall not exceed 7.85 lbs/hr.

Applicable Compliance Methods:

When firing distillate oil, compliance with the hourly VOC emission limitation may be demonstrated by multiplying the emission factor of 0.00041 lb/mmBtu by the emissions unit's maximum rated heat input capacity (327 mmBtu/hr). When firing natural gas, compliance with the hourly VOC emission limitation may demonstrated by multiplying the emission factor of 0.0021 lb/mmBtu by the emissions unit's maximum rated heat input capacity (327 mmBtu/hr). These emission factors are specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.1, Table 3.1-2a (04/00). If required, the permittee shall demonstrate compliance with the hourly VOC emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 18, 25 or 25A.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI #03-13247]

e. Emission Limitation:

NOx emissions from emissions units B001, B002, and B003, individually, shall not exceed 287.76 lbs/hr.

Applicable Compliance Methods

When firing distillate oil, compliance with the hourly NOx emission limitation may be demonstrated by multiplying the emission factor of 0.88 lb/mmBtu by the emissions unit's maximum rated heat input capacity (327 mmBtu/hr). When firing natural gas, compliance with the hourly NOx emission limitation may demonstrated by multiplying the emission factor of 0.32 lb/mmBtu by the emissions unit's maximum rated heat input capacity (327 mmBtu/hr).

These emission factors are specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.1, Table 3.1-1 (04/00). If required, the permittee shall demonstrate compliance with the hourly NOx emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 7.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI #03-13247]

f. Emission Limitation:

PE from emissions units B001, B002, and B003, individually, shall not exceed 12.43 lbs/hr.

Applicable Compliance Method:

When firing distillate oil, compliance with the hourly PE limitation may be demonstrated by multiplying the emission factor of 0.0043 lb/mmBtu by the emissions unit's maximum rated heat input capacity (327 mmBtu/hr). When firing natural gas, compliance with the hourly PE limitation may demonstrated by multiplying the emission factor of 0.0019 lb/mmBtu by the emissions unit's maximum rated heat input capacity (327 mmBtu/hr). These emission factors are specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.1, Table 3.1-2a (04/00). If required, the permittee shall demonstrate compliance with the hourly PE limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI #03-13247]

g. Emission Limitation:

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

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

No visible emission observations are specifically required to demonstrate compliance with these emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for term: OAC rule 3745-77-07(C)(1); OAC rule 3745-17-07(A); PTI #03-13247]

h. Emission Limitation:

PE shall not exceed 0.040 lb/mmBtu of actual heat input

Applicable Compliance Method:

When firing distillate oil, compliance with this emission limitation may be based upon an emission factor of 0.0043 lb/mmBtu. When firing natural gas, compliance with this emission limitation may be based upon an emission factor of 0.0019 lb/mmBtu. These emission factors are specified in U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.1, Table 3.1-2a (4/00).

[Authority for term: OAC rule 3745-77-07(C)(1); OAC rule 3745-17-11(B); PTI #03-13247]

i. Emission Limitation:

SO2 emissions shall not exceed 0.7 lb/mmBtu of actual heat input

Applicable Compliance Method:

When firing distillate oil, compliance with this emission limitation may be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall demonstrate with this emission limitation through emission test performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 6, while firing distillate oil.

[Authority for term: OAC rule 3745-77-07(C)(1); OAC rule 3745-18-26(C); PTI #03-13247]

g) Miscellaneous Requirements

(1) None.

## 2. Emissions Unit Group -Peakers 2: P001, P002, P003

| EU ID | Operations, Property and/or Equipment Description |
|---|---|
| P001 | Nominal 1,673 mmBtu/hr natural gas-fired simple cycle turbine generator, with distillate oil backup, controlled with water injection NOx reduction system |
| P002 | Nominal 1,673 mmBtu/hr natural gas-fired simple cycle turbine generator, with distillate oil backup, controlled with water injection NOx reduction system |
| P003 | Nominal 1,673 mmBtu/hr natural gas-fired simple cycle turbine generator, with distillate oil backup, controlled with water injection NOx reduction system |

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) d)(8) through d)(11) and e)(1)h.

b) Applicable Emissions Limitations and/or Control Requirements

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

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3)<br>(PTI #03-13247, issued October 28, 2004) | Compliance with this rule also includes compliance with OAC rules 3745-17-07(A); 3745-17-11(B)(4); 3745-18-06(F); 3745-21-08(B); 3745-31-05(D); 40 CFR, Part 60, Subpart GG and 40 CFR, Part 75.<br><br>[See b)(2)e.]<br><br><u>Emissions units P001, P002, and P003 shall each be limited to:</u><br><br>Particulate emissions (PE) shall not exceed 38.0 pounds per hour (lbs/hr). [See b)(2)i.]<br><br>Nitrogen oxides (NOx) emissions shall not exceed 251.4 lbs/hr, excluding startup/shutdown periods.<br><br>During startup/shutdown periods, NOx emissions shall not exceed 300 lbs/hr. [See b)(2)g.] |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | NOx emissions shall not exceed 25 ppmvd at 15% oxygen, as a 4-hour average, when firing natural gas, excluding startup/shutdown periods.<br><br>NOx emissions shall not exceed 42 ppmvd NOx at 15% oxygen as a 4-hour average when firing distillate oil, excluding startup/shutdown periods.<br><br>Sulfur dioxide (SO2) emission shall not exceed 71.0 lbs/hr.<br><br>Carbon monoxide (CO) emissions shall not exceed 40.0 lbs/hr, excluding startup/shutdown periods.<br><br>During startup/shutdown periods CO emissions shall not exceed 281 lbs/hr.<br><br>Volatile organic compound (VOC) emissions shall not exceed 18.4 lbs/hr.<br><br>Formaldehyde emissions shall not exceed 3.9 lbs/hr.<br><br>Visible PE from any stack shall not exceed 10% opacity as a 6-minute average when firing natural gas. |
| b. | OAC rule 3745-31-05(D)<br>(PTI #03-13247, issued October 28, 2004) | SO2 emissions from emissions units P001, P002 and P003, combined, shall not exceed 65.3 tons per year (tpy), as a rolling, 12-month summation of the monthly SO2 emissions.<br><br>CO emissions from emissions units P001, P002 and P003, combined, shall not exceed 195.4 tpy, as a rolling, 12-month summation of the monthly CO emissions.<br><br>VOC emissions from emissions units P001, P002 and P003, combined, shall not exceed 16.9 tpy, as a rolling, 12-month summation of the monthly VOC emissions. |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| | | NOx emissions from emissions units P001, P002 and P003, combined, shall not exceed 238.7 tpy, as a rolling, 365-day summation of the daily NOx emissions.<br><br>Formaldehyde emissions from emissions units P001, P002 and P003, combined, shall not exceed 3.6 tpy, as a rolling, 12-month summation of the monthly formaldehyde emissions.<br><br>PE from emissions units P001, P002 and P003, combined, shall not exceed 35.0 tpy, as a rolling, 12-month summation of the monthly PE.<br><br>[See c)(1) and c)(2)] |
| c. | OAC rule 3745-18-06(F) | See b)(2)h. |
| d. | OAC rule 3745-17-11(B)(4) | See b)(2)h. |
| e. | OAC rule 3745-17-07(A) | Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average when firing distillate oil, except as provided by rule. |
| f. | 40 CFR, Part 60, Subpart GG [40 CFR 60.330-335] | See b)(2)a through b)(2)d., b)(2)h. & e)(1)g. |
| g. | 40 CFR, Part 75 | See d)(5). |
| h. | OAC rule 3745-109 | See Section B, paragraphs 5) and 7). |

(2) Additional Terms and Conditions

a. In lieu of monitoring the nitrogen content of the natural gas being fired in the turbine as required by 40 CFR, Part 60.334(b), the permittee shall install, operate, and maintain systems to continuously monitor and record emissions of NOx from this emissions unit in accordance with the requirements specified in this permit.

b. In lieu of the requirements of 40 CFR, Part 60.334(a) to install and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in each turbine, the permittee shall install, operate, and maintain systems to continuously monitor and record emissions of NOx from this emissions unit in accordance with the requirements specified in this permit.

c. In lieu of the excess emissions reports required under 40 CFR, Part 60.334, the permittee shall submit excess emissions reports for this emissions unit in accordance with the requirements specified in this permit.

d. In lieu of the test methods and procedures required under 40 CFR, Part 60.335, the permittee shall follow the testing and continuous emissions monitoring requirements for this emissions unit in accordance with the requirements specified in this permit.

e. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of clean burning fuels, the use of water injection, fuel usage restrictions and compliance with the specified emission limitations and applicable rules identified above.

f. The hourly PE, SO2, CO, VOC, and formaldehyde emission limitations reflect the hourly potential emissions for this emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping, and/or reporting requirements to ensure compliance with these emission limitations.

g. Startup periods shall not exceed 45 minutes in duration and shutdown periods shall not exceed 45 minutes in duration. If a more accurate NOx emission rate for startup/shutdown periods is established based upon the continuous monitoring system data it may be used instead of the emission rate specified above [see b)(1)] with prior approval from the Ohio EPA.

h. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

i. Total PM10 emissions were evaluated and did not trigger any additional federal requirements. Therefore, the total PM10 emissions are being regulated as PE.

c) Operational Restrictions

(1) The maximum annual fuel usage for emissions units P001, P002, and P003 combined, shall not exceed any of the following:

a. 5,579.72 million cubic feet of natural gas per rolling, 12-month period;
b. 19.08 million gallons of distillate oil per rolling, 12-month period; and
c. 5,579.72 million cubic feet of cumulative fuel usage per rolling, 12-month period;

where:

1.0 million cubic feet of natural gas = 1.0 million cubic feet of cumulative fuel usage
1.0 million gallons of distillate oil = 292.44 million cubic feet of cumulative fuel usage

These emissions units have been in operation for greater than 12 months and, as such, records exist to demonstrate compliance with the rolling, 12-month fuel usage restrictions upon issuance of this permit.

[Authority for term: OAC rule 3745-77-07(A)(1); PTI #03-13247]

(2) The sulfur content of the distillate oil (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) used in this emissions unit shall not exceed 0.05%, by weight. (This limit is at the threshold limit for acid rain monitoring requirements and is more stringent than the sulfur limit required by 40 CFR, Part 60, Subpart GG.)

[Authority for term: OAC rule 3745-77-07(A)(1); PTI #03-13247]

(3) The permittee shall fire only natural gas or distillate oil in this emissions unit.

[Authority for term: OAC rule 3745-77-07(A)(1); PTI #03-13247]

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 quantity of natural gas fired, in million cubic feet;

b. the quantity of distillate oil fired, in million gallons;

c. the cumulative fuel usage [as described in c)(1)], in million cubic feet;

d. the rolling, 12-month summations of the natural gas, distillate oil, and cumulative fuel usage;

e. the total SO2, VOC, formaldehyde, PE, and CO (including CO emissions from any startup or shutdown of the emissions units) emissions, in pounds or tons; and

f. the rolling, 12-month summations of the SO2, VOC, formaldehyde, PE, and CO emissions, in tons.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI #03-13247]

(2) The permittee shall maintain daily records of the following information for emissions units P001, P002, and P003, combined:

a. the total NOx emissions, in pounds or tons, using the data from the nitrogen oxides continuous monitoring systems, including startup/shutdown periods;

b. the rolling, 365-day summation of the NOx emissions, in tons;

c. for each day during which the permittee burns a prohibited fuel (i.e., one other than natural gas or distillate oil), the permittee shall maintain a record of the type and quantity of fuel burned in these emissions units; and

d. the duration of each startup and shutdown period.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI #03-13247]

(3) The permittee shall monitor and record the sulfur content of the natural gas being burned in this emissions unit or make the demonstration that the sulfur content of the natural gas does not need to be monitored and recorded in accordance with the provisions specified in 40 CFR, Part 60.334(h). Owners, operators or fuel vendors may develop custom fuel schedules for the determination of the sulfur content based on the design and operation of the affected facility and the characteristics of the fuel supply. Except as provided in 40 CFR, Parts 60.334(i)(3)(i) and 60.334(i)(3)(ii), these custom schedules shall be substantiated with data and must be approved by the Ohio EPA, Central Office before they can be used.

Analyses for the purpose of determining the sulfur content of the natural gas may be performed by the permittee, the fuel vendor, or any other qualified agency in accordance with the analytical methods specified in 40 CFR, Part 60, Subpart GG, Section 60.335(d) or equivalent methods as approved by the Administrator.

[Authority for term: OAC rule 3745-77-07(C)(1); 40 CFR Part 60 Subpart GG; PTI #03-13247]

(4) The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below.

Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F)).

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR, Part 60, Appendix A, Method 19,

or the appropriate ASTM methods (such as ASTM method D240 (for heat content) and ASTM method D4294 (for sulfur content)), or equivalent methods as approved by the Director.

[Authority for term: OAC rule 3745-77-07(C)(1); 40 CFR Part 60 Subpart GG; PTI #03-13247]

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

Each continuous monitoring system consists of all the equipment used to acquire data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

The permittee shall maintain on-site documentation from the U.S. EPA or the Ohio EPA that the continuous NOx monitoring system has been certified in accordance with the applicable requirements specified in 40 CFR, Part 60 and Part 75. The letter of certification shall be made available to the Director upon request.

The permittee shall maintain records of the following data obtained by the continuous NOx monitoring system: emissions of NOx in ppmvd at 15% oxygen on an hourly average basis, NOx in ppmvd at 15% oxygen as a 4-hr average, lbs/hr, results of daily zero/span calibration checks, results of quarterly cylinder gas audits, linearity checks or relative accuracy test audits and magnitude of manual calibration adjustments.

The permittee shall develop a written quality assurance/quality control plan for the continuous NOx monitoring system designed to ensure continuous valid and representative readings of NOx emissions in units of the applicable standard(s). The plan shall follow the applicable requirements of 40 CFR, Part 60, Appendix F and 40 CFR, Part 75, Appendix B. The quality assurance/quality control plan and a logbook documenting the activities related to the continuous NOx monitoring system must be kept on site and available for inspection during regular office hours.

The permittee may conduct the relative accuracy test audits for the continuous NOx monitoring system in accordance with the frequencies required for monitoring systems subject to 40 CFR, Part 75, Appendix B; however, the permittee is still required to provide the audit results in units of the applicable standard(s), in accordance with 40 CFR, Part 60. In addition, linearity checks conducted pursuant to 40 CFR, Part 75, Appendix B, may be used in place of quarterly cylinder gas audits, as required in 40 CFR, Part 60.

If the NOx monitoring and/or recording equipment is not in service when the emissions unit is in operation, the permittee shall comply with the appropriate missing data procedures specified in 40 CFR, Part 75.

[Authority for term: OAC rule 3745-77-07(C)(1); 40 CFR Part 75; PTI #03-13247]

(6) The permittee shall operate and maintain equipment to continuously monitor and record the percent oxygen in the stack serving this emissions unit when the emissions unit is in operation. The monitoring and recording equipment shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

[Authority for term: OAC rule 3745-77-07(C)(1); 40 CFR, Part 75; PTI #03-13247]

(7) The permittee shall operate and maintain equipment to continuously monitor and record the actual 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 not in service when the emissions unit is in operation, the permittee shall comply with the appropriate missing data procedures specified in 40 CFR, Part 75.

[Authority for term: OAC rule 3745-77-07(C)(1); 40 CFR, Part 75; PTI #03-13247]

(8) The PTI application for these emissions unit(s), [P001, P002 and P003], was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):

i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or

ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.

b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).

c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "**X**" hours per day and "**Y**" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

TLV/10 x 8/X x 5/Y = 4 TLV/XY = MAGLC

d. The following summarizes the results of dispersion modeling for the significant toxic contaminants (emitted at 1 or more tons/year) or "worst case" toxic contaminant(s):

Toxic Contaminant: formaldehyde

TLV (mg/m3): 272.69

Maximum Hourly Emission Rate (lbs/hr): 11.7

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3.00

MAGLC (ug/m3): 6.49

The permittee, has demonstrated that emissions of formaldehyde, from emissions unit(s) P001, P002 and P003, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F).

[Authority for term: ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70, PTI #03-13247]

(9) Prior to making any physical changes or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, 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 new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Toxic Air Contaminant Statute" 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 solely due to a non-restrictive change to a parameter or process operation, where compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a "modification", the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70, PTI #03-13247]

(10) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):

a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);

b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);

c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and

d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70, PTI #03-13247]

(11) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[Authority for term: ORC 3704.03(F)(3)(c) and F(4), OAC rule 3745-114-01, Option A, Engineering Guide #70, PTI #03-13247]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify all exceedances of the following:

a. the rolling, 12-month natural gas, distillate oil, and cumulative fuel usage limitations;

b. the rolling, 12-month SO2, VOC, formaldehyde, PE, and CO emission limitations;

c. the rolling, 365-day NOx emission limitation;

d. the distillate oil sulfur content restriction;

e. the startup and shutdown period duration limitation;

f. each day when a prohibited fuel (i.e., one other than natural gas or distillate oil) was fired in emissions units P001, P002 or P003;

g. each period during which an exemption for ice-fog provided in 40 CFR, Part 60.332(g) 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; and

h. any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration; or if no changes to the emissions, emissions unit(s), or the exhaust stack have been made, a statement to this effect;

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, 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 (the appropriate District Office or local air agency).

[Authority for term: OAC rule 3745-77-07(C)(1); 40 CFR, Part 60, Subpart GG; PTI #03-13247]

(2) The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Northwest District Office documenting the date, commencement and completion time, 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.

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Northwest District Office documenting any continuous NOx monitoring system downtime while the emissions unit was on line (date, time, duration, and reason) along with any corrective action(s) taken.

The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

If there are no excess NOx 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 malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

[Authority for term: OAC rule 3745-77-07(C)(1); 40 CFR, Part 75; PTI #03-13247]

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) of the terms and conditions of this permit shall be determined in accordance with the following:

a. <u>Emission Limitations:</u>

NOx emissions shall not exceed 25 ppmvd at 15% oxygen as a 4-hr average when firing natural gas, excluding startup/shutdown periods.

NOx emissions shall not exceed 42 ppmvd NOx at 15% oxygen as a 4-hr average when firing distillate oil, excluding startup/shutdown periods.

NOx emissions shall not exceed 251.4 lbs/hr, excluding startup/shutdown periods.

During startup/shutdown periods, NOx emissions shall not exceed 300 lbs/hr.

<u>Applicable Compliance Methods:</u>

Compliance with the hourly and ppmvd NOx emission limitations shall be demonstrated based upon the data generated by the continuous NOx emissions monitoring system specified in d)(5).

If required, the permittee shall demonstrate compliance with the hourly (except for the startup/shutdown emission limitation) and ppmvd NOx emission limitations through emission tests performed in accordance with f)(2).

[Authority for term: OAC rule 3745-77-07(C)(1); PTI #03-13247]

b. <u>Emission Limitations:</u>

PE from emissions units P001, P002 and P003, individually, shall not exceed 38.0 lbs/hr.

SO2 emissions from emissions units P001, P002 and P003, individually, shall not exceed 71.0 lbs/hr.

CO emissions from emissions units P001, P002 and P003, individually, shall not exceed 40.0 lbs/hr, excluding startup/shutdown periods.

During startup/shutdown periods CO emissions from emissions units P001, P002 and P003, individually, shall not exceed 281 lbs/hr.

VOC emissions from emissions units P001, P002 and P003, individually, shall not exceed 18.4 lbs/hr.

Formaldehyde emissions from emissions units P001, P002 and P003, individually, shall not exceed 3.9 lbs/hr.

Applicable Compliance Method:

The hourly PE, SO2, CO, VOC, and formaldehyde emission limitations reflect the hourly potential emissions for this emissions unit. The hourly PE, SO2, CO, VOC, and formaldehyde emission limitations were established using the emissions unit's maximum rated heat input capacity and emission factors provided by the permittee and/or the manufacturer of the emissions unit.

If required, the permittee shall demonstrate compliance with the hourly (except for the CO startup/shutdown emission limitation) emission limitations through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and for PE, Method 5; for SO2, Method 6; for VOC, Method 18, 25 or 25A and for CO, Method 10.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI #03-13247]

c. Emission Limitations:

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

Visible particulate emissions from any stack shall not exceed 20% opacity, as a 6-minute average when firing distillate oil, except as specified by rule.

Applicable Compliance Methods:

When firing natural gas, compliance with the visible particulate emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR, Part 60, Appendix A, Method 9.

When firing distillate oil, compliance with the visible particulate emission limitation shall be determined through visible emissions observations performed in accordance with 40 CFR, Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

No visible emission observations are specifically required to demonstrate compliance with these emission limitations but, if appropriate, may be required pursuant to OAC rule 3745-15-04(A).

[Authority for term: OAC rule 3745-77-07(C)(1); OAC rule 3745-17-03(B)(1); PTI #03-13247]

d. Emission Limitations:

SO2 emissions from emissions units P001, P002, and P003, combined, shall not exceed 65.3 tpy, as a rolling, 12-month summation of the monthly SO2 emissions.

CO emissions from emissions units P001, P002, and P003, combined, shall not exceed 195.4 tpy, as a rolling, 12-month summation of the monthly CO emissions.

VOC emissions from emissions units P001, P002, and P003, combined, shall not exceed 16.9 tpy, as a rolling, 12-month summation of the monthly VOC emissions.

NOx emissions from emissions units P001, P002, and P003, combined, shall not exceed 238.7 tpy, as a rolling, 365-day summation of the daily NOx emissions.

Formaldehyde emissions from emissions units P001, P002, and P003, combined, shall not exceed 3.6 tpy, as a rolling, 12-month summation of the monthly formaldehyde emissions.

PE from emissions units P001, P002, and P003, combined, shall not exceed 35.0 tpy, as a rolling, 12-month summation of the monthly PE emissions.

Applicable Compliance Method:

Compliance with the above emission limitations shall be determined based upon the records required in d)(1) and d)(2) of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1); PTI #03-13247]

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

a. The emission test shall be conducted within 6 months prior to permit renewal.

b. The emission testing shall be conducted to demonstrate compliance with the NOx hourly and ppmvd steady-state emission limitations.

c. The following test method(s) shall be employed to demonstrate compliance with the NOx emission limitations: Methods 1 through 4 and 7 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

In lieu of three, one-hour test runs, the emissions testing requirement may be satisfied using Reference Method test data collected during a CEMS Relative Accuracy Test Audit (RATA) conducted in accordance with 40 CFR, Part 75, Appendix A. The average of the Reference Method data from three consecutive RATA test runs, each of at least 60 minutes, shall be considered three, one-hour test runs for the purpose of the emissions test and RATA test requirements. A minimum of an additional six, 21-minute test runs must be used to satisfy the RATA test requirements.

d. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office. Testing is required for only one of the three emissions units (P001, P002 and P003) since each emissions unit has an identical design capacity. The emissions test results for the selected emissions unit shall be considered representative of the emissions from two remaining emissions units which do not undergo emissions testing.

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

Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, Northwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, Northwest District Office.

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

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

[Authority for term: OAC rule 3745-77-07(C)(1); 40 CFR, Part 60, Subpart GG; PTI #03-13247]

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

[Authority for term: OAC rule 3745-77-07(C)(1)]