Ohio Environmental Protection Agency

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

1/11/2016

Certified Mail

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

Randy Meyer
OMEGA JV2 Bowling Green Peaking Station
1111 Schrock Rd., Suite 100
Columbus, OH 43229

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0387020374
Permit Number: P0120160
Permit Type: Administrative Modification
County: Wood

Dear Permit Holder:

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

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

**How to appeal this permit**

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

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

**How to save money, reduce pollution and reduce energy consumption**

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

**How to give us feedback on your permitting experience**

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

**How to get an electronic copy of your permit**

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

If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

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

Cc: U.S. EPA
Ohio EPA-NWDO; Michigan; Indiana; Canada

# FINAL

# Division of Air Pollution Control
# Permit-to-Install
for
OMEGA JV2 Bowling Green Peaking Station

| | |
|---|---|
| Facility ID: | 0387020374 |
| Permit Number: | P0120160 |
| Permit Type: | Administrative Modification |
| Issued: | 1/11/2016 |
| Effective: | 1/11/2016 |

Ohio Environmental Protection Agency

**Division of Air Pollution Control**
**Permit-to-Install**
for
OMEGA JV2 Bowling Green Peaking Station

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# Authorization

| | |
|---|---|
| Facility ID: | 0387020374 |
| Facility Description: | Peaking station |
| Application Number(s): | M0003764 |
| Permit Number: | P0120160 |
| Permit Description: | Administrative modification to remove the requirement to employ a continuous emissions monitor for carbon monoxide |
| Permit Type: | Administrative Modification |
| Permit Fee: | $150.00 |
| Issue Date: | 1/11/2016 |
| Effective Date: | 1/11/2016 |

This document constitutes issuance to:

OMEGA JV2 Bowling Green Peaking Station
811 East Poe Road
Bowling Green, OH 43402

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler
Director

# Authorization (continued)

Permit Number: P0120160
Permit Description: Administrative modification to remove the requirement to employ a continuous emissions monitor for carbon monoxide

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

| | |
|---|---|
| **Emissions Unit ID:** | **P001** |
| Company Equipment ID: | Bowling Green GT No.1 |
| Superseded Permit Number: | P0119752 |
| General Permit Category and Type: | Not Applicable |

# A. Standard Terms and Conditions

## 1. Federally Enforceable Standard Terms and Conditions

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

(1) Standard Term and Condition A.2.a), Severability Clause

(2) Standard Term and Condition A.3.c) through A. 3.e)General Requirements

(3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A.9., Reporting Requirements

(5) Standard Term and Condition A.10., Applicability

(6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A.14., Public Disclosure

(8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A.16., Fees

(10) Standard Term and Condition A.17., Permit Transfers

## 2. Severability Clause

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

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## 3. General Requirements

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

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

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

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

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

**4. Monitoring and Related Record Keeping and Reporting Requirements**

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

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

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

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

(4) The analytical techniques or methods used.

(5) The results of such analyses.

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

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

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

(2) Quarterly written reports of (i) any deviations from federally enforceable emissionlimitations, operationalrestrictions, andcontroldeviceoperatingparameterlimitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Ohio EPA DAPC, Northwest District Office. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, andreportingrequirements contained in this permit shall be submitted to the Ohio EPA DAPC, Northwest District Office every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

**5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to theOhio EPA DAPC, Northwest District Officein accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

**6. Compliance Requirements**

a) All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a Responsible Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

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

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

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

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

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

c) The permittee shall submit progress reports to the Ohio EPA DAPC, Northwest District Office concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

## 7. Best Available Technology

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

**8. Air Pollution Nuisance**

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

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Ohio EPA DAPC, Northwest District Office.

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

**10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s)not exempt from the requirement to obtain a Permit-to-Install.

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

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

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

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

**12. Permit-To-Operate Application**

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

**13. Construction Compliance Certification**

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

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

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

**14. Public Disclosure**

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

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

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

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

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

**18. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

**19. Title IV Provisions**

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

# 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.

# C. Emissions Unit Terms and Conditions

**1. P001, Bowling Green GT No.1**

**Operations, Property and/or Equipment Description:**

422.57 mmBtu/hour natural gas-fired 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 operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the the table.

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| a. | OAC rule 3745-31-05(A)(3) | 3.0 lbs particulate emissions (PE)/hr, 13.14 tons PE/yr<br><br>0.12 lb sulfur dioxide (SO2)/hr, 0.53 tons SO2/yr<br><br>263.8 lbs carbon monoxide (CO)/hr,<br><br>75.7 lbs volatile organic compounds (VOC)/hr<br><br>71.2 lbs nitrogen oxides (NOx)/hr<br><br>See b)(2)a., b)(2)b., c)(2), c)(3) and c)(4).<br><br>The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-31-05(D), and 40 CFR, Part 60 Subpart GG. |
| b. | OAC rule 3745-31-05(D) | 98.0 tons CO, as a rolling, 12-month summation<br><br>30.0 tons VOC, as a rolling, 12-month summation<br><br>65.0 tons NOx, as a rolling, 12-month summation<br>See c)(1). |

| | Applicable Rules/Requirements | Applicable Emissions Limitations/Control Measures |
|---|---|---|
| c. | OAC rule 3745-18-06(F) | See b)(2)c. |
| d. | OAC rule 3745-17-11(B)(4) | See b)(2)c. |
| e. | OAC rule 3745-17-07(A) | Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule. |
| f. | 40 CFR, Part 60 Subpart GG | See b)(2)c. |

(2) Additional Terms and Conditions

a. The 3.0 lbs PE/hr, 13.14 tons PE/yr, 0.12 lb SO2/hr and 0.53 tons SO2/yr, allowable emissions rates are established to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.

b. Best available technology (BAT) for this emissions unit shall be the use of natural gas and water injection.

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

c) Operational Restrictions

(1) The maximum number of the annual operating hours for this emissions unit shall not exceed 2,250 hours, based upon a rolling, 12-month summation of the monthly numbers of operating hours.

*This permit is an administrative modification of the original Permit to Install (PTI) (PTI# 03-3161, issued 08/18/1999). As such, emissions unit has been in operation for greater than 12 months, and therefore has the necessary records to demonstrate compliance with this restriction upon issuance of this permit.

(2) The permittee shall operate and maintain a water injection system for the control of NOx emissions from this emissions unit.

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

(4) The sulfur content of the natural gas 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).

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for this emissions unit:

a. The number of hours of operation.

b. The rolling, 12-month summation of the number of hours of operation.

c. The quantity of natural gas fired, in million cubic feet.

d. The emission rates for NOx, CO and VOC, in tons, calculated as follows:

i. for VOC: the permittee shall calculate VOC emissions in a manner consistent with the manufacturers emissions model run for this pollutant;

ii. for NOx: sum the hourly NOx emission rates, lbs/hr, from the NOx continuous monitoring system as specified in d)(5)., for the calendar month, and then divide by 2000; and

iii. for CO: sum the hourly CO emission rates, lbs/hr, from the CO continuous monitoring system as specified in d)(4)., for the calendar month, and then divide by 2000.

e. The rolling, 12-month emission rates for NOx, CO and VOC, in tons.

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

(3) The permittee shall determine and record the sulfur content of the natural gas being fired in this emission unit on a quarterly basis in accordance with the permittee's approved custom schedule.

The permittee shall determine compliance with the sulfur content standard as follows: ASTM D 1072-80, D 3031-81, D 4084-82, or D 3246-81 shall be used for the sulfur content of gaseous fuels. The permittee shall determine the heat content of the fuels using ASTM method D240. The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Ohio EPA, Central Office. The newest or most recent revisions to the applicable test method shall be used for these analyses. Alternative, equivalent methods may be used if they comply with the requirements specified in 40 CFR, Part 60.13, or upon written approval by the Ohio EPA, Central Office. The frequency of the sampling shall be such that it complies with the requirements specified in 40 CFR, Part 60.334. A custom fuel monitoring schedule may be used if approved by the Ohio EPA, Northwest District Office.

(4) The permittee shall perform the following monitoring and record keeping requirements for the continuous CO monitoring system:

a. The permittee shall operate and maintain equipment to continuously monitor and record CO emissions from this emissions unit in the units specified in this permit. This shall either be in the form of a continuous emissions monitor (CEM), or the permittee may employ site specific emission factors in conjunction with continuously monitoring the fuel flow as required by condition d)(10). Such

continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13, where applicable.

b. The permittee shall maintain records of all data obtained by the continuous CO monitoring system including, but not limited to, emissions of CO in units established in this permit in the appropriate averaging period (i.e., lbs/hr for each hour and/or each rolling, 3-hour period), and if a CEMs is employed, parts per million CO on an instantaneous (one minute) basis, results of daily zero/span calibration checks, and the magnitude of manual calibration adjustments.

c. The permittee shall maintain a written quality assurance/quality control plan for the continuous CO monitoring system designed to ensure continuous valid and representative readings of CO. If a CEMs is employed, the plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous CO monitoring system must be kept on site and available for inspection during regular office hours.

d. If applicable, a statement of certification of the existing continuous CO monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 4. Proof of certification shall be made available to the Director (the Ohio EPA, Northwest District Office) upon request.

(5) The permittee shall perform the following monitoring and record keeping requirements for the continuous NOx monitoring system:

a. The permittee shall operate and maintain equipment to continuously monitor and record NOx emissions from this emissions unit in the units specified in this permit. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Parts 60 and Part 75, where applicable, or use a continuous monitoring system that is consistent with the Low Mass Emitter (LME) requirements of 40 CFR 75.19.

b. The permittee shall maintain records of all data obtained by the continuous NOx monitoring system including, but not limited to, emissions of NOx in units established in this permit in the appropriate averaging period (i.e., lbs/hr for each hour and/or each rolling, 3-hour period), and if a CEMs is employed, parts per million NOx on an instantaneous (one-minute) basis, results of daily zero/span calibration checks, and the magnitude of manual calibration adjustments.

c. The permittee shall maintain a written quality assurance/quality control plan for the continuous NOx monitoring system designed to ensure continuous valid and representative readings of NOx. If a CEMs is employed, the plan shall follow the requirements of 40 CFR Part 60, Appendix F, as appropriate. The quality assurance/quality control plan and a logbook dedicated to the continuous NOx monitoring system must be kept on site and available for inspection during regular office hours.

d. If applicable, a statement of certification of the existing continuous NOx monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2 and/or 40 CFR Part 75. Proof of certification shall be made available to the Director (the Ohio EPA, Northwest District Office) upon request.

(6) If applicable, the permittee shall perform the following monitoring and record keeping requirements for the continuous Oxygen (O2) monitor:

a. The permittee shall operate and maintain existing equipment to continuously monitor and record O2 from this emissions unit in units of percent O2. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13 and/or 40 CFR Part 75.

The permittee shall maintain records of all data obtained by the continuous O2 monitoring system including, but not limited to percent O2 on an instantaneous (one-minute) basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

b. A statement of certification of the existing continuous O2 monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 3 and/or 40 CFR Part 75. Proof of certification shall be made available to the Director (the Ohio EPA, Northwest District Office) upon request.

c. The permittee shall maintain a written quality assurance/quality control plan for the continuous O2 monitoring system designed to ensure continuous valid and representative readings of O2 emissions.

The plan shall follow the requirements of 40 CFR Part 60, Appendix F and/or 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous O2 monitoring system must be kept on site and available for inspection during regular office hours.

(7) The permittee shall keep a log of all periods of time during which the control system (water injection) was not operating, while the emissions unit was in operation, and ice fog was formed and deemed a traffic hazard by the permittee.

(8) In lieu of monitoring the nitrogen content of the natural gas being fired in the turbine and the ratio of water to fuel being fired as required by 40 CFR 60, Subpart GG [section 60.334(b) and section 60.334(a), respectively], the permittee shall install and operate systems to continuously monitor and record emissions of NOx from this emissions unit in accordance with this permit.

(9) In lieu of submitting excess emissions reports required per 40 CFR, Part 60.334, the permittee shall submit excess emissions reports for this emissions unit in accordance with this permit.

(10) The information management system for this emission unit shall be capable of monitoring and recording the fuel flow in million cu. ft. and hours of operation.

e) Reporting Requirements

(1) The permittee shall submit quarterly summaries that include a log of all periods of time during which the control system (water injection) was not operating, while the emissions unit was in operation, and ice fog was formed and deemed a traffic hazard by the permittee. 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. These reports shall be postmarked by April 30, July 30, October 30 and January 30 and shall cover the previous calendar quarters.

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

a. all exceedances of the rolling, 12-month hourly operating restriction of 2,250,

b. all exceedances of the rolling, 12-month CO limitation of 98 tons,

c. all exceedances of the rolling, 12-month VOC limitation of 30 tons, and

d. all exceedances of the rolling, 12-month NOx limitation of 65 tons.

The permittee shall submit the quarterly deviation reports to the Director (the Ohio EPA, Northwest District Office) in accordance with the Standard Terms and Conditions of this permit.

(3) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

(4) The permittee shall submit quarterly deviation (excursion) reports that identify all instances when the sulfur content of the natural gas used in this emissions unit exceeded 0.05%, by weight.

The permittee shall submit the quarterly deviation reports to the Director (the Ohio EPA, Northwest District Office) in accordance with the Standard Terms and Conditions of this permit.

(5) Data Reporting - Continuous CO Emissions Monitoring (if applicable)

a. 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 times, duration, magnitude, reason (if known), and corrective actions taken (if any) of all instances of CO values in

excess of the hourly emission limitation of 263.8 lbs CO/hr, based upon the rolling, 3-hour average emission rates. These reports shall also contain the total CO emissions for the calendar quarter (in tons).

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

c. If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

(6) Data Reporting - Continuous NOx Emissions Monitoring (if applicable)

a. 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 times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of NOx values in excess of the hourly emission limitation of 75.7 lbs NO/hr, based upon the rolling, 3-hour average emission rates. These reports shall also contain the total NOx emissions for the calendar quarter (in tons).

b. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, 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.

c. If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or

monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report.

These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

(7) Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Northwest District Office documenting all instances of continuous O2 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 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 be included in the quarterly report. These quarterly 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.

f) Testing Requirements

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

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

3.0 lbs PE/hr& 13.14 tons PE/yr

<u>Applicable Compliance Method:</u>

The hourly allowable PE limitation was established by multiplying a manufacturer-supplied emission factor of 0.007 lb PE/mmBtu by a maximum heat input rate of 422.57 mmBtu/hr.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-5, 40 CFR 60, Appendix A.

Compliance with the annual PE limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was determined by multiplying the hourly limitation by 8760 hrs/yr, and then dividing by 2000 lbs/ton).

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

0.12 lb SO2/hr& 0.53 tons SO2/yr

Applicable Compliance Method:

The hourly allowable SO2 emission limitation represents the emission unit's potential to emit based on the maximum heat input rate of 422.57, and a maximum sulfur content of 0.05%. Therefore, as long as the permittee is in compliance with the natural gas maximum sulfur content of 0.05%, compliance with the hourly SO2 emission limitation shall be assumed.

If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A.

Compliance with the annual SO2 limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000).

c. Emission Limitation:

263.8 lbs CO/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable CO emission limitation above in accordance with the record keeping requirements specified in d)(4) of this permit.

If required, the permittee shall demonstrate compliance the hourly allowable CO emission limitation by testing in accordance with Methods 1 - 4 and 10 of 40 CFR, Part 60, Appendix A.

d. Emission Limitation:

75.7 lbs VOC/hr

Applicable Compliance Method:

This emissions limitation was established using a manufacturer generated computer model run under the worst case scenario for this pollutant.

If required, the permittee shall demonstrate compliance the hourly allowable VOC emission limitation by testing in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

e. Emission Limitation:

71.2 lbs NOx/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable NOx emission limitation in accordance with the record keeping requirements specified in d)(5) of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable NOx emission limitation by testing in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

f. Emission Limitation:

98.0 tons CO, as a rolling, 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable CO emission limitation based on the monitoring and record keeping requirements specified in d)(1) of this permit.

g. Emission Limitation:

30.0 tons VOC, as a rolling, 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable VOC emission limitation based on the monitoring and record keeping requirements specified in d)(1) of this permit.

h. Emission Limitation:

65.0 tons NOx, as a rolling, 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable NOx emission limitation based on the monitoring and record keeping requirements specified in d)(1) of this permit.

i. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation in accordance with OAC rule 3745-17-03 (B)(1).

g) Miscellaneous Requirements

(1) None.