Ohio Environmental Protection Agency

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

4/28/2016

Certified Mail

David Chamberlain
AMP Napoleon Peaking Plant
1111 Schrock Road
Columbus, OH 43229

Facility ID: 0335010056
Permit Number: P0120424
County: Henry

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA)Preliminary Proposed Title V permit that was issued in draft form on 3/16/2016. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. 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. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael E. Hopkins, P.E
Assistant ChiefPermitting Section, DAPC

Cc: Ohio EPA DAPC, Northwest District Office

Response to Comments

Facility ID:	0335010056
Facility Name:	AMP Napoleon Peaking Plant
Facility Description:	Napoleon Generating Station
Facility Address:	775 Interchange Drive Napoleon, OH 43545 Henry County
Permit:	P0120424, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Northwest-Signal on 03/24/2016. The comment period ended on 04/23/2016.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

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

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

No public comments were received.

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
AMP Napoleon Peaking Plant

Facility ID:	0335010056
Permit Number:	P0120424
Permit Type:	Renewal
Issued:	4/28/2016
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
AMP Napoleon Peaking Plant

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Authorization

Facility ID:	0335010056
Facility Description:	Napoleon Generating Station
Application Number(s):	A0055530
Permit Number:	P0120424
Permit Description:	Renewal Title V operating permit for two turbines at an electric power generation peaking plant.
Permit Type:	Renewal
Issue Date:	4/28/2016
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0119750

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

AMP Napoleon Peaking Plant
775 Interchange Drive
Napoleon, OH 43545

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.

C. Emissions Unit Terms and Conditions

1. P001, CT-2

Operations, Property and/or Equipment Description:

16.5 MW NG fired turbine W/SCR

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)(7), d)(8), and d)(9).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI# P0119707 issued 12/17/15)	Nitrogen oxides (NOx) emissions shall not exceed 14 ppmvd at 15% oxygen. 0.0516 lb NOx/mmBtu of actual heat input. 0.112 lb carbon monoxide (CO)/mmBtu of actual heat input. 3.56 lbs particulate emissions (PE)/hour & 4.0 tons PE/yr 1.45 lbs sulfur dioxide (SO2)/hr& 1.6 tons SO2/yr. 2.29 lbs volatile organic compounds (VOC)/hr& 2.6 tons VOC/yr. 0.18 lb formaldehyde/hr& 0.2 ton formaldehyde/yr. startup and shutdown emissions: 2.5 tons NOx/yr and 1.0 ton CO/yr. Visible PE from any stack shall not exceed 10 percent opacity, as a six-minute average. See b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D) (PTI# P0119707 issued 12/17/15)	14.8 tons NOx per rolling, 12-month period. 32.0 tons CO per rolling, 12-month period. See c)(1) and b)(2)c.
c.	OAC rule 3745-17-11(B)(4)	See b)(2)a.
d.	OAC rule 3745-17-07(A)	See b)(2)a.
e.	OAC rule 3745-18-06(F)	See b)(2)a.
f.	40 CFR 60, Subpart GG	See b)(2)b.

(2) Additional Terms and Conditions

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

b. The emission limitation and sulfur content restriction [see c)(3) below] specified by this rule is less stringent than the emission limitation and sulfur content restriction established pursuant to OAC rule 3745-31-05(A)(3). Except as provided for in the terms and conditions of this permit, the permittee is not exempt from meeting any additional requirements of 40 CFR Part 60, Subpart GG.

c. The rolling, 12-month emission limitations established in this permit do not include emissions from startups and shutdowns.

d. The 3.56 lbs PE/hr, 1.45 lbs SO2/hr, 2.29 lbs VOC/hr and 0.18 lb formaldehyde/hr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping or reporting requirements to ensure compliance with these emission limitations.

c) Operational Restrictions

(1) The maximum annual natural gas usage for this emissions unit shall not exceed 571,986,000 cubic feet per rolling, 12-month period, based upon a monthly summation of the monthly quantity of natural gas used.

[OAC rule 3745-77-07(A)(1) and PTI# P0119707]

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

[OAC rule 3745-77-07(A)(1) and PTI# P0119707]

(3) The maximum sulfur content of the natural gas burned in this emissions unit shall not exceed 2 gr/100 cf.

[OAC rule 3745-77-07(A)(1) and PTI# P0119707]

(4) The maximum heat input rating for this emissions unit is 254.2 mmBtu/hr. This value corresponds to a maximum natural gas flow rate of 254,216 cf/hr with a heat content of 1000 Btu/cf. The permittee shall operate this emissions unit within the parameters specified above, except for startup and shutdown periods. Startup periods shall be defined as the first 60 minutes in duration. Shutdown periods shall not exceed 30 minutes in duration.

[OAC rule 3745-77-07(A)(1) and PTI# P0119707]

(5) With the exception of startup and shutdown periods, this emissions unit shall be operated at 100% load. For environmental compliance purposes, 100% load is achieved when the control system receives confirmation from the plant's information management system that the conditions for 100% load are met. The permittee may petition the Ohio EPA to operate at a greater load range if it can demonstrate to the agency's satisfaction that the emissions unit will comply with all applicable emission limits in this permit.

[OAC rule 3745-77-07(A)(1) and PTI# P0119707]

d) Monitoring and/or Recordkeeping Requirements

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

a. the quantity of natural gas used, in cubic feet;

b. the rolling, 12-month quantity of natural gas used, in cubic feet;

c. the NOx and CO emission rates*, in pounds;

d. the rolling, 12-month NOx and CO emissions rates*, in tons;

e. the number of hours of operation for startup and shutdown periods;

f. the NOx and CO emission rates* for the startup and shutdown periods, in tons; and

g. the annual, year-to-date NOx and CO emission rates*, in tons, associated with the startup and shutdown periods (summation of d)(1)f. for each pollutant).

* The permittee shall use the continuous emissions monitoring system (CEMS) for calculating the NOx emissions or use a continuous monitoring system that is consistent with the Low Mass Emitter (LME) requirements of 40 CFR 75.19. The permittee may use the default emission factors of 13.0 lbs CO/hr (for

startups/shutdowns) and 0.112 lb CO/mmBtu of actual heat input (for all other operating periods) for calculating CO emissions, if alternative CO testing data is not available from this or a similar emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(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.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(3) Analyses for the purposes of determining the sulfur content of the natural gas may be performed by the permittee, the fuel vendor, or any other qualified agency as follows: ASTM D 2880-71, 78, or 96 shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-80 or 90 (Re-approved 1994), D 4084-82 or 94, D 3246-81, 92, or 96 (updated to 6667), or D 5504, shall be used for the sulfur content of gaseous fuels. 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 Director (the Ohio EPA, Northwest District 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.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(4) This emissions unit shall have a control system that at a minimum shall be capable of monitoring load conditions, ammonia injection rate, and fuel flow.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(5) 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 LME requirements of 40 CFR 75.19. The permittee shall maintain records of data obtained by the continuous NOx monitoring system including, but not limited to:

a. emissions of NOx, in parts per million, on an instantaneous (one-minute) basis*;

b. emissions of NOx, in pounds per million Btu, as an hourly average;

c. results of quarterly cylinder gas audits or linearity checks*;

d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments*;

e. results of required relative accuracy test audit(s), including results in the units specified in this permit*;

f. hours of operation of the emissions unit, continuous NOx monitoring system, and control equipment;

g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NOx monitoring system;

h. the date, time, hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NOx monitoring system; as well as,

i. the reason (if known) and the corrective actions taken (if any) for each such event in d)(5)(g) and d)(5)(h).

*If a CEMs is being employed.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(6) If applicable, the permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPAs Central Office documenting that the continuous NO_x monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2; and has been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75. The letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be made available to the OEPA Northwest District Office upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

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

a. Pollutant: Formaldehyde

TLV (ug/m3): 273 (Converted from the STEL)

Maximum Hourly Emission Rate (lbs/hr): 0.52*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.38

MAGLC (ug/m3): 6.49

b. Pollutant: Sulfuric Acid

TLV (ug/m3): 1000

Maximum Hourly Emission Rate (lbs/hr): 1.43*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3.81

MAGLC (ug/m3): 23.8

c. Pollutant: Ammonia

TLV (ug/m3): 17000

Maximum Hourly Emission Rate (lbs/hr): 11.2*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.7

MAGLC (ug/m3): 404.8

* This was modeled for emissions units P001 & P002 combined.

[PTI# P0119707]

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

[PTI# P0119707]

(9) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

a. description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[PTI# P0119707]

e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

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

a. 571,986,000 cubic feet of natural gas per rolling, 12-month period;

b. 14.8 tons of NOx per rolling, 12-month period; and

c. 32.0 tons of CO per rolling, 12-month period.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(3) The permittee shall submit quarterly deviation (excursion) reports that identify any record which shows that the sulfur content of the natural gas exceeded 2 gr/100 cu. ft.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(4) The permittee shall submit deviation (excursion) reports that identify all periods of time when this emissions unit was not in compliance with the requirements established in c)(4) and c)(5) above.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(5) The permittee shall submit quarterly reports that document the date, time, and duration of each malfunction and/or period of downtime of the control system, while the emissions unit was in operation, and the reason (if known) and the corrective actions taken (if any) for each such event.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(6) If applicable, the permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NO_x monitoring system:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of NO_x emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, 40 CFR Parts 75 and 76, OAC Chapters 3745-14 and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).

b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

i. the facility name and address;

ii. the manufacturer and model number of the continuous NO_x and other associated monitors;

iii. a description of any change in the equipment that comprises the CEMS, including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;

iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;

v. the total NO_x emissions for the calendar quarter (tons);

vi. the total operating time (hours) of the emissions unit;

vii. the total operating time of the continuous NO_x monitoring system while the emissions unit was in operation;

viii. results and dates of quarterly cylinder gas audits or linearity checks;

ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));

x. unless previously submitted, the results of any relative accuracy test audit showing the continuous NO_x monitor out-of-control and the compliant results following any corrective actions;

xi. the date, time, and duration of any/each malfunction** of the continuous NO_x monitoring system, emissions unit, and/or control equipment;

xii. the date, time, and duration of any downtime** of the continuous NO_x monitoring system and/or control equipment while the emissions unit was in operation; and

xiii. the reason (if known) and the corrective actions taken (if any) for each event in e)(6)(b)(xi) and e)(6)(xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR 75 are not to be used for showing compliance with the short term OAC 3745-31-05(A)(3) rule-based limitation in this permit.

* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

** each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(7) If applicable, the permittee shall collect, record, and maintain measurements, data, records, and reports required per 40 CFR Part 75; and shall submit certification, recertification, notifications, applications, monitoring plans, petitions for alternative monitoring systems, electronic quarterly reports, and any other pertinent record and/or report to the Administrator (U.S. EPA), as required by this Part.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(8) The permittee shall submit annual reports that summarize the following: (a) the actual annual number of hours for startups and shutdowns, and (b) the actual annual NOx and CO emissions (during startups and shutdowns) for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

f) Testing Requirements

(1) Ongoing compliance with the NO_x emission limitations contained in this permit, and any other applicable standards shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60 and 40 CFR Part 75 as applicable.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

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

a. Emission Limitations:

NOx emissions shall not exceed 14 ppmvd at 15% Oxygen, 0.0516 lb NOx/mmBtu of actual heat input, and 14.8 tons NOx per rolling, 12-month period.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the NOx outlet concentration and lbs/mmBtu emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1-4 and 7.

[Compliance with the NOx outlet concentration and lb/mmBtu emission limitations has been demonstrated based on the results of emissions testing conducted on this or a similar emissions unit in accordance with approved US EPA Test Methods, and with the monitoring and record keeping requirements established in d(5) above.]

Compliance with the rolling, 12-month NOx emission limitation shall be based on the monitoring and record keeping requirements established in d)(1) above.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

b. Emission Limitations:

0.112 lb CO/mmBtu of actual heat input and 32.0 tons CO per rolling, 12-month period

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the lb CO/mmBtu limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1-4, and 10.

[Compliance with the CO lb/mmBtu emission limitation has been demonstrated based on the results of emissions testing conducted on this or a similar emissions unit in accordance with approved US EPA Test Methods.]

Compliance with the rolling, 12-month CO emission limitation shall be determined based on the record keeping established in d)(1) above.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

c. Emission Limitations:

3.56 lbs PE/hr and 4.0 tons PE/yr

Applicable Compliance Method:

The hourly PE limitation was established by multiplying the maximum heat input rate of 254.2 mmBtu/hr by the vendor-supplied emission factor of 0.0140 lb PE/mmBtu.

If required, the permittee shall demonstrate compliance with the hourly and lb PE/mmBtu emission limitations through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.

The annual emission limitation was established by multiplying the vendor-supplied emission factor of 0.0140 lb PE/mmBtu, by the maximum annual natural gas usage of 571,986,000 cf, multiplied by the heat content of 0.001 mmBtu/cf, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the rolling, 12-month natural gas usage restriction, compliance with the annual emission limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

d. Emission Limitations:

1.45 lbs SO2/hr and 1.6 tons SO2/yr

Applicable Compliance Method:

The hourly SO2 emission limitation was established by multiplying the maximum sulfur content (2 gr/100 cf) by the maximum hourly natural gas flow rate (254,216 cf/hr), then divide by 7000 gr/lb, and multiplying by 2*.

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.

The annual SO2 emission limitation was established by multiplying the maximum sulfur content (2 gr/100 cf) by the maximum by the maximum annual natural gas usage of 571,986,000 cf, then dividing by 7000 gr/lb and 2000 lbs/ton, and multiplying by 2*. Therefore, provided compliance is shown with the rolling, 12-month natural gas usage restriction, compliance with the annual emission limitation shall be demonstrated.

* S to SO2 conversion factor

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

e. Emission Limitations:

2.29 lbs VOC/hr and 2.6 tons VOC/yr

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established by multiplying the maximum heat input rate of 254.2 mmBtu/hr by the vendor-supplied emission factor of 0.0090 lb VOC/mmBtu.

If required, the permittee shall demonstrate compliance with the hourly allowable 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, as appropriate.

The annual emission limitation was established by multiplying the vendor-supplied emission factor of 0.0090 lb VOC/mmBtu by the maximum annual natural gas usage of 571,986,000 cf, multiplied by the heat content of 0.001 mmBtu/cf, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the rolling, 12-month natural gas usage restriction, compliance with the annual emission limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

f. Emission Limitations:

0.18 lb/hr formaldehyde and 0.2 ton formaldehyde/yr

Applicable Compliance Method:

The hourly allowable formaldehyde emission limitation was established by multiplying the maximum heat input rate of 254.2 mmBtu/hr by the emission factor of 0.00071 lb formaldehyde/mmBtu (from AP-42, Table 3.1-3, revised 4/00).

If required, the permittee shall demonstrate compliance with the hourly allowable formaldehyde emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 320.

The annual emission limitation was established by multiplying the vendor-supplied emission factor of 0.00071 lb formaldehyde/mmBtu, by the maximum annual natural gas usage of 571,986,000 cf, multiplied by the a heat content of 0.001 mmBtu/cf, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the rolling, 12-month natural gas usage restriction, compliance with the annual emission limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

g. Emission Limitations:

Startup and shutdown emissions: 2.5 tons NOx/yr and 1.0 ton CO/yr

Applicable Compliance Method:

Compliance with the annual allowable NOx and CO emission limitations shall be determined based on the record keeping requirements established in d)(1) above.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

h. Emission Limitation:

Visible PE from any stack shall not exceed 10 percent opacity as a six-minute average.

Applicable Compliance Method:

Compliance with the visible PE limitation shall be determined by Method 9, 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

g) Miscellaneous Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

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

If a CEMS is employed, the plan shall include the requirement to conduct relative accuracy test audits for the continuous NO_x monitoring system in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow

relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

If a CEMS is employed, the plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits pursuant to 40 CFR Part 60, and linearity checks pursuant to 40 CFR Part 75; however, linearity checks completed pursuant to 40 CFR Part 75, Appendix B, may be substituted for the quarterly cylinder gas or relative accuracy audits required per 40 CFR Part 60.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(3) In accordance with good engineering practices, the SCR unit serving emissions unit P001 shall be installed, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall maintain on site a copy of the operation & maintenance manual, as provided by the manufacturer.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

2. P002, CT-1

Operations, Property and/or Equipment Description:

33 MW NG fired turbine W/SCR

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)(7), d)(8), and d)(9).

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI# P0119707 issued 12/17/15)	Nitrogen oxides (NOx) emissions shall not exceed 14 ppmvd at 15% oxygen. 0.0516 lb NOx/mmBtu of actual heat input. 0.112 lb carbon monoxide (CO)/mmBtu of actual heat input. 6.61 lbs particulate emissions (PE)/hr& 7.4 tons PE/yr. 2.69 lbs sulfur dioxide (SO2)/hr& 3.0 tons SO2/yr. 4.25 lbs volatile organic compounds (VOC)/hr& 4.80 tons VOC/yr. 0.34 lb formaldehyde/hr& 0.3 ton formaldehyde/yr. startup and shutdown emissions: 12.6 tons NOx/yr and 4.3 tons CO/yr. Visible PE from any stack shall not exceed 10 percent opacity, as a six-minute average. See b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D) (PTI# P0119707 issued 12/17/15)	59.5 tons CO per rolling, 12-month period. 27.4 tons NOx per rolling, 12-month period. See c)(1) and b)(2)c.
c.	OAC rule 3745-17-11(B)(4)	See b)(2)a.
d.	OAC rule 3745-17-07(A)	See b)(2)a.
e.	OAC rule 3745-18-06(F)	See b)(2)a.
f.	40 CFR 60, Subpart GG	See b)(2)b.

(2) Additional Terms and Conditions

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

b. The emission limitation and sulfur content restriction [see c)(3) below] specified by this rule is less stringent than the emission limitation and sulfur content restriction established pursuant to OAC rule 3745-31-05(A)(3). Except as provided for in the terms and conditions of this permit, the permittee is not exempt from meeting any additional requirements of 40 CFR Part 60, Subpart GG.

c. The rolling 12-month emission limitations established in this permit do not include emissions from startups and shutdowns.

d. The 6.61 lbs PE/hr, 2.69 lbs SO2/hr, 4.28 lbs VOC/hr and 0.34 lb formaldehyde/hr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping or reporting requirements to ensure compliance with these emission limitations.

c) Operational Restrictions

(1) The maximum annual natural gas usage for this emissions unit shall not exceed 1,062,369,000 cubic feet per rolling, 12-month period, based upon a monthly summation of the quantity of natural gas used.

[OAC rule 3745-77-07(A)(1) and PTI# P0119707]

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

[OAC rule 3745-77-07(A)(1) and PTI# P0119707]

(3) The maximum sulfur content of the natural gas shall not exceed 2 gr/100 cu. ft.

[OAC rule 3745-77-07(A)(1) and PTI# P0119707]

(4) The maximum heat input rating for this emissions unit is 472.2 mmBtu/hr. This value corresponds to a maximum natural gas flow rate of 472,164 cf/hr with a heat content of 1000 Btu/cf. The permittee shall operate this emissions unit within the parameters specified above, except for startup and shutdown periods. Startup periods shall be defined as the first 60 minutes in duration. Shutdown periods shall not exceed 30 minutes in duration.

[OAC rule 3745-77-07(A)(1) and PTI# P0119707]

(5) With the exception of startup and shutdown periods, this emissions unit shall be operated at 100% load. For environmental compliance purposes, 100% load is achieved when the control system receives confirmation from the plant's information management system that the conditions for 100% load are met. The permittee may petition the Ohio EPA to operate at a greater load range if it can demonstrate to the agency's satisfaction that the emissions unit will comply with all applicable emission limits in this permit.

[OAC rule 3745-77-07(A)(1) and PTI# P0119707]

d) Monitoring and/or Recordkeeping Requirements

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

a. the quantity of natural gas used, in cubic feet;

b. the rolling, 12-month quantity of natural gas used, in cubic feet;

c. the NOx and CO emission rates*, in pounds;

d. the rolling, 12-month NOx and CO emissions rates*, in tons;

e. the number of hours of operation for startup and shutdown periods;

f. the NOx and CO emission rates* for the startup and shutdown periods, in tons; and

g. the annual, year-to-date NOx and CO emission rates*, in tons, associated with the startup and shutdown periods (summation of d)(1)f. for each pollutant).

* The permittee shall use the continuous emissions monitoring system (CEMS) data for calculating the NOx emissions or use a continuous monitoring system that meets the Low Mass Emitter (LME) requirements of 40 CFR 75.19. The permittee may use the default emission factors of 13.0 lbs CO/hr (for

startups/shutdowns) and 0.112 lb CO/mmBtu of actual heat input (for all other operating periods) for calculating CO emissions, if alternative CO testing data is not available from this or a similar emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(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.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(3) Analyses for the purposes of determining the sulfur content of the natural gas may be performed by the permittee, the fuel vendor, or any other qualified agency as follows: ASTM D 2880-71, 78, or 96 shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-80 or 90 (Re-approved 1994), D 4084-82 or 94, D 3246-81, 92, or 96 (updated to 6667), or D 5504, shall be used for the sulfur content of gaseous fuels. 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 Director (the Ohio EPA, Northwest District 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) This emissions unit shall have a control system that at a minimum shall be capable of monitoring load conditions, ammonia injection rate, and fuel flow.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(5) 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 meets the LME requirements of 40 CFR 75.19. The permittee shall maintain records of data obtained by the continuous NOx monitoring system including, but not limited to:

a. emissions of NOx, in parts per million, on an instantaneous (one-minute) basis*;

b. emissions of NOx, in pounds per million Btu, as an hourly average;

c. results of quarterly cylinder gas audits or linearity checks*;

d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments*;

e. results of required relative accuracy test audit(s), including results in the units specified in this permit*;

f. hours of operation of the emissions unit, continuous NOx monitoring system, and control equipment;

g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NOx monitoring system;

h. the date, time, hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NOx monitoring system; as well as,

i. the reason (if known) and the corrective actions taken (if any) for each such event in d)(5)(g) and d)(5)(h).

*If a CEMs is being employed.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(6) If applicable, the permittee shall maintain on-site, the document(s) of certification received from the U.S. EPA or the Ohio EPAs Central Office documenting that the continuous NO_x monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2; and has been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75. The letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be made available to the OEPA Northwest District Office upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

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

a. Pollutant: Formaldehyde

TLV (ug/m3): 273 (Converted from the STEL)

Maximum Hourly Emission Rate (lbs/hr): 0.52*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.38

MAGLC (ug/m3): 6.49

b. Pollutant: Sulfuric Acid

TLV (ug/m3): 1000

Maximum Hourly Emission Rate (lbs/hr): 1.43*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3.81

MAGLC (ug/m3): 23.8

c. Pollutant: Ammonia

TLV (ug/m3): 17000

Maximum Hourly Emission Rate (lbs/hr): 11.2*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.7

MAGLC (ug/m3): 404.8

* This was modeled for emissions units P001 & P002 combined.

[PTI# P0119707]

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

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

[PTI# P0119707]

(9) If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

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

a. description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

[PTI# P0119707]

e) Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

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

a. 1,062,369,000 cubic feet of natural gas per rolling, 12-month period;

b. 27.4 tons of NOx per rolling, 12-month period; and

c. 59.5 tons of CO per rolling, 12-month period.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(3) The permittee shall submit quarterly deviation (excursion) reports that identify any record which shows that the sulfur content of the natural gas exceeded 2 gr/100 cu. ft.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(4) The permittee shall submit deviation (excursion) reports that identify all periods of time when this emissions unit was not in compliance with the requirements established in c)(4) and c)(5) above.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(5) The permittee shall submit quarterly reports that document the date, time, and duration of each malfunction and/or period of downtime of the control system, while the emissions unit was in operation, and the reason (if known) and the corrective actions taken (if any) for each such event.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(6) If applicable, the permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NO_x monitoring system:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of NO_x emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, 40 CFR Parts 75 and 76, OAC Chapters 3745-14 and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).

b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

i. the facility name and address;

ii. the manufacturer and model number of the continuous NO_x and other associated monitors;

iii. a description of any change in the equipment that comprises the CEMS, including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;

iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;

v. the total NO_x emissions for the calendar quarter (tons);

vi. the total operating time (hours) of the emissions unit;

vii. the total operating time of the continuous NO_x monitoring system while the emissions unit was in operation;

viii. results and dates of quarterly cylinder gas audits or linearity checks;

ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));

x. unless previously submitted, the results of any relative accuracy test audit showing the continuous NO_x monitor out-of-control and the compliant results following any corrective actions;

xi. the date, time, and duration of any/each malfunction** of the continuous NO_x monitoring system, emissions unit, and/or control equipment;

xii. the date, time, and duration of any downtime** of the continuous NO_x monitoring system and/or control equipment while the emissions unit was in operation; and

xiii. the reason (if known) and the corrective actions taken (if any) for each event in e)(6)(b)(xi) and e)(6)(xii).

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR 75 are not to be used for showing compliance with the short term OAC 3745-31-05(A)(3) rule-based limitation in this permit.

* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

** each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(7) If applicable, the permittee shall collect, record, and maintain measurements, data, records, and reports required per 40 CFR Part 75; and shall submit certification, recertification, notifications, applications, monitoring plans, petitions for alternative monitoring systems, electronic quarterly reports, and any other pertinent record and/or report to the Administrator (U.S. EPA), as required by this Part.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(8) The permittee shall submit annual reports that summarize the following: (a) the actual annual number of hours for startups and shutdowns, and (b) the actual annual NOx and CO emissions (during startups and shutdowns) for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

f) Testing Requirements

(1) Ongoing compliance with the NO_x emission limitations contained in this permit, and any other applicable standards shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60 and 40 CFR Part 75, as applicable,

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

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

a. Emission Limitations:

NOx emissions shall not exceed 14 ppmvd at 15% Oxygen, 0.0516 lbs NOx/mmBtu of actual heat input and 27.4 tons NOx per, rolling 12-month period

Applicable Compliance Method:

If required, the permittee shall further demonstrate compliance with the NOx outlet concentration and lbs/mmBtu emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1-4 and 7.

[Compliance with the NOx outlet concentration and lb/mmBtu emission limitations has been demonstrated based on the results of emissions testing conducted on this or a similar emissions unit in accordance with approved US EPA Test Methods, and with the monitoring and record keeping requirements established in d(5) above.]

Compliance with the rolling, 12-month NOx emission limitation shall be based on the monitoring and record keeping requirements established in d)(1) above.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

b. Emission Limitations:

0.112 lb CO/mmBtu heat input and 59.5 tons CO per rolling, 12-month period

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the lb CO/mmBtu limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1-4, and 10.

[Compliance with the CO lb/mmBtu emission limitation has been demonstrated based on the results of emissions testing conducted on this or a similar emissions unit in accordance with approved US EPA Test Methods.]

Compliance with the rolling, 12-month CO emission limitation shall be determined based on the record keeping established in d)(1) above.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

c. Emission Limitations:

6.61 lbs PE/hr and 7.4 tons PE/yr

Applicable Compliance Method:

The hourly PE limitation was established by multiplying the maximum heat input of 472.2 mmBtu/hr by the vendor-supplied emission factor of 0.0140 lb PE/mmBtu.

If required, the permittee shall demonstrate compliance with the hourly and lb PE/mmBtu emission limitations through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.

The annual emission limitation was established by multiplying the vendor-supplied emission factor of 0.0140 lb PE/mmBtu, by the maximum annual natural gas usage of 1,062,369,000 cf, multiplied by the a heat content of 0.001 mmBtu/cf, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the rolling, 12-month natural gas usage restriction, compliance with the annual emission limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

d. Emission Limitations:

2.69 lbs SO2/hr and 3.0 tons SO2/yr

Applicable Compliance Method:

The hourly SO2 emission limitation was established by multiplying the maximum sulfur content (2 gr/100 cf) by the maximum hourly natural gas flow rate (472,164 cf/hr), divide by 7000 gr/lb; and multiply by 2*.

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.

The annual SO2 emission limitation was established by multiplying the maximum sulfur content (2 gr/100 cf) by the maximum by the maximum annual natural gas usage of 1,062,369,000 cf, then dividing by 7000 gr/lb and 2000 lbs/ton, and multiplying by 2*. Therefore, provided compliance is shown with the rolling, 12-month natural gas usage restriction, compliance with the annual emission limitation shall be demonstrated.

*S to SO2 conversion factor

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

e. Emission Limitations:

4.25 lbs VOC/hr and 4.8 tons VOC/yr

Applicable Compliance Method:

The hourly allowable VOC emission limitation was established by multiplying the maximum heat input of 472.2 mmBtu/hr by the vendor-supplied emission factor of 0.0090 lb VOC/mmBtu.

If required, the permittee shall demonstrate compliance with the hourly allowable 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, as appropriate.

The annual emission limitation was established by multiplying the vendor-supplied emission factor of 0.0090 lb VOC/mmBtu, by the maximum annual natural gas usage of 1,062,369,000 cf, multiplied by the a heat content of 0.001 mmBtu/cf, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the rolling, 12-month natural gas usage restriction, compliance with the annual emission limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

f. Emission Limitations:

0.34 lb/hr formaldehyde and 0.3 ton formaldehyde/yr

Applicable Compliance Method:

The hourly allowable formaldehyde emission limitation was established by multiplying the maximum heat input rate of 472.2 mmBtu/hr by the emission factor of 0.00071 lb formaldehyde/mmBtu (from AP-42, Table 3.1-3, revised 4/00).

If required, the permittee shall demonstrate compliance with the hourly allowable formaldehyde emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 320.

The annual emission limitation was established by multiplying the vendor-supplied emission factor of 0.00071 lb formaldehyde/mmBtu, by the maximum annual natural gas usage of 1,062,369,000 cf, multiplied by the a heat content of 0.001 mmBtu/cf, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the rolling, 12-month natural gas usage restriction, compliance with the annual emission limitation shall be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

g. Emission Limitations:

Startup and shutdown emissions - 12.6 tons NOx/yr and 4.3 tons CO/yr

Applicable Compliance Method:

Compliance with the annual allowable NOx and CO emission limitations shall be determined based on the record keeping requirements established in d)(1) above.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

h. Emission Limitation:

Visible PE from any stack shall not exceed 10 percent opacity, as a six-minute average.

Applicable Compliance Method:

Compliance with the visible PE limitation shall be determined by Method 9, 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

g) Miscellaneous Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

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

If a CEMS is employed, the plan shall include the requirement to conduct relative accuracy test audits for the continuous NO_x monitoring system in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow

relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

If a CEMS is employed, the plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits pursuant to 40 CFR Part 60, and linearity checks pursuant to 40 CFR Part 75; however, linearity checks completed pursuant to 40 CFR Part 75, Appendix B, may be substituted for the quarterly cylinder gas or relative accuracy audits required per 40 CFR Part 60.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]

(3) In accordance with good engineering practices, the SCR unit serving emissions unit P002 shall be installed, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall maintain on site a copy of the operation & maintenance manual, as provided by the manufacturer.

[OAC rule 3745-77-07(C)(1) and PTI# P0119707]