



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

7/15/2016

Certified Mail

Mr. Gareth Dolan
Troy Energy, LLC
22379 Pemberville Road
Luckey, OH 43443

Facility ID: 0387000377
Permit Number: P0119481
County: Wood

RE: FINAL AIR POLLUTION CONTROL TITLE V PERMIT
Permit Type: Minor Permit Modification

Dear Permit Holder:

Enclosed is a final Ohio Environmental Protection Agency (EPA) Air Pollution Title V permit that allows you to operate the facility in the manner indicated in the permit. Because this permit may contain several conditions and restrictions, we urge you to read it carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**
- **What should you do if you notice a spill or environmental emergency?**

How to appeal this permit

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

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

How to save money, reduce pollution and reduce energy consumption

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

How to give us feedback on your permitting experience

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

How to get an electronic copy of your permit

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

What should you do if you notice a spill or environmental emergency?

Any spill or environmental emergency which may endanger human health or the environment should be reported to the Emergency Response 24-HOUR EMERGENCY SPILL HOTLINE toll-free at (800) 282-9378. Report non-emergency complaints to the appropriate district office or local air agency.

If you have any questions regarding this permit, please contact the Ohio EPA DAPC, Northwest District Office as indicated on page one of your permit.

Sincerely,



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

Cc: U.S. EPA Region 5
Via E-Mail Notification
Ohio EPA DAPC, Northwest District Office



FINAL

**Division of Air Pollution Control
Title V Permit
for
Troy Energy, LLC**

Facility ID:	0387000377
Permit Number:	P0119481
Permit Type:	Minor Permit Modification
Issued:	7/15/2016
Effective:	7/15/2016
Expiration:	1/16/2018



Division of Air Pollution Control
Title V Permit
for
Troy Energy, LLC

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Final Title V Permit
Troy Energy, LLC
Permit Number: P0119481
Facility ID: 0387000377
Effective Date: 7/15/2016

Authorization

Facility ID: 0387000377
Facility Description: 670 MW Peaking Station Consisting of four Natural Gas/#2 Oil fired turbines and (2) 2,200,000 gallon storage tank.
Application Number(s): M0003456, A0054042, M0003814
Permit Number: P0119481
Permit Description: Title V minor permit modification to incorporate the terms of PTI# P0119482 (issued 1/07/16) and PTI# P0116436 (issued 06/13/14).
Permit Type: Minor Permit Modification
Issue Date: 7/15/2016
Effective Date: 7/15/2016
Expiration Date: 1/16/2018
Superseded Permit Number: P0111010

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

Troy Energy, LLC
22379 Pemberville Road
Luckey, OH 43443

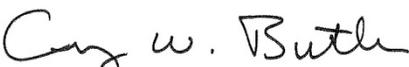
Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

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



Final Title V Permit
Troy Energy, LLC
Permit Number: P0119481
Facility ID: 0387000377
Effective Date: 7/15/2016

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 recordings for 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 submitted scheduled maintenance requests, 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 permit except 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

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

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
 - (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
 - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with 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 intermittent consistent 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, no emissions unit identified in this permit that has been certified 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 Requirements Under 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 the Ohio EPA DAPC, Northwest District Office.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (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 Requirements Under 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 of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the 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.



Final Title V Permit
Troy Energy, LLC
Permit Number: P0119481
Facility ID: 0387000377
Effective Date: 7/15/2016

B. Facility-Wide Terms and Conditions



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

a) None.

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

EU ID	Operations, Property and/or Equipment Description
P007	4000kw Oil Fired Emergency Generator (PBR11399)
P008	4000kw Oil Fired Emergency Generator (PBR11399)

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

EU ID	Operations, Property and/or Equipment Description
P007	4000kw Oil Fired Emergency Generator (PBR11399)
P008	4000kw Oil Fired Emergency Generator (PBR11399)

The permittee must comply with all applicable requirements of 40 CFR Part 63, Subpart ZZZZ. The permittee shall also comply with all the applicable requirements of 40 CFR Part 63, Subpart A (General Provisions) as identified in Table 8 of 40 CFR Part 63, Subpart ZZZZ. Compliance with all applicable requirements shall be achieved by the dates set forth in 40 CFR Part 63, Subpart ZZZZ and 40 CFR Part 63, Subpart A.

In accordance with 40 CFR Part 63, Subpart ZZZZ section 63.6590(c), final MACT rule for “Stationary Reciprocating Internal Combustions Engines,” emissions units **P007 and P008** have no requirements under this subpart since they are subject to regulations under 40 CFR Part 60, Subpart IIII.

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

4. Emissions unit **P007 and P008** are subject to 40 CFR, Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://www.ecfr.gov> or by contacting the Ohio EPA, Northwest District Office. The permittee shall comply with all applicable requirements of 40 CFR, Part 60, Subpart IIII. The permittee shall also comply with all applicable requirements of 40 CFR, Part 60, Subpart A (General Provisions).

The permittee shall meet the following requirements contained in 40 CFR, Part 60, Subpart IIII:

60.4200	Applicability
60.4205	Emission standard for emergency engines



Final Title V Permit
Troy Energy, LLC
Permit Number: P0119481
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Effective Date: 7/15/2016

60.4207	Fuel requirements
60.4209	Monitoring requirements
60.4211	Compliance requirements
60.4214	Notifications, reporting and recordkeeping requirements
60.4218 and 60.4219	General provisions

[OAC rule 3745-77-07(A)(13) and 40 CFR Part 60, Subpart III]



Final Title V Permit
Troy Energy, LLC
Permit Number: P0119481
Facility ID: 0387000377
Effective Date: 7/15/2016

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group –A: Combustion Turbines: P001,P002,P003,P004,

EU ID	Operations, Property and/or Equipment Description
P001	1,570 mmBTU/hr combustion turbine
P002	1,570 mmBTU/hr combustion turbine
P003	1,570 mmBTU/hr combustion turbine
P004	1,570 mmBTU/hr combustion turbine

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

(1) d)(6) – d)(8).

a) 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# P0119482 issued 01/07/16)	Control requirements, See b)(2)a. When firing natural gas, emissions shall not exceed: 0.037 lb nitrogen oxides (NOx)/mmBtu heat input and 241.0 tons NOx/yr 0.0015 lb sulfur dioxide (SO2)/mmBtu heat input and 10.0 tons SO2/year 0.018 lb carbon monoxide (CO)/mmBtu heat input and 133.0 tons CO/yr 0.0017 lb volatile organic compounds (VOC)/mmBtu heat input and 12.5 tons VOC/year 0.010 lb particulate emissions (PE)/mmBtu heat input and 74.8 tons PE/yr 1.7 lbs formaldehyde/hr and 7.0 tons formaldehyde/yr

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Visible particulate emissions shall not exceed 10 percent opacity as a six-minute average</p> <p>When firing number 2 fuel oil/distillate oil, emissions shall not exceed:</p> <p>0.1765 lb NOx/mmBtu heat input and 180.8 tons NOx/yr</p> <p>0.052 lb SO₂ /mmBtu heat input and 52.8 tons SO₂/year</p> <p>0.036 lb CO/mmBtu heat input and 36.9 tons CO/yr</p> <p>0.0040 lb VOC/mmBtu heat input and 4.1 tons VOC/year</p> <p>0.020 lb PE/mmBtu heat input and 20.0 tons PE/yr</p> <p>0.48 lb formaldehyde/hr and 0.3 tons formaldehyde/yr</p>
b.	OAC rule 3745-31-05(D) (PTI# P0119482 issued 01/07/16)	<p>Group emissions limits from P001, P002, P003 and P004, combined:</p> <p>52.8 tons SO₂, 133.0 tons CO, 241.0 tons NOx, 74.8 tons PE, 7.0 tons of any individual HAP, and 16.0 tons of combined HAPs [see b)(2)e]</p> <p>All of the emission limitations above are based on rolling, 12-month periods.</p>
c.	OAC rule 3745-17-07(A)	<p>When firing number 2 fuel oil/distillate oil:</p> <p>Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as specified by rule.</p>
d.	OAC rule 3745-17-11(B)(4)	See b)(2)b.
e.	OAC rule 3745-18-06(F)	See b)(2)b.

f.	40 CFR, Part 60, Subpart GG	See b)(2)c.
g.	40 CFR, Part 75	See b)(2)d.
h.	OAC rule 3745-103	See b)(2)d.

(2) Additional Terms and Conditions

- a. The permittee shall install and maintain dry low NOx burners and a water injection system on this emissions unit.
- b. The emissions limit based on this applicable rule is less stringent than the limit established pursuant to OAC rule 3745-31-05(A)(3).
- c. The emissions limits based on this applicable rule are less stringent than the limits established pursuant to OAC rule 3745-31-05(A)(3). Except as provided for in the terms and conditions in this permit, the permittee is not exempt from meeting any additional requirements of 40 CFR Part 60, Subpart GG.
- d. If the permittee is subject to the requirements of 40 CFR, Part 75 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.
- e. The emissions of Hazardous Air Pollutants (HAPs), as defined in Section 112(b) of the Clean Air Act, from emissions units P001, P002, P003 and P004 combined, shall not exceed 7.0 tons per year for any individual HAP and 16.0 tons per year for any combination of HAPs, per rolling 12 month period.

b) Operational Restrictions

- (1) The maximum annual fuel usage for emissions units P001, P002, P003 and P004 combined, shall not exceed any of the following:

- a. 14,020 million cubic feet of natural gas per rolling 12-month period;
- b. 15.77 million gallons of number 2 fuel oil/distillate oil usage per rolling 12-month period;
- c. a cumulative 14,020 million cubic feet fuel (natural gas and number 2 fuel oil/distillate oil usage) per rolling 12-month period where:

1 million cubic feet of natural gas = 1 million cubic feet of fuel and;

1 million gallons of number 2 fuel oil/distillate oil = 889 million cubic feet of fuel

[OAC rule 3745-77-07(A)(1) and PTI #P0119482]

- (2) As specified in the permittee's PTI application, the maximum design electric output of this unit is 191.2 MW*, measured at the generator terminal, when firing natural gas. This value corresponds to a maximum natural gas flow of 1.88 million cf/hr with a lower heat value of 931 Btu/cf (1749.5 mmBtu/hr), at -10 degrees F. As specified in the permittee's

PTI application, the maximum design electric output of this unit is 196.9 MW*, measured at the generator terminal, when using number 2 fuel oil/distillate oil. This value corresponds to a maximum fuel flow of 15,306 gallons/hr with a lower heat value of 129,930 Btu/gallon (1988.7 MM Btu/hr), at -10 degrees F. The permittee shall operate this emissions unit within the design electric output of the system as specified above, except for start-up and shutdown. Start-up shall be defined as the time necessary to bring the unit to its minimum operating temperature (as recommended by the vendor), but under no circumstances shall it exceed 60 minutes in duration. Shutdown periods shall not exceed 60 minutes in duration.

* The short term emission limits in this permit are based on these maximum heat input rates, and represent the worst case emissions. Variables in determining short term emissions include citing requirements for the facility, quality of fuel, fuel flow rate with respect to ambient temperature, and operational demands from the customer. The Ohio EPA is aware that extreme temperature conditions impact the capacity of the unit and the agency may adjust the potential to emit of the emissions units accordingly.

[OAC rule 3745-77-07(A)(1) and PTI #P0119482]

- (3) With the exception of startup and shutdown periods (and during “Black Start” periods for emissions units P002 and P003), emissions units P001-P004 shall be operated at a minimum of 50% load. The permittee may petition the Ohio EPA, Northwest District Office (NWDO) 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, and modeling requirements pursuant to Engineering Guide number 69.

[OAC rule 3745-77-07(A)(1) and PTI #P0119482]

- (4) The permittee shall burn only natural gas and number 2 fuel oil/distillate oil in this emissions unit. The maximum sulfur content of the natural gas shall not exceed 0.5 grains/scf. The maximum sulfur content of the number 2 fuel oil/distillate oil shall not exceed 0.05 percent by weight.

[OAC rule 3745-77-07(A)(1) and PTI #P0119482]

c) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain monthly records of the following information for emissions units P001, P002, P003, and P004, combined:
 - a. the quantity of natural gas fired, in million cubic feet ;
 - b. the quantity of number 2 oil/distillate oil fired, in gallons;
 - c. the monthly emission rate* for PE, NO_x, SO₂, CO, any individual and combined HAP, in tons;
 - d. the rolling, 12- month summation of the quantity of natural gas fired, number 2 fuel oil/distillate oil fired, and the cumulative fuel usage [as defined in c)(1)c.]; and

- e. the rolling, 12- month summation of the emission rate for PE, NO_x, SO₂, CO, any individual and combined HAP.

* The permittee shall use continuous monitoring data or the most recent testing/emissions data or available for each respective pollutant, in conjunction with the quantity of fuel fired, as recorded above, to determine monthly emissions. The monthly emissions calculations shall include all startup and shutdown periods and all "Black Start" periods. The monthly emission calculations may also include an adjustment for the average ambient temperature for that month the unit is operating.

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

- (2) For each day during which the permittee burns a fuel other than natural gas or number 2 fuel oil/distillate oil, 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 #P0119482]

- (3) The information management system for this emissions unit shall be capable of monitoring and recording electric output (in MW), fuel flow (gallons and million cubic feet), and hours of operation.

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

- (4) 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 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 #P0119482]

- (5) Except for periods described in 40 CFR part 60.13, the permittee shall install, operate, and maintain equipment to continuously monitor* and record NO_x from this emissions unit in units of the applicable standard and those specified in this permit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13 and/or 40 CFR Part 75 or as approved by the Ohio EPA.

The permittee shall maintain records of all data obtained by the continuous NOx monitoring system including, but not limited to, parts per million NOx on an instantaneous (one-minute) basis, emissions of NOx in units of the applicable standard (with an hourly averaging period), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

* The installation and operation of systems to continuously monitor and record emissions of NOx may be performed in lieu of continuously monitoring the fuel consumption, water ratio, and nitrogen content of the fuel being fired in the turbine, as required by 40 CFR 60.334.

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

- (6) The original permit to install for these emissions units (P001, P002, P003 and P004, PTI #03-13362 issued 1/23/2007) were evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model. The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: Formaldehyde
TLV (ug/m3): 272.69
Maximum Hourly Emission Rate (lbs/hr): 3.4*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.076
MAGLC (ug/m3): 6.49

Pollutant: Sulfuric Acid
TLV (ug/m3): 1000
Maximum Hourly Emission Rate (lbs/hr): 44.0*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.983
MAGLC (ug/m3): 23.8

*This was modeled for emissions units P001, P002, P003, & P004 combined.

[PTI #P0119482]

- (7) 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, 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.).

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(QQQ)(1)(a)(ii), and a modification of the existing permit to install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than (QQQ)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

[PTI #P0119482]

- (8) 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 #P0119482]

d) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas or number 2 fuel oil/distillate oil was burned in this emissions unit. These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

- (2) The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month fuel usage limitations. These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

- (3) The permittee shall submit quarterly reports which identify each period during which an exemption for ice-fog provided in 40 CFR 60.332(f) is in effect. The report shall include the ambient conditions existing during the period, the date and time the air pollution control system was deactivated, and the date and time when the air pollution control system was reactivated.

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

- (4) The permittee shall submit deviation (excursion) reports that identify any record which shows that the sulfur content of the natural gas exceeded 0.5 grains/scf, or the sulfur content of the number 2 fuel oil/distillate oil exceed the 0.05% by weight limit established in this permit. These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

- (5) Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(l) and 3704.031 and 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, NWDO documenting the date, commencement and completion times, duration, magnitude, reason (i.e., startup and shutdown periods as defined in Condition c)(2) above, malfunctions, extreme temperature conditions, etc.), and corrective actions taken (if any), of all instances of NO_x values in excess of the applicable limits specified in the terms and conditions of this permit. These reports shall also contain the total NO_x emissions for the calendar quarter (in tons).

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

If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 31, April 30, July 31,

and October 31 of each year and shall address the data obtained during the previous calendar quarter.

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

- (6) Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(l) and 3704.031, the permittee shall submit a summary of the excess emission report pursuant to 40 CFR Part 60.7. The summary shall be submitted to the Ohio EPA, NWDO within 30 days following the end of each calendar quarter in a manner prescribed by the Director.

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

- (7) The permittee shall submit deviation (excursion) reports that identify each time when this emissions unit was not in compliance with the requirements of c)(3) above. These reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

- (8) In lieu of the excess emissions reports required in 40 CFR Part 60.334, the permittee shall submit excess and emissions reports for these emissions units in accordance with this permit.

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

e) **Testing Requirements**

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

a. Emission Limitations:

When firing natural gas:

0.037 lb NOx/mmBtu heat input and 241.0 tons NOx/yr

When firing number 2 fuel oil:

0.1765 lb NOx/mmBtu heat input and 180.8 tons NOx/yr

Applicable Compliance Method:

The permittee has demonstrated initial compliance with the above lb/mmBtu limitations. Continued compliance with these emission limitations shall be demonstrated by the continuous emissions monitoring requirement as described in condition d)(5) and the reporting requirement as described in e)(5).



Compliance with the annual emission limitations shall be determined by multiplying the maximum lbs/mmBtu rates above by the maximum fuel usage and heat values for each respective fuel as described in condition c)(1) and c)(2).

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

b. Emission Limitations:

When firing natural gas:

0.010 lb PE/mmBtu heat input and 74.8 tons PE/yr

When firing number 2 fuel oil:

0.02 lb PE/mmBtu heat input and 20.0 tons PE/yr

Applicable Compliance Method:

The permittee has demonstrated initial compliance with the lb/mmBtu heat input emission limitations. If required, the permittee shall demonstrate compliance with these limitations by testing in accordance with Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitations shall be determined by multiplying the maximum lbs/mmBtu rates above by the maximum fuel usage and heat values for each respective fuel as described in condition c)(1) and c)(2).

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

c. Emission Limitations:

When firing natural gas:

0.0015 lb SO₂/mmBtu heat input and 10.0 tons SO₂/yr

When firing number 2 fuel oil:

0.052 lb SO₂/mmBtu heat input and 52.8 tons SO₂/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the lb/mmBtu heat input limitations by maintaining compliance with conditions c)(4) and d)(4). If required, the permittee shall demonstrate compliance with these limitations by testing in accordance with Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A.

Provided compliance is demonstrated with the hourly emission limitation, compliance with the respective lbs/mmBtu heat input limitation will be assumed.



Compliance with the annual emission limitation shall be determined by the recordkeeping required in condition d)(1)e.

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

d. Emission Limitations:

When firing natural gas:

0.0017 lb VOC/mmBtu heat input and 12.5 tons VOC/yr

When firing number 2 fuel oil:

0.004 lb VOC/mmBtu heat input and 4.1 tons VOC/yr

Applicable Compliance Method:

The permittee has demonstrated initial compliance with the lb/mmBtu heat input limitations. If required, the permittee shall demonstrate compliance with these limitations by testing in accordance with Methods 1 - 4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitations shall be determined by multiplying the maximum lbs/mmBtu rates above by the maximum fuel usage and heat values for each respective fuel as described in condition c)(1) and c)(2).

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

e. Emission Limitations:

When firing natural gas:

0.018 lb CO/mmBtu heat input and 133.0 tons CO/yr

When firing number 2 fuel oil:

0.036 lb CO/mmBtu heat input and 36.9 tons CO/yr

Applicable Compliance Method:

The permittee has demonstrated initial compliance with the lb/mmBtu heat input emission limitations. If required, the permittee shall demonstrate compliance with these limitations by testing in accordance with Methods 1 - 4 and 10 of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitations shall be determined by multiplying the maximum lbs/mmBtu rates above by the maximum fuel usage and heat values for each respective fuel as described in condition c)(1) and c)(2).

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]



f. Emission Limitations:

When firing natural gas:

1.7 lb formaldehyde/hr, 7.0 tons formaldehyde/yr

When firing number 2 fuel oil:

0.48 lb formaldehyde/hr, 0.3 ton formaldehyde/yr

Applicable Compliance Method:

The permittee has demonstrated initial compliance with the lbs/hr emission limitation when firing natural gas. If required, the permittee shall demonstrate compliance with these limitations by testing in accordance with Methods 1 - 4 and 320 of 40 CFR, Part 60, Appendix A.

Compliance with the lbs/hr emission limitation when firing number 2 fuel oil shall be demonstrated by the multiplying the AP-42 emission factor table 3.1-4 (4/2000) by the maximum fuel usage defined in condition c)(2). If required, the permittee shall demonstrate compliance by emission testing in accordance with Methods 1 - 4 and 320 of 40 CFR, Part 60, Appendix A.

Compliance with the annual emission limitations shall be determined by multiplying the above hourly emission limit by the annual hours of operation.

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

g. Emission Limitations:

52.8 tons of SO₂ per rolling 12-month period

133.0 tons of CO per rolling 12-month period

241.0 tons of NO_x per rolling 12-month period

74.8 tons PE per rolling 12-month period

7.0 tons of any individual HAP per rolling 12-month period

16.0 tons of combined HAPs per rolling 12-month period

Applicable Compliance Method:

Compliance with the annual emission limitations shall be determined by the recordkeeping requirements in condition d)(1)e.

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

h. Emission Limitations:

Visible particulate emissions when burning natural gas shall not exceed 10 percent opacity as a six-minute average;

Visible particulate emissions when burning fuel oil shall not exceed 20 percent opacity as a six-minute average.

Applicable Compliance Method:

If required, compliance with the visible emissions limitations established by this permit shall be determined by Method 9, 40 CFR Part 60 Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

f) 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 would be required.

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

- (2) For the continuous NOx monitoring system, the permittee shall maintain information detailing the proposed location of the sampling site in accordance with the requirements in 40 CFR Part 60, Appendix B, Performance Specification 6 for approval by the Ohio EPA, Central Office.

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

[OAC rule 3745-77-07(C)(1) and PTI #P0119482]

2. Emissions Unit Group –B: Storage Tanks: T001,T002,

EU ID	Operations, Property and/or Equipment Description
T001	#2 fuel oil storage tank (2.2 million gallons)
T002	#2 fuel oil storage tank (2.2 million gallons)

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

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTI #03-13362 issued 1/23/2007)	Use of submerged fill 0.56 ton volatile organic compounds (VOC)/yr See b)(2)a.
b.	OAC rule 3745-21-09(L)	Exempt [see c)(1)]
c.	40 CFR, Part 60, Subpart Kb	See c)(1) Record keeping requirements [see d)(1) and d)(2)]

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of 40 CFR Part 60, Subpart Kb.

c) Operational Restrictions

(1) The permittee shall not place, store, or hold in this fixed roof tank any petroleum liquid which, as stored, has a true vapor pressure greater than or equal to 5.2 kPa (0.75 psia).

[OAC rule 3745-77-07(A)(1) and PTI #03-13362]

- (2) The annual material throughput for this emissions unit shall not exceed 15,770,000 gallons per year.

[OAC rule 3745-77-07(A)(1) and PTI #03-13362]

d) **Monitoring and/or Recordkeeping Requirements**

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

In accordance with 40 CFR 60.116b (a)(b)(c) and (d), the owner and operator of this emissions unit shall maintain records of the following information:

- a. the types of petroleum liquids stored in the tank;
- b. the period of storage;
- c. the maximum true vapor pressure (in pounds per square inch absolute), during the storage period; and
- d. the permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel (shall be kept for the life of the source).

[OAC rule 3745-77-07(C)(1) and PTI #03-13362]

- (2) Available data may be used to determine the maximum true vapor pressure, as follows:
- a. For vessels operated above or below ambient temperatures, the maximum true vapor pressure is calculated based upon the highest expected calendar-month average of the storage temperature. For vessels operated at ambient temperatures, the maximum true vapor pressure is calculated based upon the maximum local monthly average ambient temperature as reported by the National Weather Service.
 - b. For crude oil or refined petroleum products, the vapor pressure may be obtained by the following:
 - i. Available data on the Reid vapor pressure and the maximum expected storage temperature based on the highest expected calendar-month average temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API Bulletin 2517 (incorporated by reference--see Sec. 60.17), unless the Administrator specifically requests that the liquid be sampled, the actual storage temperature determined, and the Reid vapor pressure determined from the sample(s).
 - ii. The true vapor pressure of each type of crude oil with a Reid vapor pressure less than 13.8 kPa or with physical properties that preclude

determination by the recommended method is to be determined from available data and recorded if the estimated maximum true vapor pressure is greater than 3.5 kPa.

- c. For other liquids, the vapor pressure:
 - i. may be obtained from standard reference texts; or
 - ii. determined by ASTM Method D2879-83 (incorporated by reference--see Sec. 60.17); or
 - iii. measured by an appropriate method approved by the Administrator; or
 - iv. calculated by an appropriate method approved by the Administrator.

[OAC rule 3745-77-07(C)(1) and PTI #03-13362]

- (3) The permittee of each vessel storing a waste mixture of indeterminate or variable composition shall be subject to the following requirements:
 - a. Prior to the initial filling of the vessel, the highest maximum true vapor pressure for the range of anticipated liquid compositions to be stored will be determined using the methods described in section d)(3).
 - b. For vessels in which the vapor pressure of the anticipated liquid composition is above the cutoff for monitoring but below the cutoff for controls as defined in 40 CFR 60.112b(a), an initial physical test of the vapor pressure is required; and a physical test at least once every 6 months thereafter is required as determined by the following methods:
 - i. ASTM Method D2879-83 (incorporated by reference--see 40 CFR 60.17); or
 - ii. ASTM Method D323-82 (incorporated by reference--see 40 CFR 60.17); or
 - iii. as measured by an appropriate method as approved by the Administrator.

[OAC rule 3745-77-07(C)(1) and PTI #03-13362]

- (4) The permittee shall maintain monthly records of the amount (gallons per month and total gallons, to date for the calendar year) of material throughput for this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13362]

e) Reporting Requirements

- (1) If the permittee places, stores, or holds in the fixed roof tank any petroleum liquid with a true vapor pressure which is equal to or greater than 0.75 pound per square inch absolute (5.2 kPa), the permittee shall notify the Ohio EPA, NWDO within 30 days of becoming aware of the occurrence.

[OAC rule 3745-77-07(C)(1) and PTI #03-13362]

- (2) The permittee shall submit quarterly deviation (excursion) reports that identify all exceedances of the annual material throughput limitation.

[OAC rule 3745-77-07(C)(1) and PTI #03-13362]

- (3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #03-13362, issued on 1/23/07: **[e)(2)]**. The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

[OAC rule 3745-77-07(A)(3)(a)(ii)]

f) Testing Requirements

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

a. Emission Limitation:

0.56 ton VOC/yr

Applicable Compliance Method:

The emission limitation was established in accordance with EPA, AP-42 Tanks 3.1 4.09D computer program using a maximum annual throughput of 15,770,000 gallons. Compliance shall be determined in accordance with the monitoring and recordkeeping specified in section d)(4).

[OAC rule 3745-77-07(C)(1) and PTI #03-13362]

g) Miscellaneous Requirements

- (1) None.

3. Emissions Unit Group –C: Black Start Generators: P005,P006,

EU ID	Operations, Property and/or Equipment Description
P005	3,000 Kilowatt Distillate Oil-Fired Non-Emergency Electrical Generator
P006	3,000 Kilowatt Distillate Oil-Fired Non-Emergency Electrical Generator

- 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) b)(1)h. and d)(5).
- b) Applicable Emissions Limitations and/or Control Requirements
- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 60, Subpart IIII 40 CFR 60.4204(b) 40 CFR 60.4201(c) Table 7 to 40 CFR 1039.102, Tier 4	The exhaust emissions from each engine shall not exceed: 0.10 gram particulate matter emissions (PM)/kW-hr [see b)(2)k.] 0.67 grams nitrogen oxides (NO _x)/kW-hr 3.5 grams carbon monoxide (CO)/kW-hr 0.40 gram of non-methane hydrocarbons (NMHC)/kW-hr See b)(2)a., b)(2)b., b)(2)i., c)(2) and c)(4)
b.	40 CFR 60.4207(b) 40 CFR 80.510(b)	The sulfur content of the diesel fuel burned in each emissions unit shall not exceed 15 ppm or 0.0015% sulfur by weight. See b)(2)c., c)(3), d)(3) and e)(1).
c.	40 CFR 89.113 (certified by manufacturer)	20% opacity during the acceleration mode 15% opacity during the lugging mode 50% opacity during the peaks in either the acceleration or lugging modes See b)(2)b.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
d.	OAC rule 3745-31-05(D) (PTI# P0116436 issued 06/13/14)	43.95 tons CO per rolling, 12-month period 8.42 tons NO _x per rolling, 12-month period 1.25 tons particulate matter less than or equal to 10 microns in size (PM ₁₀) per rolling, 12-month period 4.88 tons volatile organic compounds (VOC) per rolling, 12-month period 0.10 ton sulfur dioxide (SO ₂) per rolling, 12-month period See b)(2)d. and c)(1)
e.	OAC rule 3745-17-07(A)	Visible particulate r emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule
f.	OAC rule 3745-17-11(B)(5)(b)	See b)(2)e.
g.	OAC rule 3745-18-06	See b)(2)f.
h.	OAC rule 3745-114-01 ORC 3704.03(F)	See d)(5)
i.	40 CFR, Part 63, Subpart ZZZZ 40 CFR 63.6590(c)	See b)(2)g.
j.	OAC rule 3745-110-03(F)	See b)(2)h.
k.	OAC rule 3745-31-05(A)(3), as effective 11/30/01 (PTI# P0116436 issued 06/13/14)	See b)(2)j.
l.	OAC rule 3745-31-05(A)(3), as effective 12/01/06 (PTI# P0116436 issued 06/13/14)	See b)(2)k.
m.	ORC 3704.03(T) (PTI# P0116436 issued 06/13/14)	See b)(2)l.

(2) Additional Terms and Conditions

- a. The stationary compression ignition (CI) internal combustion engine (ICE) is subject to and shall be operated in compliance with the requirements of 40 CFR Part 60, Subpart IIII, the standards of performance for stationary CI ICE.
- b. The stationary CI ICE has been or shall be purchased certified by the manufacturer, to emission standards as stringent as those identified in 40 CFR 60.4201(c) and found in Tier 4 of 40 CFR 1039.102, Table 7, for engines greater

than 1207 horsepower (900 kilowatt), and to the opacity standards found in 40 CFR 89.113.

- c. The quality of the diesel fuel burned in this emissions unit shall meet the following specifications on an “as received” basis:
 - i. a sulfur content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.0015 pound sulfur dioxide/MMBtu actual heat input; and 15 ppm sulfur or 0.0015% sulfur by weight;
 - ii. a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent; and
 - iii. a heating value greater than 135,000 Btu/gallon.

Compliance with the above-mentioned specifications shall be determined by using the analytical results provided by the permittee or oil supplier for each shipment of oil.

- d. This permit establishes the following federally enforceable emission limitations based on an hours of operation restriction [See c)(1)]. The federally enforceable limitations are for the purpose of avoiding Prevention of Significant Deterioration (PSD).
 - i. 43.95 tons CO per rolling, 12-month period;
 - ii. 8.42 tons NO_x per rolling, 12-month period;
 - iii. 0.10 ton SO₂ per rolling, 12-month period;
 - iv. 1.25 tons PM₁₀ per rolling, 12-month period; and
 - v. 4.88 tons VOC per rolling, 12-month period.
- e. The emission limitation specified by this rule is less stringent than the emission limitation established for particulate matter pursuant to 40 CFR Part 60, Subpart IIII.
- f. This emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(B).
- g. A new area source operating in compliance with Part 60 Subpart IIII is the demonstration of compliance for 40 CFR Part 63 Subpart ZZZZ.
- h. This engine is exempt from OAC rule 3745-110-03 per OAC rule 3745-110-03(K)(17).
- i. All emissions of particulate matter are considered to be PM₁₀.

- j. The Best Available Technology (BAT) requirements for NO_x, SO₂, VOC and PM₁₀ emissions under OAC rule 3745-31-05(A)(3), as effective 11/30/01, have been determined to be equivalent to the requirements of 40 CFR Part 63, Subpart ZZZZ.

The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

- k. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to NO_x, SO₂, VOC and PM₁₀ emissions from this air contaminant source since the calculated annual emission rate for NO_x, SO₂, VOC and PM₁₀ emissions is less than ten tons per year taking into account the federally enforceable restriction on the number of hours of operation under OAC rule 3745-31-05(D).

- l. The BAT requirements for CO emissions under ORC 3704.03(T) have been determined to be equivalent to the requirements of 40 CFR Part 63, Subpart ZZZZ.

c) Operational Restrictions

- (1) The following operational restriction has been included in this permit for the purpose of establishing the following federally enforceable requirements [see b)(2)d.):

- a. The maximum annual operating hours for each emissions unit shall not exceed 3800 hours, based upon a rolling, 12-month summation of the monthly operating hours.

[OAC rule 3745-77-07(A)(1) and PTI #P0116436]

- (2) The stationary CI ICE and any control device shall be installed, operated, and maintained according to the manufacturer's emission-related written instructions and the permittee shall only change those emission-related settings that are allowed by the manufacturer. The CI ICE must also be installed and operated to meet the applicable requirements from 40 CFR Part 89, Control of Emissions from New and In-use Non-road CI ICE; and Part 1068, the General Compliance Provisions for Engine Programs. The

permittee shall operate and maintain the stationary CI ICE to achieve the emissions standards established in 40 CFR 60.4204 over the entire life of the engine(s).

[OAC rule 3745-77-07(A)(1), 40 CFR Part 60, Subpart IIII and PTI #P0116436]

- (3) Diesel fuel burned in the CI, ICE shall not exceed the limit for sulfur as specified by 40 CFR 80.510(b), i.e., the maximum sulfur content of diesel fuel shall not exceed 15 ppm or 0.0015% sulfur by weight.

[OAC rule 3745-77-07(A)(1), 40 CFR Part 60, Subpart IIII and PTI #P0116436]

- (4) If the stationary CI internal combustion engine is equipped with a diesel particulate filter to comply with the emission standards in 40 CFR 60.4204, the diesel particulate filter must be installed with a backpressure monitor that notifies the permittee when the high backpressure limit of the engine is approached.

[OAC rule 3745-77-07(A)(1), 40 CFR Part 60, Subpart IIII and PTI #P0116436]

d) **Monitoring and/or Recordkeeping Requirements**

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

- a. the number of hours of operation;
- b. the rolling, 12-month summation of the hours of operation;
- c. beginning the first 12 calendar months of operation following startup, the rolling, 12-month summation of the emission rate for CO; and
- d. the rolling, 12-month summation of the CO emission rate.

[OAC rule 3745-77-07(C)(1) and PTI #P0116436]

- (2) For each day during which the permittee burns a fuel other than diesel fuel, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit. The permittee shall also maintain documentation on the sulfur content of all fuels burned.

[OAC rule 3745-77-07(C)(1) and PTI #P0116436]

- (3) The permittee shall maintain documents provided by the oil supplier for each shipment of diesel fuel to demonstrate compliance with the applicable SO₂ emissions standard. These documents must include the following information pursuant to 40 CFR 80.592(a):

- a. the name of the oil supplier; and
- b. a statement from the oil supplier that the oil complies with the specifications under the definition of ultra-low sulfur diesel.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart IIII and PTI #P0116436]

- (4) The permittee shall maintain the manufacturer's certification, to the applicable Tier 4 emission standards in Table 7 of 40 CFR 1039.102, on site or at a central location for all facility ICE and it shall be made available for review upon request. If the manufacturer's certification is not kept on site, the permittee shall maintain a log for the location of each ICE and it shall identify the agency-assigned emissions unit number, the manufacturer's identification number, and the identification number of the certificate. The manufacturer's operations manual and any written instructions or procedures developed by the permittee and approved by the manufacturer shall be maintained at the same location as the ICE.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart IIII and PTI #P0116436]

- (5) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires a permittee to apply for and obtain a new or modified federally enforceable permit-to-install and operate (FEPTIO) prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new FEPTIO.

[PTI #P0116436]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports which identify the following:
- a. All deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, recordkeeping and/or testing requirements of this permit:
 - i. All exceedances of the rolling, 12-month restriction of 3800 hours;
 - ii. All exceedances of the rolling, 12-month CO emission rate; and
 - iii. any period of time (date and number of hours) that the quality of oil burned in this emissions unit did not meet the requirements established in 40 CFR 80.510(b), based upon the required fuel records;
 - b. The probable cause of each deviation (excursion);
 - c. Any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
 - d. The magnitude and duration of each deviation (excursion).

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



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

[OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart IIII and PTI #P0116436]

f) Testing Requirements

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

a. Opacity Limitations:

- 20% opacity during the acceleration mode
- 15% opacity during the lugging mode
- 50% opacity during the peaks in either the acceleration or lugging modes

Applicable Compliance Method:

The permittee shall demonstrate compliance with the opacity standards of 40 CFR 89.113 based on the standard certification. Therefore, compliance with the opacity imitations above shall be assumed.[The ICE was purchased certified to the opacity standards of 40 CFR 89.113.]

[OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart IIII and PTI #P0116436]

b. Emission Limitations:

- 0.10 gram PM/kW-hr
- 3.5 grams CO/kW-hr
- 0.67 gram NO_x/kW-hr
- 0.40 gram NMHC/kW-hr

Applicable Compliance Method:

Compliance with the emission limitations above shall be based on the manufacturer's certification and by maintaining the engine according to the manufacturer's specifications. The g/kW-hr limits are the emission limitations from Table 7 of 40 CFR 1039.102, the Tier 4 exhaust emission standards for diesel engines greater than 1207 horsepower (900 kW).

If required, the permittee shall demonstrate compliance with the emission limitations through performance tests conducted in accordance with the provisions in term f)(2) below.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart IIII and PTI #P0116436]

c. Emissions Limitations:

8.42 tons NO_x per rolling, 12-month period
 1.25 tons PM₁₀ per rolling, 12-month period

Applicable Compliance Method:

The annual emission limitations above were developed by multiplying the performance standards by the power output of 3000 kW, the maximum annual operating schedule of 3800 hours/year, and then dividing by 907,185 grams/ton. Therefore, provided compliance is maintained with the hourly emission limitations and the rolling, 12-month hours of operation restriction, compliance with the annual emission limitations shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI #P0116436]

Emissions Limitations:

43.95 tons CO per rolling, 12 month period

Applicable Compliance Method:

Compliance shall be demonstrated through the recordkeeping requirements specified in condition d)(1).

[OAC rule 3745-77-07(C)(1) and PTI #P0116436]

d. Emissions Limitations:

4.88 tons VOC per rolling, 12-month period

Applicable Compliance Method:

The annual VOC emissions limit is based on using the AP-42 emission factor of 0.09 lb VOC/MMBtu from Chapter 3.4, Table 3.4-1, "Gaseous Emission Factors for Large Stationary Diesel and All Stationary Dual-Fuel Engines".

Compliance with the ton per year VOC emissions limitation shall be determined by the following calculation:

Where:

G = Gallons of diesel fuel burned in the engine during the year.

EF = AP-42 emission factor from Chapter 3.4, Table 3.4-1, 0.09 lb VOC/MMBtu.

E = Total tons of VOC/year emitted.

$$E = \sum_{i=1}^n \left(G \frac{\text{Gallons}}{\text{year}} \right) \left(\frac{137,000 \text{ Btu}}{\text{Gallon}} \right) \left(EF \frac{\text{lb}}{\text{MMBtu}} \right) \left(\frac{\text{Ton}}{2000 \text{ lb}} \right)$$

If required, the permittee shall determine a site specific VOC emission factor through exhaust emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 or 25a, as appropriate.

The heating value of the diesel fuel may be adjusted to that provided by the supplier.

[OAC rule 3745-77-07(C)(1) and PTI #P0116436]

e. Emissions Limitation:

0.10 ton SO₂ per rolling, 12-month period

Applicable Compliance Method:

Compliance with the ton per year SO₂ emissions limitation shall be determined by the following calculation from AP-42 Table 3.4-1:

Where:

G = Gallons of diesel fuel burned in the engine during the year.

S = Sulfur content of the fuel used. Since the sulfur content limit for the fuel is 0.0015%, use the value 0.0015 in the formula.

E = Total tons of SO₂/year emitted.

$$E = \left(G \frac{\text{Gallons}}{\text{year}} \right) \left(\frac{137,000 \text{ Btu}}{\text{Gallon}} \right) \left((1.01)(S) \frac{\text{lb SO}_2}{\text{mmBtu}} \right) \left(\frac{\text{Ton}}{2000 \text{ lbs}} \right)$$

If required, the permittee shall determine a site specific SO₂ emission factor through exhaust emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6, as appropriate.

The heating value of the diesel fuel may be adjusted to that provided by the supplier.

[OAC rule 3745-77-07(C)(1) and PTI #P0116436]

f. Emission Limitation:

Visible PE from the stack serving this emissions unit shall not exceed 20% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance shall be demonstrated in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI #P0116436]

- (2) If it is determined by the Ohio EPA that a compliance demonstration is required through performance testing, it shall be conducted using one of the following test methods or procedures:
- a. in accordance with 40 CFR 60.4212, conduct the exhaust emissions testing using the in-use testing procedures found in 40 CFR Part 1039, Subpart F, measuring the emissions of the regulated pollutants as specified in 40 CFR 1065; or
 - b. in accordance with 40 CFR 60.4213, conduct exhaust emissions testing using the test methods identified in Table 7 to Subpart IIII of Part 60.

If demonstrating compliance through the in-use testing procedures in 40 CFR part 1039, Subpart F, exhaust emissions from the stationary CI ICE shall not exceed the “not to exceed” (NTE) numerical requirements, rounded to the same number of decimal places as the applicable standard in 40 CFR 89.112, determined from the following equation:

$$\text{NTE requirement for each pollutant} = 1.25 \times \text{STD}$$

Where:

STD = The standard specified for the pollutant in 40 CFR 89.112.

[OAC rule 3745-77-07(C)(1), 40 CFR Part 60, Subpart IIII and PTI #P0116436]

- g) Miscellaneous Requirements
- (1) None.