State of Ohio Environmental Protection Agency

RE: PERMIT TO INSTALL DRAFT
DARKE COUNTY

Street Address:
1800 WaterMark Drive
Columbus, OH 43215-1099

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
P.O. Box 1049
Columbus, OH 43216-1049

Application No: 08-3974

DATE: April 7, 1999

AMP-Ohio, Arcanum Peaking Station
Randy Meyer
2600 Airport Drive
Columbus, OH 43219

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting.

Upon issuance of a final Permit to Install a fee of **$400** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, buy 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 Pollution Prevention at (614) 644-3469.If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA
Regional Air Pollution Control Agency

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

DRAFT OF PERMIT TO INSTALL 08-3974

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Application Number:	08-3974
APS Premise Number:	0819020236
Permit Fee:	
Name of Facility:	AMP-Ohio, Arcanum Peaking Station
Person to Contact:	Randy Meyer
Address:	2600 Airport Drive Columbus, OH 43219

Location of proposed air contaminant source(s) [emissions unit(s)]:
21 Water Street
Arcanum, **OHIO**

Description of proposed emissions unit(s):
17.53 MMBTU/HR DIESEL-FIRED ELECTRIC GENERATOR (2628 BRAKE HORSEPOWER).

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

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Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. 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, i.e., 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.)

3. Records Retention Requirements

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.

4. 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.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency 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).

6. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is

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

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources are inadequate or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit to Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year

Particulates	0.46
$S0_2$	0.54
$N0_x$	28.65
CO	2.23
OC	0.64

Emissions Unit ID: **B001**

Part II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

Operations, Property, and/or Equipment	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
17.53 MMBTU/hour diesel fired generator No. 1 (2628 brake horsepower)	OAC rule 3745-31-05	0.062 lb particulate/MMBTU actual heat input, 0.46 TPY particulates; 0.051 lb sulfur dioxide/MMBTU actual heat input and 0.53 TPY sulfur dioxide; 3.72 lbs/hour and 2.23 TPY carbon monoxide; 1.06 lbs/hour and 0.64 TPY organic compounds; 47.76 lbs/hour and 28.65 TPY nitrogen oxides;
	Synthetic Minor to avoid Title V requirements	28.65 TPY nitrogen oxides, as a rolling, 12-month summation; and 154,080 gal/yr fuel usage as a rolling 12-month summation.
	OAC rule 3745-18-06(G)	less stringent than the sulfur dioxide limit above
	OAC rule 3745-17-11(B)(5)(b)	less stringent than the particulate limit above
	OAC rule 3745-17-07(A)(1)	20% opacity visible particulate emissions, as a six-minute average, except as provided by rule

2. **Additional Terms and Conditions**

a. The 47.76 lbs/hour nitrogen oxides allowable emission rate is established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop and/or reporting requirements to ensure compliance with this limit.

b. The 3.72 lbs/hour carbon monoxide and 1.06 lbs/hour organic compounds allowable emission rates are established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop and/or reporting requirements to ensure compliance with this limit.

B. Operational Restrictions

1. The maximum diesel fuel usage for this emissions unit shall not exceed 154,080 gallons per year based upon a rolling, 12-month summation of the fuel usage.

2. To ensure enforceability during the first 12 calendar months of operation following startup of this emissions unit, the permittee shall not exceed the following diesel fuel usages for this emissions unit:

Months	Maximum Cumulative Diesel Fuel Usage, in gallons
1	25,680
1 - 2	51,360
1 - 3	77,040
1 - 4	83,460
1 - 5	89,880
1 - 6	96,300
1 - 7	109,140
1 - 8	121,980
1 - 9	134,820
1 - 10	141,240
1 - 11	147,660
1 - 12	154,080

After the first 12 calendar months of operation following the startup of this emissions unit, the permittee shall comply with the annual diesel fuel usage limitation based upon rolling, 12-month summations.

3. The quality of oil burned in this emissions unit shall meet a sulfur content that is sufficient to

comply with the allowable sulfur dioxide emission limitation specified in section A.1. above.

C. Monitoring and/or Recordkeeping Requirements

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

   a. the number of gallons of diesel fuel burned for the calendar month;

   b. during the first 12 months of operation following the startup of this emissions unit, the cumulative number of gallons of diesel fuel burned; and,

   c. the number of gallons of diesel fuel burned for the rolling, 12-month summation period (beginning the 13th calendar month after the startup of this emissions unit).

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the rolling, 12-month diesel fuel usage limitation and, for the first 12 calendar months of operation following the startup of this emissions unit, all exceedances of the maximum allowable cumulative diesel fuel usage limits. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(1).

2. The permittee shall also submit annual reports which specify the total nitrogen oxide emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year.

E. Testing Requirements

1. Compliance with the emissions limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

   a. <u>Emission Limitation</u>

      0.062 lb particulate/MMBTU actual heat input

      <u>Applicable Compliance Method</u>

      Compliance shall be based upon the reported manufacturer's emission factor of 0.006 lb particulate/gallon of fuel oil burned, divided by the heat content of the fuel oil of 0.1365 MMBTU/gallon. If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

   b. <u>Emission Limitation</u>

      0.46 TPY particulates

Applicable Compliance Method

Compliance shall be based upon as specified in C.1. and shall be the sum of the 12 monthly diesel fuel usage records for the calendar year multiplied by an emission factor of 0.006 lb particulate/gallon of fuel oil burned, divided by 2,000 pounds per ton.

c. Emission Limitation

20% opacity visible emissions, as a six-minute average

Applicable Compliance Method

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

d. Emission Limitation

47.76 lb/hour nitrogen oxides

Applicable Compliance Method

Compliance shall be based upon the reported manufacturer's emission factor of 0.372 lb nitrogen oxides/gallon of fuel oil burned, multiplied by the maximum hourly fuel burning capacity of 128.4 gallons/hour for this emissions unit. If required, compliance shall be based upon stack testing in accordance with either USEPA Reference Method 7 or 7A (as appropriate) of 40 CFR Part 60, Appendix A.

e. Emission Limitation

28.65 TPY nitrogen oxides, as a rolling, 12-month summation

Applicable Compliance Method

Compliance shall be based upon as specified in C.1. and shall be determined by multiplying each 12-month summation of the recorded fuel usages by the emission factor of 0.372 lb nitrogen oxides/gallon of fuel oil burned, and dividing by 2,000 pounds per ton.

f. Emission Limitation

0.051 lb sulfur dioxide/MMBTU actual heat input

Applicable Compliance Method

The sulfur dioxide lb/MMBTU actual heat input allowable of 0.051 is based upon the following emission factor of 1.01(S) lb/MMBTU using a sulfur content (S) of 0.05 percent. This is a one time calculation to determine compliance for the above limitation as long as the applicant maintains compliance with the fuel oil gallon restriction listed in the permit.

g. Emission Limitation

0.54 TPY sulfur dioxide

Applicable Compliance Method

Compliance shall be based upon as specified in C.1. and shall be the sum of the 12 monthly diesel fuel usage records for the calendar year multiplied by an emission factor of 0.007 lb sulfur dioxide/gallon of fuel oil burned, divided by 2,000 pounds per ton.

h. Emission Limitation

3.72 lbs/hour carbon monoxide

Applicable Compliance Method

Compliance shall be based upon the reported manufacturer's emission rate of 0.029 lb carbon monoxide/gallon of fuel oil burned, multiplied by the maximum hourly fuel burning capacity of 128.4 gallons/hour for this emissions unit. If required, compliance shall be based upon stack testing in accordance with USEPA Reference Method 10 of 40 CFR Part 60, Appendix A.

i. Emission Limitation

2.23 TPY carbon monoxide

Applicable Compliance Method

Compliance shall be based upon as specified in C.1. and shall be the sum of the 12 monthly diesel fuel usage records for the calendar year multiplied by an emission factor of 0.029 lb carbon monoxide/gallon of fuel oil burned, divided by 2,000 pounds per ton.

j. Emission Limitation

1.06 lbs/hour organic compounds

Applicable Compliance Method

Compliance shall be based upon the reported manufacturer's emission rate of 0.008 lb organic compounds/gallon of fuel oil burned, multiplied by the maximum hourly fuel burning capacity of 128.4 gallons/hour for this emissions unit.

k. Emission Limitation

0.64 TPY organic compounds

Applicable Compliance Method

Compliance shall be based upon as specified in C.1. and shall be the sum of the 12 monthly diesel fuel usage records for the calendar year multiplied by an emission factor of 0.008 lb organic compounds/gallon of fuel oil burned, divided by 2,000 pounds per ton.

F. Miscellaneous Requirements

None.