State of Ohio Environmental Protection Agency

STREET ADDRESS:
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50 W. Town St., Suite 700
Columbus, Ohio 43215

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www.epa.state.oh.us

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P.O. Box 1049
Columbus, OH 43216-1049

8/13/2008

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No	MODELING SUBMITTED

Mr. Raj Shah
Norton Energy Storage L.L.C.
2603 Augusta Boulevard, Suite 900
Houston, TX 77057

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1677105001
Permit Number: P0103620
Permit Type: Initial Installation
County: Summit

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of 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 comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Akron Beacon Journal. A copy of the public notice and the draft permit are enclosed. This permit has been posted to the Division of Air Pollution Control Web page http://www.epa.state.oh.us/dapc in Microsoft Word and Adobe Acrobat format. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install and operate will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install and Operate is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Akron Regional Air Quality Management District at (330)375-2480.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
ARAQMD; Pennsylvania; West Virginia; Canada

Summit County

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
Norton Energy Storage L.L.C.

Issue Date: 8/13/2008
Permit Number: P0103620
Permit Type: Initial Installation
Permit Description: Combustion Turbine Project
Facility ID: 1677105001
Facility Location: Norton Energy Storage L.L.C.
3700 Limestone Drive,
Norton, OH 44203
Facility Description: Electric Power Generation

Chris Korleski, Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Frank Markunas at Akron Regional Air Quality Management District, 146 South High Street, Room 904 or (330)375-2480. The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc

OhioEPA

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate
Permit Number: P0103620
Facility ID: 1677105001

Permit Strategy Write-Up

Synthetic Minor Determination Norton Energy Storage - 16-77-10-5001
P0103620

A. Source Description
Norton Energy Storage (NES) is a new facility to be located in Norton, Ohio, Summit County (moderate non-attainment area). The facility is a compressed air energy storage power generating facility. The facility consists of 6 combustion turbines (P001 – P006), 1 cooling tower (F001), and several de minimis sources (emergency generator, fire pump, and in-line heaters). NES desires to limit turbine operating hours to limit the facility's potential to emit to avoid non-attainment new source review.

B. Facility Emissions
The facility will emit NOx, CO, SO2, VOC, and PE.

PTE - turbines	Lb/hr at 100% (each turbine)	TPY
NOx	7.18	189
CO	7.28	191
VOC	2.20	58
PE/PM-10/PM2.5	3.89	102
SO2	3.53	93

PTE with 24,000 hr limitation	6 Turbines (TPY)	In Line Burners (TPY)	Start/Shut Emissions (TPY)	Cooling Tower (TPY)	Emergency Equipment (TPY)	Facility Total (TPY)
NOx	86.13	.57	7.54		.40	94.64
CO	87.30	1.86	3.06		.04	92.25
VOC	26.40	.14			.11	26.65
PE/PM-10/PM2.5	46.65	.11		4.28	.01	51.04
SO2	42.41	.09			.02	42.51

C. Operating Limitations
NES has agreed to restrict hours of operation for all combustion turbines (P001 – P006) combined to 24,000 hours. The resulting restricted potential to emit will not trigger non-attainment new source review thresholds. The permit will contain terms and conditions to limit NES to the above identified limitations.

D. Conclusions
The terms and conditions in the permit will limit the facility=s to less than non-attainment new source review thresholds and
allow to be classified as an area source. NES shall maintain daily records of actual hours of operation. Excursion reports will be required each emissions unit to ensure compliance.

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

DRAFT

Air Pollution Permit-to-Install and Operate

for

Norton Energy Storage L.L.C.

Facility ID:	1677105001
Permit Number:	P0103620
Permit Type:	Initial Installation
Issued:	8/13/2008
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

OhioEPA
State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate

for

Norton Energy Storage L.L.C.

Contents

Authorization

Facility ID: 1677105001
Application Number(s): A0035510
Permit Number: P0103620
Permit Description: Combustion Turbine Project
Permit Type: Initial Installation
Permit Fee: $0.00 DO NOT send payment at this time - subject to change before final issuance
Issue Date: 8/13/2008
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

Norton Energy Storage L.L.C.
3700 Limestone Drive
Norton, OH 44203

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

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Akron Regional Air Quality Management District
146 South High Street, Room 904
Akron, OH 44308
(330)375-2480

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0103620
Permit Description: Combustion Turbine Project

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

Emissions Unit ID:	**F001**
Company Equipment ID:	Cooling Tower
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

Group Name: Combustion Trains

Emissions Unit ID:	**P001**
Company Equipment ID:	Combustion Train #1
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	Combustion Train #2
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P003**
Company Equipment ID:	Combustion Train #3
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P004**
Company Equipment ID:	Combustion Train #4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P005**
Company Equipment ID:	Combustion Train #5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P006**
Company Equipment ID:	Combustion Train #6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee. This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.
You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as being permanently shut down without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. F001, Cooling Tower

Operations, Property and/or Equipment Description:

Cooling Tower – Induced draft mechanical wet cooling tower

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)(4)	See b.2.a below.
b.	OAC rule 3745-17-07(B)	20% opacity as a 3-minute average, except as provided by rule (fugitive emissions)
c.	OAC rule 3745-17-08(B)	See c.1 below.

(2) Additional Terms and Conditions

a. The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the particulate emissions (PE) from this air contaminant source since the uncontrolled potential to emit for PE is less than ten tons per year.

c) Operational Restrictions

(1) The permittee shall employ mist eliminators designed for 0.001% drift from the cooling tower.

d) Monitoring and/or Recordkeeping Requirements

(1) None.

e) Reporting Requirements

(1) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

f) Testing Requirements

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

Emission Limitation

20% opacity as a 3-minute average, except as provided by rule (fugitive emissions)

Applicable Compliance Method

OAC rule 3745-17-03(B)(3)

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - Combustion Trains: P001, P002, P003, P004, P005, P006,

EU ID	Operations, Property and/or Equipment Description
P001	Combustion Train #1 – 589MMBtu/hr Dresser Rand natural gas fired combustion turbine (134 MW) operating in simple cycle mode with recuperator controlled by catalytic oxidation, water injection, and selective catalytic reduction
P002	Combustion Train #2 – 589MMBtu/hr Dresser Rand natural gas fired combustion turbine (134 MW) operating in simple cycle mode with recuperator controlled by catalytic oxidation, water injection, and selective catalytic reduction
P003	Combustion Train #3 – 589MMBtu/hr Dresser Rand natural gas fired combustion turbine (134 MW) operating in simple cycle mode with recuperator controlled by catalytic oxidation, water injection, and selective catalytic reduction
P004	Combustion Train #4 – 589MMBtu/hr Dresser Rand natural gas fired combustion turbine (134 MW) operating in simple cycle mode with recuperator controlled by catalytic oxidation, water injection, and selective catalytic reduction
P005	Combustion Train #5 – 589MMBtu/hr Dresser Rand natural gas fired combustion turbine (134 MW) operating in simple cycle mode with recuperator controlled by catalytic oxidation, water injection, and selective catalytic reduction
P006	Combustion Train #6 – 589MMBtu/hr Dresser Rand natural gas fired combustion turbine (134 MW) operating in simple cycle mode with recuperator controlled by catalytic oxidation, water injection, and selective catalytic reduction

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. Sections d.1 – d.4, and e.1

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. Sections b,c,d.5 – d.14, e.2 – e.9, f, and g

b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)	The requirements of this rule also include compliance with the requirements or OAC rule 3745-103, 3745-31-05(D), 40 CFR Part 60, Subpart KKKK, and 40 CFR Part

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		75. Nitrogen oxides (NOx) emissions shall not exceed 3.0 ppmvd at 15% oxygen and 7.18 lbs/hr. Particulate emissions (PE) shall not exceed 0.0066 lb/MMbtu and 3.89 lbs/hr. Sulfur dioxide (SO2) emissions shall not exceed 0.006 lb/MMbtu and 3.53 lbs/hr. Carbon monoxide (CO) emissions shall not exceed 5.0 ppmvd at 15% oxygen and 7.28 lbs/hr. Volatile organic compounds (VOC) emissions shall not exceed 2.2 lbs/hr. Visible particulate emissions from any stack shall not exceed 10 percent opacity as a six-minute average. Permittee shall employ catalytic oxidation (CO), water injection, and selective catalytic reduction (SCR).
b.	OAC rule 3745-17-07(A)	See section b.2.a below.
c.	OAC rule 3745-17-11(B)(4)	See section b.2.a below.
d.	OAC rule 3745-18-06(F)	See section b.2.a below.
e.	OAC rule 3745-21-08(B)	See section b.2.d below.
f.	40 CFR Part 60, Subpart KKKK	NOx emissions shall not exceed 25ppm at 15%oxygen or 150 ng/J of useful output (1.2 lb/MWh) – See b.2.a below. SO2 emissions shall not exceed 110 nanograms ng/J (0.90 lb/MWh) gross output, or 26 ng/J (0.060 lb/MMBtu) heat input See sections b.2.e – b.2.l below.
g.	40 CFR Part 75	See section b.2.b below.
h.	OAC rule 3745-103	See section b.2.b below.
i.	OAC rule 3745-31-05(D)	Maximum operating hours of emissions units P001 – P006 combined shall not exceed 24,000 hours per rolling 12-month summation.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The tons per rolling 12-month period for emissions units P001 – P006 combined (including startups/shutdowns) shall not exceed: NOx – 93.67 CO – 90.36 VOC – 26.40 PE – 46.65 SO2 – 42.41

(2) Additional Terms and Conditions

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

b. If the permittee is subject to the requirements of 40 CFR Part 75 concerning acid rain, the permittee shall ensure that any effected 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.

c. The maximum annual operating hours for this emissions units P001 – P006 combined shall not exceed 24,000 hrs, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Operating Hours
1	4,000
1-2	4,000
1-3	8,000
1-4	8,000
1-5	12,000
1-6	12,000
1-7	16,000
1-8	16,000
1-9	20,000
1-10	20,000
1-11	24,000
1-12	24,000

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual combined

operating hours limitation shall be based upon a rolling, 12-month summation of the combined operating hours.

d. The permitee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745- 21-08(B) by committing to comply with the best available technology (BAT) requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install. The design of the emissions unit and the technology associated with the current operating practices satisfy the BAT requirements.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. This rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plant (SIP). Until the U.S. EPA approves the revision to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

e. § 60.4340 How do I demonstrate continuous compliance for NO_X if I do not use water or steam injection?

Permitte will use continuous emission monitoring, as follows:

i. Install, certify, maintain, and operate a continuous emission monitoring system (CEMS) consisting of a NO_X monitor and a diluent gas (oxygen (O_2) or carbon dioxide (CO_2)) monitor, to determine the hourly NO_X emission rate in parts per million (ppm) or pounds per million British thermal units (lb/MMBtu); and

ii. Install, calibrate, maintain, and operate a fuel flow meter to continuously measure the heat input to the affected unit;.

f. § 60.4345 What are the requirements for the continuous emission monitoring system equipment, if I choose to use this option?

For the NO_XCEMS :

i. Installed and certified according to appendix A of part 75 of this chapter. The relative accuracy test audit (RATA) of the CEMS shall be performed on a lb/MMBtu basis.

ii. As specified in §60.13(e)(2), during each full unit operating hour, both the NO_X monitor and the diluent monitor must complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each 15-minute quadrant of the hour, to validate the hour. For partial unit operating hours, at least one valid data point must be obtained with each monitor for each quadrant of the hour in which the unit operates. For unit operating hours in which required quality assurance and maintenance activities are performed on the CEMS, a minimum of two valid data points (one in each of two quadrants) are required for each monitor to validate the NO_X emission rate for the hour.

iii. Fuel flow meters that meet the installation, certification, and quality assurance requirements of appendix D to part 75 of this chapter are acceptable for use under this subpart.

iv. The owner or operator shall implement the QA program and plan described in section 1 of appendix B to part 75 of this chapter.

g. § 60.4350 How do I use data from the continuous emission monitoring equipment to identify excess emissions?

For purposes of identifying excess emissions:

i. All CEMS data must be reduced to hourly averages as specified in §60.13(h).

ii. For each unit operating hour in which a valid hourly average, as described in §60.4345(b), is obtained for both NO_X and diluent monitors, the data acquisition and handling system must calculate and record the hourly NO_X emission rate in units of ppm or lb/MMBtu, using the appropriate equation from method 19 in appendix A of this part. For any hour in which the hourly average O_2concentration exceeds 19.0 percent O_2(or the hourly average CO_2concentration is less than 1.0 percent CO_2), a diluent cap value of 19.0 percent O_2or 1.0 percent CO_2(as applicable) may be used in the emission calculations.

iii. Quality assured data per Part 75 from the CEMS shall be used to identify excess emissions under this subpart. Periods where the missing data substitution procedures in subpart D of part 75 are applied are to be reported as monitor downtime in the excess emissions and monitoring performance report required under §60.7(c).

iv. Required fuel flow rate must be reduced to hourly averages.

v. Calculate the hourly average NO_X emission rates, in units of the emission standards under §60.4320, using ppm

vi. Calculated hourly average emission rates from paragraph (f) of this section to assess excess emissions on a 4-hour rolling average basis, as described in §60.4380(b)(1).

h. § 60.4365 How can I be exempted from monitoring the total sulfur content of the fuel?

Monitor the total sulfur content of the fuel combusted in the turbine by a current, valid purchase contract, tariff sheet or transportation contract for the fuel, specifying that the maximum total sulfur content for natural gas use in continental areas is 20 grains of sulfur or less per 100 standard cubic feet .

i. § 60.4375 What reports must I submit?

i. For each affected unit required to continuously monitor parameters or emissions, or to periodically determine the fuel sulfur content under this

subpart, you must submit reports of excess emissions and monitor downtime, in accordance with §60.7(c). Excess emissions must be reported for all periods of unit operation, including start-up, shutdown, and malfunction.

ii. For each affected unit that performs annual performance tests in accordance with §60.4340(a), you must submit a written report of the results of each performance test before the close of business on the 60th day following the completion of the performance test.

j. § 60.4380 How are excess emissions and monitor downtime defined for NO_X?

For the purpose of reports required under §60.7(c), periods of excess emissions and monitor downtime that must be reported are defined as follows:

For turbines using continuous emission monitoring, as described in §§60.4335(b) and 60.4345:

i. An excess emissions is any unit operating period in which the 4-hour or 30-day rolling average NO_X emission rate exceeds the applicable emission limit in §60.4320. For the purposes of this subpart, a "4-hour rolling average NO_X emission rate" is the arithmetic average of the average NO_X emission rate in ppm measured by the continuous emission monitoring equipment for a given hour and the three unit operating hour average NO_X emission rates immediately preceding that unit operating hour. Calculate the rolling average if a valid NO_X emission rate is obtained for at least 3 of the 4 hours. For the purposes of this subpart, a "30-day rolling average NO_X emission rate" is the arithmetic average of all hourly NO_X emission data in ppm measured by the continuous emission monitoring equipment for a given day and the twenty-nine unit operating days immediately preceding that unit operating day. A new 30-day average is calculated each unit operating day as the average of all hourly NO_X emissions rates for the preceding 30 unit operating days if a valid NO_X emission rate is obtained for at least 75 percent of all operating hours.

ii. A period of monitor downtime is any unit operating hour in which the data for any of the following parameters are either missing or invalid: NO_X concentration, CO_2 or O_2concentration, fuel flow rate, steam flow rate, steam temperature, steam pressure, or megawatts. The steam flow rate, steam temperature, and steam pressure are only required if you will use this information for compliance purposes.

k. § 60.4395 When must I submit my reports?

All reports required under §60.7(c) must be postmarked by the 30th day following the end of each 6-month period.

l. § 60.4405 How do I perform the initial performance test if I have chosen to install a NO_X-diluent CEMS?

Then the initial performance test required under §60.8 may be performed in the following alternative manner:

i. Perform a minimum of nine RATA reference method runs, with a minimum time per run of 21 minutes, at a single load level, within plus or minus 25 percent of 100 percent of peak load. The ambient temperature must be greater than 0 °F during the RATA runs.

ii. For each RATA run, concurrently measure the heat input to the unit using a fuel flow meter (or flow meters) and measure the electrical and thermal output from the unit.

iii. Use the test data both to demonstrate compliance with the applicable NO_X emission limit under §60.4320 and to provide the required reference method data for the RATA of the CEMS described under §60.4335.

iv. Compliance with the applicable emission limit in §60.4320 is achieved if the arithmetic average of all of the NO_X emission rates for the RATA runs, expressed in units of ppm or lb/MWh, does not exceed the emission limit.

m. Each continuous NOx monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6. At least 45 days before commencing certification testing of the continuous NOx monitoring system(s), the permittee shall develop and maintain a written quality assurance/quality control plan designed to ensure continuous valid and representative readings of NOx emissions from the continuous monitor(s), in units of the applicable standard(s). The fuel flow monitor/meter shall be maintained as required in Part 75, Appendix D. Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous NO_x monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous NO_x monitoring system in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

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

n. The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

o. Each continuous carbon monoxide (CO) monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 4 or 4a and 6. At least 45 days before commencing certification testing of the continuous CO monitoring system(s), the permittee shall develop and maintain a written quality assurance/quality control plan designed to ensure continuous valid and representative readings of CO emissions from the continuous monitor(s), in units of the applicable standard(s). The fuel flow monitor/meter shall be maintained as required in Part 75, Appendix D. Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous CO monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous CO monitoring system in accordance with the frequencies required for monitoring systems subject to 40 CFR 60, or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; however, the quarterly cylinder gas audit and relative accuracy audit frequency requirements may be adjusted to coincide with linearity checks completed for continuous emissions monitoring systems subject to 40 CFR Part 75, Appendix B requirements.

p. The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit. The maximum sulfur content of the natural gas shall not exceed 2.0 grains per 100 standard cubic feet.

(2) Startup and shutdown shall be defined as when the unit is running with combustors fired at less than 25% of electric load. Startups and shutdown shall be limited to 500 cycles (one startup and one shutdown) per unit per year. (average of all six units). Each startup and shutdown shall be limited to the following:

Pollutant	lbs startup	lbs shutdown
NOx	3.35	1.68
CO	1.36	0.68

d) Monitoring and/or Recordkeeping Requirements

(1) The federally enforceable permit-to-install and operate (FEPTIO) application for this/these emissions unit(s) P001 – P006, and F001 was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust

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

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

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

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

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

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

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

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

   Toxic Contaminant: formaldehyde

   TLV (mg/m3): Maximum Hourly Emission Rate (lbs/hr): 2.51

   Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4.8

   MAGLC (ug/m3): 6.5

Toxic Contaminant: sulfuric acid mist

TLV (mg/m3): 1000

Maximum Hourly Emission Rate (lbs/hr): 2.12

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 4.1

MAGLC (ug/m3): 23.8

Toxic Contaminant: ammonia

TLV (mg/m3): 17,413

Maximum Hourly Emission Rate (lbs/hr): 60.0

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 115.8

MAGLC (ug/m3): 408

The permittee, has demonstrated that emissions of formaldehyde, sulfuric acid mist, and ammonia, from emissions unit(s) P001 – P006, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the AToxic Air Contaminant Statute@, ORC 3704.03(F).

(2) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration@, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:

a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and

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

If the permittee determines that the AToxic Air Contaminant Statute@ will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or

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

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

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

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

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

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

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

(5) The permittee shall maintain daily records of the following information:

a. the operating hours for each day; and

b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling,12-month summation of the combined operating hours (P001 – P006).

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative combined operating hours (P001 – P006) for each calendar month.

(6) The permittee shall maintain monthly records of the natural gas usage rate, in standard cubic feet.

(7) The permittee shall monitor the sulfur content and gross caloric value of the fuel being fired in the combustion turbine. Fuel sampling and analysis shall be conducted according to the procedures and at the frequency specified by 40 CFR Part 75, Appendix F.

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

a. Number of startups, and the duration of each startup.

b. Number of shutdowns, and the duration of each shutdown.

(9) Prior to the installation of the continuous NO_x monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2. The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous NO_x monitoring system meets the requirements of Performance Specification 2 and the accuracy requirements of Performance Specification 6.

Following installation, the permittee shall document that the fuel flow monitor/meter meets 40 CFR 75 certification requirements prior to the performance specification test, and shall demonstrate how the pound per hour emissions of NO_x is being calculated stoichiometrically. The U.S. EPA shall certify that the continuous NO_x monitoring system meets the requirements under 40 CFR Part 75, which may be approved through the recommendation for certification by Ohio EPA to U.S. EPA. Once received, the letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be maintain on-site and made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

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

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

The permittee shall maintain records of data obtained by the continuous NO_x monitoring system including, but not limited to:

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

b. emissions of NO_x in pounds per 3-hour average and in all units of the applicable standard(s) in the appropriate averaging period;

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

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

e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);

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

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

h. h. malfunction of the control equipment and/or the continuous NO_x monitoring system; as well as,

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

(11) The permittee may operate and maintain equipment to continuously monitor and record the fuel flow rate in order to stoichiometrically calculate emissions of NO_x, in pounds per hour, as an alternative to conducting Specification 6. Fuel heat content values for each fuel burned, as applied in the stoichiometric calculations, shall also be recorded. The permittee shall maintain records of data obtained by the fuel flow monitor/meter, including the dates and results of each calibration check and the magnitude of calibration adjustments; periods of downtime and malfunction of the fuel flow monitor/meter; as well as, the reason (if known) and the corrective actions taken (if any) for each such event.

(12) Prior to the installation of the continuous carbon monoxide (CO) monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 4 or 4a (as appropriate). The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous CO monitoring system meets the requirements of Performance Specification 4 or 4a and the accuracy requirements of Performance Specification 6.

Following installation, the permittee shall document that the fuel flow monitor/meter meets 40 CFR 75 certification requirements prior to the performance specification test, and shall demonstrate how the pound per hour emissions of CO is being calculated stoichiometrically. Once received, the letter(s)/document(s) of certification shall be maintained on-site and shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

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

(13) The permittee shall operate and maintain equipment to continuously monitor and record CO emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Parts 60.

The permittee shall maintain records of data obtained by the continuous CO monitoring system including, but not limited to:

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

b. emissions of CO in pounds per 3-hour average and in all units of the applicable standard(s) in the appropriate averaging period;

c. results of quarterly cylinder gas audits;

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

e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);

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

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

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

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

(14) The permittee may operate and maintain equipment to continuously monitor and record the fuel flow rate in order to stoichiometrically calculate emissions of CO in pounds per hour, as an alternative to conducting Specification 6. Fuel heat content values for each fuel burned, as applied in the stoichiometric calculations, shall also be recorded. The permittee shall maintain records of data obtained by the fuel flow monitor/meter, including the dates and results of each calibration check and the magnitude of calibration adjustments; periods of downtime and malfunction of the fuel flow monitor/meter; as well as, the reason (if known) and the corrective actions taken (if any) for each such event.

e) Reporting Requirements

(1) The permittee shall submit annual reports to the appropriate Ohio EPA District Office or local air agency, documenting any changes made to a parameter or value used in the dispersion model, that was used to demonstrate compliance with the AToxic Air Contaminant Statute@, ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. If no changes to the emissions unit(s) or the exhaust stack have been made, then the report shall include a statement to this effect. This report shall be postmarked or delivered no later than January 31 following the end of each calendar year.

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

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, record keeping and/or testing requirements in this permit:

all exceedances of the rolling, 12-month limitation on the combined hours of operation (P001 – P006); and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative combined hours of operation (P001 – P006).

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 (postmarked) each year by the thirty-first of January (covering October to December), the thirtieth of April (covering January to March), the thirty-first of July (covering April to June), and the thirty-first of October (covering July to September), unless an alternative schedule has been established and approved by the director (the appropriate district office or local air agency).

(3) Annual Permit Evaluation Report (PER) forms will be mailed to the permittee at the end of the reporting period specified in the Authorization section of this permit. The permittee shall submit the PER in the form and manner provided by the director by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve-months for each air contaminant source identified in this permit.

(4) This emissions unit is subject to the applicable provisions of Subpart KKKK of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Pursuant to 40 CFR Part 60.7, the permittee is hereby advised of the requirement to report the following at the appropriate times:

a. construction date (no later than 30 days after such date);

b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);

c. actual start-up date (within 15 days after such date); and,

d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P. O. Box 163669
Columbus, Ohio 43216-3669

and

Akron RAQMD
Room 904
146 S. High Street
Akron, OH 44308

(5) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NO_x monitoring system:

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

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

i. the facility name and address;

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

(6) If using the fuel flow rate to stoichiometrically calculate the pound per hour emissions of NO_x, in place of Specification 6 requirements, the permittee shall submit quarterly reports, to the appropriate Ohio EPA District Office or local air agency, that document the date, time, and duration of each malfunction and/or period of downtime of the continuous fuel flow monitoring system, while the emissions unit was in operation, and the reason (if known) and the corrective actions taken (if any) for each such event. If there was no downtime or malfunction of the continuous fuel flow monitoring system during any calendar quarter, the report shall be submitted so stating it. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year.

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

(8) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous CO monitoring system:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of CO emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapter 3745-21, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).

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

i. the facility name and address;

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

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

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

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

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

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

viii. results and dates of quarterly cylinder gas audits;

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

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

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

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

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

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

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

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

(9) If using the fuel flow rate to stoichiometrically calculate the pound per hour emissions of CO, in place of Specification 6 requirements, the permittee shall submit quarterly reports, to the appropriate Ohio EPA District Office or local air agency, that document the date, time, and duration of each malfunction and/or period of downtime of the continuous fuel flow monitoring system, while the emissions unit was in operation, and the reason (if known) and the corrective actions taken (if any) for each such event. If there was no downtime or malfunction of the continuous fuel flow monitoring system during any calendar quarter, the report shall be submitted so stating it. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year.

f) Testing Requirements

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

a. Emission Limitation

Nitrogen oxides (NOx) emissions shall not exceed 3.0 ppmvd at 15% oxygen and 7.18 lbs/hr.

Applicable Compliance Method

Initial compliance with the allowable outlet concentration, and the lbs/hr emission limitations shall be demonstrated through emission testing performed in accordance with Methods 1-4 and Method 20 of 40 CFR Part 60, Appendix A. Compliance with the 3.0 ppmvd limit is required only when the unit operates above 25% load for the entire clock-hour of the averaging period. Testing shall be conducted per 40 CFR 60.4405.

Compliance with the above limitation will ensure compliance with the mass emission limitation listed in 40 CFR 60 Subpart KKKK.

Continuous compliance shall be based on the use of the CEM system with the data averaged over a 4-hour period.

b. Emission Limitation

Particulate emissions (PE) shall not exceed 0.0066 lb/MMbtu and 3.89 lbs/hr.

Applicable Compliance Method

Initial compliance with the allowable outlet concentration, and the lbs/hr emission limitations shall be demonstrated through emission testing performed in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

c. Emission Limitation

Sulfur dioxide (SO2) emissions shall not exceed 0.006 lb/MMbtu and 3.53 lbs/hr.

Applicable Compliance Method

Initial compliance with the allowable outlet concentration, and the lbs/hr emission limitations shall be demonstrated through the sulfer content of the natural gas data obtained from the natural gas supplier.

d. Emission Limitation

Carbon monoxide (CO) emissions shall not exceed 5.0 ppmvd at 15% oxygen and 7.28 lbs/hr.

Applicable Compliance Method

Initial compliance with the allowable outlet concentration, and the lbs/hr emission limitations shall be demonstrated through emission testing performed in accordance with Methods 1-4 and Method 10 of 40 CFR Part 60, Appendix A. Compliance with the 5.0 ppmvd limit is required only when the unit operates above 25% load for the entire clock-hour of the averaging period.

Continuous compliance shall be based on the use of the CEM system with the data averaged over a 4-hour period.

e. Emission Limitation

Volatile organic compounds (VOC) emissions shall not exceed 2.2 lbs/hr.

Applicable Compliance Method

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1-4 and Method 25 of 40 CFR Part 60, Appendix A.

f. Emission Limitation

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

Applicable Compliance Method

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

g. Emission Limitation

SO2 emissions shall not exceed 110 nanograms ng/J (0.90 lb/MWh) gross output, or
26 ng/J (0.060 lb/MMBtu) heat input

Applicable Compliance Method

Compliance with the emission limitation shall be demonstrated by the methods outlined in sections b.2.e – b.2.p.

h. Emission Limitation

The tons per rolling 12-month period for emissions units P001 – P006 combined (including startups/shutdowns) shall not exceed:

NOx – 93.67
CO – 90.36
VOC – 26.40
PE – 46.65
SO2 – 42.41

Applicable Compliance Method

Annual Emissions (tpy) =(Hours of operation * lbs/hr limitation + ∑ Start)/ 2000

Where:
Start = pounds of emissions allocated to each star-up/shutdown cycle

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

a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the mass emissions limitations for NOx, PE, and CO.

c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

NOx – Method 20 of 40 CFR Part 60, Appendix A;

PE - Method 5 of 40 CFR Part 60, Appendix A; and

CO- Method 10 of 40 CFR Part 60, Appendix A.

d. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

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

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

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

(3) Within 60 days of the effective date of this permit, the permittee shall conduct certification tests of the continuous NO_x monitoring system, in units of the applicable standard(s), to demonstrate compliance with 40 CFR Part 60, Appendix B, Performance Specification 2; Performance Specification 6 relative accuracy requirements; ORC section 3704.03(I); and 40 CFR Part 75.

The permittee shall certify that the fuel flow monitor/meter meets 40 CFR 75 certification requirements prior to the performance specification test and shall demonstrate how the pound per hour emissions of NO_x will be calculated stoichiometrically from the fuel flow rate.

Personnel from the Ohio EPA Central Office and the appropriate Ohio EPA District Office or local air agency shall be notified 45 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the appropriate Ohio EPA District Office or local air agency and one copy to Ohio EPA Central Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification, or recommendation for certification by Ohio EPA to U.S. EPA, of the continuous NO_x monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets the requirements of 40 CFR Part 60,

Appendix B, Performance Specification 2; Performance Specification 6 relative accuracy requirements; ORC section 3704.03(I); and 40 CFR Part 75.

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

(4) Within 60 days of the effective date of this permit, the permittee shall conduct certification tests of the continuous CO monitoring system in units of the applicable standard(s), to demonstrate compliance with 40 CFR Part 60, Appendix B, Performance Specification 4 or 4a (as appropriate); Performance Specification 6 relative accuracy requirements; and ORC section 3704.03(I).

The permittee shall certify that the fuel flow monitor/meter is calibrated prior to the performance specification test and shall demonstrate how the pound per hour emissions of CO will be calculated stoichiometrically from the fuel flow rate.

Personnel from the Ohio EPA Central Office and the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the appropriate Ohio EPA District Office or local air agency and one copy to Ohio EPA Central Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification of the continuous CO monitoring system shall be granted upon determination by the Ohio EPA Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 4 or 4a (as appropriate); Performance Specification 6 relative accuracy requirements; and ORC section 3704.03(I).

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

g) Miscellaneous Requirements

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