



State of Ohio Environmental Protection Agency

STREET ADDRESS:

Lazarus Government Center
50 W. Town St., Suite 700
Columbus, Ohio 43215

TELE: (614) 644-3020 FAX: (614) 644-3184
www.epa.state.oh.us

MAILING ADDRESS:

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

1/8/2009

William Shew
GREIF PAPER, PACKAGING & SERVICES LLC
PO Box 675
Massillon, OH 44646

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 1576000431
Permit Number: P0100950
Permit Type: Renewal
County: Stark

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR
No	CEMS
No	MACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED

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, The Canton Repository. 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 Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544

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 Canton City Health Department at (330)489-3385.

Sincerely,

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

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

**FEPTIO STRATEGY FOR LIMITING NO_x PTE
FOR A
COMBINED CYCLE NATURAL GAS-FIRED COMBINED CYCLE GAS TURBINE WITH A
SUPPLEMENTAL DUCT BURNER AND STEAM GENERATOR**

**LOCATED IN STARK COUNTY AT
GREIF PAPER. PACKAGING & SERVICES LLC**

**EPA PREMISE NO. 15 76 00 0431
FEPTIO P0100950**

A. Source Description

Greif Paper, Packaging & Services LLC operates a plant which manufactures cardboard from recycled cardboard in Stark County. The permitted air emissions units are the gas turbine (P003) and the duct burner (P008) installed in 1997 under PTI 15-01449 as a Synthetic Minor source.

B. Facility Emissions and Attainment Status

The facility emissions are from P003 and P008 and potentially from three stand-by boilers P005, P006 and P007 under separate permit. Facility PTE exceeds 100 TPY for NO_x. The company has agreed to limit its operation of the standby boilers by not operating them while P003 and P008 are operating. This reduces their PTE for NO_x emissions to 81 TPY

This permit action is a first issue FEPTIO from a SM PTI and is not for a modification or installation of a new source. Therefore, the NAAQS attainment status of Stark County is not relevant for the approval and issuance of this permit. Stark County is in attainment for NO_x and ozone.

C. Source Emissions

Greif Paper has agreed to limit NO_x generation to 81 TPY by not operating B005, B006 and B007 while operating P003 and P008 and making these operating limits federally enforceable.

D. Conclusion

The facility has been in compliance with the terms and conditions of their existing SM PTI and Canton LAA recommends approving and issuing a FEPTIO with the federally enforceable operating limits.

9/23/08 DM Augenstein

PUBLIC NOTICE
Issuance of Draft Air Pollution Permit-To-Install and Operate
GREIF PAPER, PACKAGING & SERVICES LLC

Issue Date: 1/6/2009
Permit Number: P0100950
Permit Type: Renewal
Permit Description: FEPTIO for a gas turbine with a supplemental duct burner and steam generator.
Facility ID: 1576000431
Facility Location: GREIF PAPER, PACKAGING & SERVICES LLC
9420 WARMINGTON RD, S.W.,
MASSILLON, OH 44646
Facility Description: Paper (except Newsprint) Mills

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 Dave Augenstein at Canton City Health Department, 420 Market Avenue or (330)489-3385 . The permit can be downloaded from the Web page: www.epa.state.oh.us/dapc



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

DRAFT

**Air Pollution Permit-to-Install and Operate
for
GREIF PAPER, PACKAGING & SERVICES LLC**

Facility ID: 1576000431
Permit Number: P0100950
Permit Type: Renewal
Issued: 1/8/2009
Effective: To be entered upon final issuance
Expiration: To be entered upon final issuance



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install and Operate
for
GREIF PAPER, PACKAGING & SERVICES LLC

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State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0100950

Facility ID: 1576000431

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 1576000431
Application Number(s): A0032704
Permit Number: P0100950
Permit Description: FEPTIO for a gas turbine with a supplemental duct burner and steam generator.
Permit Type: Renewal
Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*
Issue Date: 1/8/2009
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:

GREIF PAPER, PACKAGING & SERVICES LLC
9420 WARMINGTON RD, S.W.
MASSILLON, OH 44646

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:

Canton City Health Department
420 Market Avenue
Canton, OH 44702-1544
(330)489-3385

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



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0100950

Facility ID: 1576000431

Effective Date: To be entered upon final issuance

Authorization (continued)

Permit Number: P0100950

Permit Description: FEPTIO for a gas turbine with a supplemental duct burner and steam generator.

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

Emissions Unit ID:	B008
Company Equipment ID:	Duct Burner
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P003
Company Equipment ID:	Gas Turbine
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0100950

Facility ID: 1576000431

Effective Date: To be entered upon final issuance

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 Canton City Health Department 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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0100950

Facility ID: 1576000431

Effective Date: To be entered upon final issuance

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0100950

Facility ID: 1576000431

Effective Date: To be entered upon final issuance

B. Facility-Wide Terms and Conditions



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0100950

Facility ID: 1576000431

Effective Date: To be entered upon final issuance

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.



State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Draft Permit-to-Install and Operate

Permit Number: P0100950

Facility ID: 1576000431

Effective Date: To be entered upon final issuance

C. Emissions Unit Terms and Conditions



1. B008, Duct Burner

Operations, Property and/or Equipment Description:

82.5 MMBTU/hr (87.0 gigajoules/hr), natural gas fired, supplemental duct burner and steam generator, which constitutes a steam generating unit. B008 is the rear part of a combined cycle steam generating system. The exhaust from the supplemental duct burner feeds the steam generator and exits from the steam generator stack

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. Sections d) (2), e)(2) and e)(6)

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) (PTI 15-01449)	Carbon monoxide (CO) shall not exceed 6.92 lbs/hr and 30.35 tons/yr. Nitrogen oxides (NOx) shall not exceed 6.27 lbs/hr and 27.46 tons/yr. Volatile organic compounds (VOC) shall not exceed 0.454 lb/hr and 1.99 tons/yr. Natural gas shall be the only fuel utilized to fire the duct burner. See Additional Terms and Conditions, Section c)
b.	OAC rule 3745-31-05(D) (Synthetic Minor with federally enforceable	Synthetic Minor Limits



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	restrictions added to avoid Title V)	See Operational Restriction d) (2).
c.	OAC rule 3745-17-07(A)(1)	The opacity of emissions from the steam generator stack shall not exceed 20%, as a 6-minute average, except for 6 consecutive minutes in any hour when opacities up to 60%, as a 6-minute average, are permitted.
d.	OAC rule 3745-17-10	0.020 lb PM per MMBTU actual heat input

2) Additional Terms and Conditions

(a) Additional OAC rule 3745-31-05(A)(3) requirements:

- i. Natural gas shall be the only fuel utilized to fire the turbine; and
- ii. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-10, 3745-17-07(A)(1) and 3745-17-11(B)(4) and compliance with the requirements of 40 CFR Part 60, Subpart GG.

c) Operational Restrictions

- (1) The control equipment, including the pilot scanner assembly that provides low NOx capability for the duct burner, shall be operated at all times that the duct burner is operated.
- (2) This facility shall not operate emissions units B005, B006, and B007 when emissions unit P003 is operating separately or in combination with B008.

d) Monitoring and/or Record Keeping Requirements

- (1) This facility shall maintain written records of any and all malfunctions of emissions units P003 and B008 in which there is an emission of air contaminants in violation of the mass emission limitations in this permit. The records shall contain the items listed in OAC rule 3745-15-06 (B)(1)(a) through (c). This record keeping requirement is in addition to the requirements in OAC rule 3745-15-06.
- (2) This facility shall maintain daily written records of which emissions units of B005, B006, B007, P003, B008, and combined P003 and B008 were operated and a record of a statement as to whether emissions unit P003, separately or in combination with B008, was operated simultaneously with emissions unit B005, B006, or B007.
- (3) All records required shall be maintained in a bound logbook and retained on file for a period of not less than five years unless otherwise indicated by Ohio Environmental Protection Agency. All records shall be made available to the Director, or any authorized representative of the Director, for review at the facility during normal business hours.
- (4) This facility shall operate the portable gas monitor required in (6) according to its operations manual. Records of any quality assurance or quality control work performed



on the portable gas monitor and any maintenance work performed on the portable gas monitor shall be maintained in a bound logbook.

(5) NSPS Requirements

- (a) This facility shall record and maintain records of the amount of fuel consumed in this emissions unit each day.
- (b) This facility shall properly install, maintain, and operate a separate natural gas flow rate meter for this emissions unit.

- (6) This facility shall monitor the exhaust gases from the steam generator which is part of emissions unit B008 with a portable gas monitor or other approved analyzer for the concentrations of NO_x and CO. Emissions unit P003 shall also be in operation during this monitoring. This facility shall also monitor the temperature and velocity of these exhaust gases using a thermocouple and pitot tube. This facility shall monitor the exhaust gases from the stationary gas turbine, emissions unit P003, with a portable gas monitor or other approved analyzer for the percentage of the stoichiometric amount of O₂. All of these monitoring requirements shall be performed at least one time per calendar month. The mass emission rate in the exhaust gases from the steam generator in pounds per hour of NO_x and CO shall be calculated from the measured concentrations, the percentage of the stoichiometric amount of O₂, temperature, and pitot pressure drop.

e) Reporting Requirements

- (1) This facility shall submit written reports to the Canton City Health Department, Air Pollution Control Division. These reports shall be submitted by January 31 of the current year and shall cover the previous calendar year. The report is in addition to the requirements in OAC rule 3745-15-06. The annual report shall include:
- (a) all of the malfunctions and the items listed in OAC rule 3745-15-06 (B)(1)(a) through (c) required to be recorded in Emissions Unit Term and Condition e) (1);
 - (b) the calculated mass emission rates in pounds per hour of NO_x and CO in the exhaust gases from the steam generator, which is part of emissions unit B008, determined from all of the portable gas analyzer measurements required in Emissions Unit Term and Condition e) (6). and a table of all the values used in these calculations. Also, a sample calculation of these mass emission rates, including the general equations used, shall be included in this annual report; and
 - (c) a statement as to whether emissions unit P003 separately or in combination with B008 was operated simultaneously with emissions unit B005, B006, or B007 on any day, and, a listing of such days, if any.
 - (d) The permittee shall submit quarterly deviation (excursion) reports that identify:
 - (i) 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: "This facility shall not operate



emissions units B005, B006, and B007 when emissions unit P003 is operating separately or in combination with B008.”

- (ii) the probable cause of each deviation (excursion);
- (iii) any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- (iv) 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).

- (2) This facility shall submit written reports to Canton City Health Department, Air Pollution Control Division whenever a calculated mass emission rate in pounds per hour of NOx or CO required to be recorded in Emissions Unit Term and Condition e) (6) (from the portable monitor measurements) exceeds 22.7 pounds per hour or 12.1 pounds per hour, respectively. These reports shall be submitted within fourteen days of the day when the measurements were made with the portable analyzer.
- (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.

f) Testing Requirements

- (1) At the request of the Canton City Health Department, Air Pollution Control Division, emissions testing may be required in accordance with this section. Compliance with the emission limitation(s) in the Air Emission Summary and in the Additional Terms and Conditions shall be determined in accordance with the following method(s):

a. Emission Limitation

Carbon monoxide (CO) shall not exceed 6.92 lbs/hr.

Applicable Compliance Method

Emission testing per 40 CFR Part 60, Appendix A, Method 10 or 10B.



b. Emission Limitation

Carbon monoxide (CO) shall not exceed 30.35 tons/yr.

Applicable Compliance Method

Divide the hourly CO emission rate in pounds of CO emitted per hour determined in the emission testing by the cubic feet of natural gas used during the test hour, multiply by the actual annual natural gas usage rate in units of millions of cubic feet per year and then divide by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

c. Emission Limitation

Volatile organic compounds (VOC) shall not exceed 0.454 lb/hr.

Applicable Compliance Method

Compliance shall be determined by calculation. The emission factor from FIRE 6.23 for SCC 1-02-006-02 is 5.5 pounds of VOC emitted per million standard cubic feet of natural gas burned. VOC emissions in pounds per hour are equal to 5.5 lbs VOC/MM SCF times 1 SCF/1000 BTU times 82.5 MM BTU/hr, which equals 0.454 lbs/hr VOC.

d. Emission Limitation

Volatile organic compounds (VOC) shall not exceed 1.99 tons/yr.

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual operating hours and then dividing by 2,000 lbs/ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

e. Emission Limitation

Nitrogen oxides (NO_x) shall not exceed 6.27 lbs/hr.

Applicable Compliance Method

Emission testing per 40 CFR Part 60, Appendix A, Method 7, 7A, 7B, 7C, 7D, or 7E.

f. Emission Limitation

Nitrogen oxides (NO_x) shall not exceed 27.46 tons/yr.

Applicable Compliance Method

Compliance shall be demonstrated by multiplying the allowable hourly emission limitation by the actual annual operating hours and then dividing by 2,000 lbs/ton.



Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

g. Emission Limitation

The opacity of emissions from the steam generator stack shall not exceed 20%, as a 6-minute average, except for 6 consecutive minutes in any hour when opacities up to 60%, as a 6-minute average, are permitted.

Applicable Compliance Method

Method 9 as per OAC rule 3745-17-03 (B)(1).

h. Emission Limitation

0.020 lb PM per MMBTU actual heat

Applicable Compliance Method

AP-42, Table 1.4-2 dated 7/98 lists the PM (filterable) emission factor for natural gas combustion sources as 1.9 lbs/MM scf fuel input. Multiplying this emission factor by 1 scf per 1,000 BTU for natural gas gives an emission factor of 0.0019 lb/MM BTU. Because 0.0019 lb PM per MM BTU actual heat input is less than 0.020 lb PM per MM BTU actual heat input, compliance with this limit is shown.

(2) Emission Testing Requirements

Intent to Test Requirements for Nitrogen Oxides and Carbon Monoxide Emissions for emissions units P003 and B008

- a. Not later than 30 days prior to the proposed test date(s), this facility shall submit a written "Intent to Test" notification for each emissions unit to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue, North, Canton, Ohio 44702-1544, phone (330) 489-3385, fax (330) 489-3335.
- b. Failure to submit such notification for review and approval prior to the test(s) may result in the Canton City Health Department's refusal to accept the results of the emission test(s).
- c. The "Intent to Test" notification shall include but not be limited to the following facility proposed items:
 - i. describe in detail the test methods and procedures;
 - ii. the emissions units' operating parameters;
 - iii. the time(s) and date(s) of the test(s);
 - iv. the person(s) who will be conducting the test(s);
 - v. a listing of the emissions unit's numbers with an identification of which operation, process, or activity corresponds to each emissions unit number



for all operations, processes, or activities that could vent exhaust gases to the test stack;

- vi. a listing of which operation, process, or activity of all operations, processes, or activities that could vent exhaust gases to the test stack which are not included in an Ohio EPA air permit;
- vii. a simple, non-dimensional sketch showing the ducting and stack arrangement including the relative position of all operations, processes, or activities that could vent exhaust gases to the test stack; and
- viii. a statement as to whether there are any other emissions, i.e. emissions not being emitted from the test stack but being emitted into the air at other location(s) besides the test stack, for each operation, process or activity that could vent exhaust gases to the test stack.

(3) Emission testing requirements for emissions units P003 and B008:

- a. During all runs of the emissions tests, the portable gas monitor and the associated temperature measurement device(s) and pitot tubes shall be operated and the items required to be recorded in Emissions Unit Term and Condition e) (6) of emissions unit B008 shall be measured and recorded.
- b. Personnel from the Canton City Health Department, APCD 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.
- c. A comprehensive written report on the results of the emission(s) test(s) shall be signed by the person or persons responsible for the tests and submitted to the Canton City Health Department, APCD within 30 days following completion of the test(s). This report shall also include the information required to be recorded in h) (1) c. above.

(4) Emission testing requirement for emissions unit B008 operating in combination with emissions unit P003:

- a. the permit allowable mass emissions for the operation of emissions unit B008 in combination with emissions unit P003, the combined cycle steam generating system, is equal to the sum of the permit allowable mass emissions for emissions units P003 and B008. These permit allowable mass emissions are: 12.1 lbs/hr CO, 53.04 TPY CO, 0.454 lbs/hr VOC, 1.99 TPY VOC, 22.7 lbs/hr NO_x, and 99.29 TPY NO_x.
- b. The emission testing shall be conducted within 3 months after a written request of Canton City Health Department, Air Pollution Control Division.
- c. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for Nitrogen Oxides (NO_x) and Carbon Monoxide (CO).



- d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: For NO_x, Method 7, 7A, 7B, 7C, 7D, or 7E of 40 CFR Part 60, Appendix A; for CO, Method 10 or 10B of 40 CFR Part 60, Appendix A.
- e. The heat input (HHV) to the duct burner shall be determined for each test run.
- f. The heat input (HHV) to the turbine shall be determined for each test run.

g) Miscellaneous Requirements

(1) NSPS Requirements

- a. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.
- b. Emissions unit P003 is subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60 and including 40 CFR Part 60 Subpart GG Standards of Performance for Stationary Gas Turbines, except as clarified as follows:
 - i. Emissions unit B008 shall not be subject to 60.42c; 60.43c; 60.44c; 60.45c; 60.46c; 60.47c; 60.48c (a)(2), (3), and (4); and 60.48c (b), (c), (d), (e), (f), and (h)

- (2) By request of the applicant and pursuant to OAC rule 3745-31-05(D), emissions unit term and condition e) (6) of this permit for this emissions unit is a federally enforceable requirement.



2. P003, Gas Turbine

Operations, Property and/or Equipment Description:

P003 - 66.5 MMBTU/hr (70.1 gigajoules/hr.), natural gas fired stationary gas turbine. The gas turbine drives a 6.5 MW generator. P003 is also the front part of a combined cycle steam generating system. The exhaust from the stationary gas turbine feeds the supplemental duct burner or is exhausted from the bypass stack. The supplemental duct burner is part of a steam generating unit, emissions unit B008.

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. Sections d) (2), e) and h)

b) Applicable Emission 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)	Carbon monoxide (CO) shall not exceed 5.18 lbs/hr and 22.69 tons/yr. Nitrogen oxides (NOx) shall not exceed 16.4 lbs/hr and 71.83 tons/yr.
b.	OAC rule 3745-31-05(D) (PTI 15-01449- Synthetic Minor with federally enforceable restrictions added to avoid Title V)	Synthetic Minor Limits See Operational Restriction d)
c.	OAC rule 3745-17-07(A)(1)	The opacity of emissions from any stack shall not exceed 20%, as a 6-minute average, except for 6 consecutive minutes in any hour when



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		opacities up to 60%, as a 6-minute average, are permitted.
d.	OAC rule 3745-17-11(B)(4)	Less than 0.040 lb PM per MMBTU actual heat input.
e.	OAC rule 3745-18-06(F)	The requirements of this rule are less stringent than the 40 CFR Part 60, Subpart GG requirements.
f.	40 CFR Part 60, Subpart GG	No more than 200 PPMv NOx at 15% oxygen and dry basis from the bypass stack. No fuel which contains greater than 0.8% by weight sulfur shall be burnt in this stationary gas turbine. No more than 150 PPMv SO2 at 15% oxygen and dry basis from the bypass stack.

2) Additional Terms and Conditions

a.) Additional OAC rule 3745-31-05(A)(3) requirements:

- i. Natural gas shall be the only fuel utilized to fire the turbine; and
- ii. The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1), 3745-17-10 and 3745-17-11(B)(4) and compliance with the requirements of 40 CFR Part 60, Subpart GG.

c) Operational Restrictions

- (1) The low NOx combustor and control system shall be operated at all times that the turbine is being operated.
- (2) This facility shall not operate emissions units B005, B006, and B007 when emissions unit P003 is operating separately or in combination with B008.

d) Monitoring and/or Record Keeping Requirements

- (1) In accordance with 40 CFR 60.334, this facility shall be subject to the following custom fuel sampling schedule:



- a. monitoring of fuel nitrogen content shall not be required while natural gas is the only fuel being fired;
 - b. sulfur monitoring shall be performed according to the following custom fuel sampling schedule by either the facility, a service contractor retained by the facility, or the fuel vendor;
 - i. analysis for fuel sulfur content of the natural gas shall be conducted using the methods listed for gaseous fuels in 40 CFR 60.335
 - ii. sulfur monitoring shall be performed every six months, during the first and third quarters, and remain in compliance with 40 CFR 60.333. Sulfur content shall also be calculated and reported as sulfur dioxide.
 - iii. should any fuel sulfur analysis as required in the above paragraphs (B) and (C) indicate noncompliance with 40 CFR 60.333, this facility shall notify the City of Canton Health Department, Air Pollution Control Division, in writing of such excess emissions within fourteen days of the non-compliant analysis report. The custom fuel sampling schedule shall be re-examined. Sulfur monitoring shall be conducted weekly during the interim period when this custom fuel sampling schedule is being re-examined.
 - iv. records of analyses and fuel supply shall be retained for five years and be available for inspection at the facility by local, state and federal control agencies.
 - v. if there is a substantial change in fuel quality due to a change in the natural gas fuel supply, this facility shall notify the City of Canton Health Department, Air Pollution Control Division of such change for re-examination of this custom fuel sampling schedule. This notification shall be in written form and shall be submitted to the City of Canton Health Department, Air Pollution Control Division within fourteen days of such a change. Fuel sulfur monitoring shall be conducted weekly during the interim period when this custom fuel sampling schedule is being re-examined; and
 - vi. record of sample analysis and sampling schedule shall be retained for a period of five years and be available for inspection at the facility by personnel of the federal, state, and local air pollution control agencies.
- (2) This facility shall record and maintain records of the amounts of natural gas consumed in this emissions unit each month.
- (3) This facility shall properly install, maintain, and operate a separate natural gas flow rate meter for this emissions unit.
- (4) This facility shall maintain daily written records of which emissions units of B005, B006, B007, P003, B008, and combined P003 and B008 were operated and a record of a statement as to whether emissions unit P003, separately or in combination with B008, was operated simultaneously with emissions unit B005, B006, or B007.



- (5) This facility shall operate the portable gas monitor required in g) according to its operations manual. Records of any quality assurance or quality control work performed on the portable gas monitor, and any maintenance work performed on the portable gas monitor shall be maintained in a bound logbook.
- (6) This facility shall monitor the exhaust gases from the steam generator which is part of emissions unit B008 with a portable gas monitor or other approved analyzer for the concentrations of NO_x and CO. Emissions unit P003 shall also be in operation during this monitoring. This facility shall also monitor the temperature and velocity of these exhaust gases using a thermocouple and pitot tube. This facility shall monitor the exhaust gases from the stationary gas turbine, emissions unit P003, with a portable gas monitor or other approved analyzer for the percentage of the stoichiometric amount of O₂. All of these monitoring requirements shall be performed at least one time per calendar month. The frequency of these monitoring requirements may be adjusted at the issuance of the Permit to Operate for this emissions unit. The mass emission rate in the exhaust gases from the steam generator in pounds per hour of NO_x and CO shall be calculated from the measured concentrations, the percentage of the stoichiometric amount of O₂, temperature, and pitot pressure drop.

e) Reporting Requirements

- (1) 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: "This facility shall not operate emissions units B005, B006, and B007 when emissions unit P003 is operating separately or in combination with B008."
 - 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).

- (2) 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) At the request of the Canton City Health Department, Air Pollution Control Division, emissions testing may be required and shall be conducted in accordance with this section.

Compliance with the emission limitation(s) in the Air Emission Summary and in the Emissions Unit Terms and Conditions for this emissions unit shall be determined in accordance with the following method(s):

- a. Emission Limitation
Carbon monoxide (CO) shall not exceed 5.18 lbs/hr.

Applicable Compliance Method

Divide the hourly CO emission rate in pounds of CO emitted per hour determined in the emission testing by the cubic feet of natural gas used during the test hour, multiply by the actual annual natural gas usage rate in units of millions of cubic feet per year and then divide by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

- b. Emission Limitation
Carbon monoxide (CO) shall not exceed 22.69 tons/yr.

Applicable Compliance Method

Divide the hourly CO emission rate in pounds of CO emitted per hour determined in the emission testing by the cubic feet of natural gas used during the test hour, multiply by the actual annual natural gas usage rate in units of millions of cubic feet per year and then divide by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.

- c. Emission Limitation
Nitrogen oxides (NOx) shall not exceed 16.4 lbs/hr.

Applicable Compliance Method

Emission testing per 40 CFR, Part 60, Appendix A, Method 7, 7A, 7B, 7C, 7D, or 7E.

- d. Emission Limitation
Nitrogen oxides (NOx) shall not exceed 71.83 tons/yr.

Applicable Compliance Method

Divide the hourly NOx emission rate in pounds of NOx emitted per hour determined in the emission testing by the cubic feet of natural gas used during the test hour, multiply by the actual annual natural gas usage rate in units of millions of cubic feet per year and then divide by 2,000 pounds per ton. Therefore, provided compliance is shown with the hourly limitation, compliance shall also be shown with the annual limitation.



- e. Emission Limitation
The opacity of emissions from the bypass stack shall not exceed 20%, as a 6-minute average, except for 6 consecutive minutes in any hour when opacities up to 60%, as a 6-minute average, are permitted.

Applicable Compliance Method
Method 9 as per OAC rule 3745-17-03 (B)(1).
 - f. Emission Limitation
Less than 0.040 lb PM per MMBTU actual heat input.

Applicable Compliance Method
AP-42, Table 3.1-2a dated 4/00 lists the uncontrolled, PM (filterable) emission factor for natural gas-fired turbines as 0.0019 lb/MM Btu fuel input. Because 0.0019 lb PM per MM BTU actual heat input is less than 0.040 lb PM per MM BTU actual heat input, compliance with this limit is shown.
 - g. Emission Limitation
No more than 200 PPMv NOx at 15% oxygen and dry basis from the bypass stack.

Applicable Compliance Method
Emissions testing per 40 CFR Part 60.335 (b), 60.335 (c), and 60.335 (f).
 - h. Emission Limitation
No fuel which contains greater than 0.8% by weight sulfur shall be burnt in this stationary gas turbine.

Applicable Compliance Method
Monitor the sulfur content of the fuel using a method listed in 40 CFR Part 60.335 (d) following the custom fuel sampling schedule in Emissions Unit Term and Condition f) (1)
 - i. Emission Limitation
No more than 150 PPMv SO2 at 15% oxygen and dry basis from the bypass stack.

Applicable Compliance Method
Compliance was demonstrated with emissions testing in September, 1997 and continuing compliance shall be demonstrated with the custom fuel sampling schedule in Emissions Unit Term and Condition f) (1)
- (2) Intent to Test Requirements for Nitrogen Oxides and Carbon Monoxide emissions for emissions units P003 and B008:
- a. Not later than 30 days prior to the proposed test date(s), this facility shall submit a written "Intent to Test" notification for each emissions unit to the Canton City Health Department, Air Pollution Control Division, 420 Market Avenue, North, Canton, Ohio 44702-1544, phone (330) 489-3385, fax (330) 489-3335.



Failure to submit such notification for review and approval prior to the test(s) may result in the Canton City Health Department's refusal to accept the results of the emission test(s).

- b. The "Intent to Test" notification shall include, but not be limited to, the following facility proposed items:
 - i. describe in detail the test methods and procedures;
 - ii. the emissions units' operating parameters;
 - iii. the time(s) and date(s) of the test(s);
 - iv. the person(s) who will be conducting the test(s);
 - v. a listing of the emissions unit numbers with an identification of which operation, process, or activity corresponds to each emissions unit number for all operations, processes, or activities that could vent exhaust gases to the test stack;
 - vi. a listing of which operation, process, or activity of all operations, processes, or activities that could vent exhaust gases to the test stack which are not included in an Ohio EPA air permit;
 - vii. a simple, non-dimensional sketch showing the ducting and stack arrangement including the relative position of all operations, processes, or activities that could vent exhaust gases to the test stack; and
 - viii. a statement as to whether there are any other emissions, i.e. emissions not being emitted from the test stack but being emitted into the air at other location(s) besides the test stack, for each operation, process or activity that could vent exhaust gases to the test stack.

(3) Emission testing requirement for emissions units P003 and B008:

- a. During all runs of the emissions tests, the portable gas monitor and the associated temperature measurement device(s) and pitot tubes shall be operated.
- b. Personnel from the Canton City Health Department, APCD 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.
- c. A comprehensive written report on the results of the emission(s) test(s) shall be signed by the person or persons responsible for the tests and submitted to the Canton City Health Department, APCD within 30 days following completion of the test(s).



- (4) Emission testing requirement for emissions unit P003:
 - a. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate for Nitrogen Oxides (NO_x), and Carbon Monoxide (CO), and with the allowable emission concentration for Nitrogen Oxides (NO_x).
 - b. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rates: For NO_x, Methods 7, 7A, 7B, 7C, 7D, or 7E of 40 CFR Part 60, Appendix A; for CO, Method 10 or 10B of 40 CFR Part 60, Appendix A.
 - c. The test method which shall be employed to demonstrate compliance with the allowable emission concentrations for NO_x are the test methods and procedures in 40 CFR Parts 60.335 (b), 60.335 (c), or 60.335 (f).
 - d. Four test runs shall be performed at 30, 50, 75, and 100% of the peak load, or at four points in the normal operating range of the turbine (including the minimum and peak load) to demonstrate compliance with the allowable emission concentration for NO_x.

g) Miscellaneous Requirements

(1) NSPS Requirements

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.

Emissions unit P003 is subject to the applicable provisions of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60 and including 40 CFR Part 60 Subpart GG Standards of Performance for Stationary Gas Turbines, except as clarified as follows:

- (2) Emissions unit P003 shall not be subject to the following 40 CFR NSPS requirements:
 - a. 60.334 (b), for NO_x
 - b. 60.334 (c)(1), (3) & (4)
- (3) By request of the applicant and pursuant to OAC rule 3745-31-05, Emissions Unit Term and Condition d) (2) of this permit for this emissions unit is a federally enforceable requirement.