



State of Ohio Environmental Protection Agency

STREET ADDRESS:

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Columbus, Ohio 43215

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

9/22/2009

Certified Mail

No	TOXIC REVIEW
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No	MODELING SUBMITTED

Mr. Shawn Coffey  
City of Lebanon  
Electric Administration Building  
125 SOUTH SYCAMORE ST  
Lebanon, OH 45036

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE  
Facility ID: 1483060000  
Permit Number: P0100563  
Permit Type: Renewal  
County: Warren

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 Western Star. 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 Hamilton County Dept. of Environmental Services  
250 William Howard Taft Pkwy.  
Cincinnati, OH 45219-2660

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 Hamilton County Dept. of Environmental Services at (513)946-7777.

Sincerely,

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*  
HCDOES; Indiana; Kentucky





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

This FEPTIO is for a 12,500 KW GE combustion turbine firing exclusively diesel fuel located at the City of Lebanon. The combustion turbine is used to generate electricity during times of peaking demand and/or emergency situations.

3. Facility Emissions and Attainment Status:

The facility is located in Warren County which is currently non-attainment for 8-hour ozone standard (VOC and NOx), non-attainment for particulate matter 2.5 microns and less in diameter (PM2.5), and attainment for all other criteria pollutants. The facility is a synthetic minor source of sulfur dioxide (SO2) and nitrogen oxide (NOx), as established in federally enforceable PTI 14-02068 modification, issued 2/17/04, in order to avoid triggering major source status under Title V.

4. Source Emissions:

With the renewal of this FEPTIO, SO2 emissions will remain limited to 12.03 TPY, NOx emissions will remain limited to 17.66 TPY, particulate matter (PM) and particulate matter 10 microns and less PM10 will remain limited to 0.17 tons per year, and VOC will remain limited to 0.16 tons per year. In order to meet this limitation, the maximum hours of operation will be limited to 420 hours per year based upon a rolling, 12-month summation. Recordkeeping and reporting requirements will ensure compliance with these limitations.

5. Conclusion:

With the federally enforceable limitations established in PTI 14-02068 modification issued 2/17/04 and carried through with this FEPTIO for emissions unit B008, the permittee will continue to be a synthetic minor for SO2 and NOx emissions. The permittee will maintain records and submit reports to demonstrate compliance with these permit limitations.

6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
SO2	12.03
NOx	17.66



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Permit Strategy Write-Up**  
**Permit Number:** P0100563  
**Facility ID:** 1483060000

VOC	0.16
PE/PM10	0.17
CO	3.02

PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
City of Lebanon

Issue Date: 9/22/2009

Permit Number: P0100563

Permit Type: Renewal

Permit Description: Renewal permit for 12500 KW GE Turbine. This would be the first issue permit after PTI modification of 14-02068 issued 2/17/04.

Facility ID: 1483060000

Facility Location: City of Lebanon  
119 South St,  
Lebanon, OH 45036

Facility Description: Fossil Fuel 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 Alberta Mellon at Hamilton County Dept. of Environmental Services, 250 William Howard Taft Pkwy. or (513)946-7777. The permit can be downloaded from the Web page: [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc)





State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**DRAFT**

**Air Pollution Permit-to-Install and Operate**  
for  
City of Lebanon

Facility ID: 1483060000  
Permit Number: P0100563  
Permit Type: Renewal  
Issued: 9/22/2009  
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  
City of Lebanon

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State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0100563

**Facility ID:** 1483060000

**Effective Date:** To be entered upon final issuance

# Authorization

Facility ID: 1483060000

Application Number(s): A0032300

Permit Number: P0100563

Permit Description: Renewal permit for 12500 KW GE Turbine. This would be the first issue permit after PTI modification of 14-02068 issued 2/17/04.

Permit Type: Renewal

Permit Fee: \$0.00 *DO NOT send payment at this time - subject to change before final issuance*

Issue Date: 9/22/2009

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:

City of Lebanon  
119 South St  
Lebanon, OH 45036

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:

Hamilton County Dept. of Environmental Services  
250 William Howard Taft Pkwy.  
Cincinnati, OH 45219-2660  
(513)946-7777

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:** P0100563

**Facility ID:** 1483060000

**Effective Date:** To be entered upon final issuance

## Authorization (continued)

Permit Number: P0100563

Permit Description: Renewal permit for 12500 KW GE Turbine. This would be the first issue permit after PTI modification of 14-02068 issued 2/17/04.

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

<b>Emissions Unit ID:</b>	<b>B008</b>
Company Equipment ID:	Gas Turbine #1
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:** P0100563

**Facility ID:** 1483060000

**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 Hamilton County Dept. of Environmental Services 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:** P0100563

**Facility ID:** 1483060000

**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:** P0100563

**Facility ID:** 1483060000

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## **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:** P0100563

**Facility ID:** 1483060000

**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:** P0100563

**Facility ID:** 1483060000

**Effective Date:** To be entered upon final issuance

## **C. Emissions Unit Terms and Conditions**



**1. B008, Gas Turbine #1**

**Operations, Property and/or Equipment Description:**

12500 KW GE Turbine for Electric Generation (Unit No. 2) with water injection system

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. b)(1)b., c)(1), d)(1), and e)(1).

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)	<p>Nitrogen Oxide (NOx) emissions shall not exceed 84.1 pounds per hour.</p> <p>Carbon Monoxide (CO) emissions shall not exceed 14.4 pounds per hour.</p> <p>Sulfur Dioxide (SO2) emissions shall not exceed 57.3 pounds per hour.</p> <p>Particulate Emissions and emissions of particulate matter 10 microns and less in diameter (PE/PM10) shall not exceed 0.8 pound per hour.</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 0.8 pound per hour.</p> <p>The requirements of this rule also include compliance with the requirements of 40 CFR part 60 subpart GG and OAC rules</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		3745-21-07(A)(1) and 3745-21-08.
b.	OAC rule 3745-31-05(D)(1)(b)	<p>Nitrogen Oxide (NOx) emissions shall not exceed 17.66 tons per year (TPY).*</p> <p>Carbon Monoxide (CO) emissions shall not exceed 3.02 TPY*.</p> <p>Sulfur Dioxide (SO2) emissions shall not exceed 12.03 TPY*.</p> <p>Particulate Emissions and emissions of particulate matter 10 microns and less in diameter (PE/PM10) shall not exceed 0.17 TPY*.</p> <p>Volatile Organic Compound (VOC) emissions shall not exceed 0.16 TPY*.</p> <p>*based upon a rolling, 12-month summation.</p> <p>See c)(1).</p>
c.	40 CFR Part 60, Subpart GG 60.332(a)(1)	No owner or operator subject to the provisions of 40 CFR Part 60, Subpart GG shall cause to be discharged into the atmosphere from any stationary gas turbine, any gases which contain nitrogen oxide in excess of 75 ppmv at 15% oxygen and on a dry basis as calculated using the formula in 60.332(a)(1).
d.	40 CFR Part 60, Subpart GG 60.333(b)	The sulfur content limitation specified by this rule is less stringent than the sulfur content limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.
f.	OAC rule 3745-17-11(B)(4)	The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
g.	OAC rule 3745-18-06(F)	The sulfur content limitation specified by this rule is less stringent than the sulfur content limitation established pursuant to OAC rule 3745-31-05(A)(3).
h.	OAC rule 3745-21-08	See b)(2)e.



(2) Additional Terms and Conditions

- a. Compliance with OAC rule 3745-31-05(A)(3) shall be demonstrated by the use of a water injection system for NOx emission control, compliance with the applicable emission limitations, compliance with the requirements of 40 CFR Part 60, Subpart GG for combustion turbines and compliance with the visible emission limitation.
- b. The permittee is exempt from using the water injection system for the control of NOx emissions when ice fog is deemed a traffic hazard. Ice fog means an atmospheric suspension of highly reflective ice crystals.
- c. The hourly emission limitations outlined are based upon the emissions unit's Potential to Emit (PTE). Therefore, no hourly records are required to demonstrate compliance with these limitations.
- d. The application and enforcement of the provisions of the New Source Performance Standards (NSPS), as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60, are delegated to the Ohio Environmental Protection Agency. The requirements of 40 CFR Part 60 are also federally enforceable.
- e. The design of the emissions unit and the technology associated with the current operating practices satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B).

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. On June 24, 2003, the rule revision was submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP); however, 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.

c) Operational Restrictions

- (1) The maximum annual operating hours for emissions unit B008 shall not exceed 420 hours, based upon a rolling 12-month summation of the operating hours.  
  
The permittee has existing records to demonstrate compliance with this limitation upon permit issuance.
- (2) The permittee shall not burn any fuel in the combustion turbine which contains sulfur in excess of 0.30 percent by weight.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain monthly records of the following information:
  - a. The operating hours for each month,
  - b. The updated rolling, 12-month summation of the operating hours for the current month and the preceding eleven calendar months.



- c. The NO<sub>x</sub> emissions for each month, in tons.
  - d. The CO, SO<sub>2</sub>, PM/PM<sub>10</sub> and VOC emissions for each month, in tons.
  - e. The updated rolling, 12-month summation of the NO<sub>x</sub>, SO<sub>2</sub>, CO, PM/PM<sub>10</sub> and VOC emissions for the current month and the preceding eleven calendar months.
- (2) The permittee shall install and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired into the turbine. This system shall be accurate to +/- 5.0 percent and shall be approved by the Director.
- (3) The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below:

a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as ASTM methods D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

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:

The rolling, 12-month summation of the operating hours and the emission limitations outlined in b)(1)b.

- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

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

Nitrogen Oxide (NOx) emissions shall not exceed 84.1 pounds per hour.

No owner or operator subject to the provisions of 40 CFR Part 60, Subpart GG shall cause to be discharged into the atmosphere from any stationary gas turbine, any gases which contain nitrogen oxide in excess of 75 ppmv at 15% oxygen and on a dry basis.

Applicable Compliance Method:

If testing is required to demonstrate compliance with the allowable emission limitation of 75 ppmv NOx ( which corresponds to 84.1 pounds per hour NOx) then testing shall be conducted using the following methods: Methods 1-4 and 20 of 40 CFR Part 60, Appendix A.

- (2) Emission Limitations:

Carbon Monoxide (CO) emissions shall not exceed 14.4 pounds per hour.

Sulfur Dioxide (SO2) emissions shall not exceed 57.3 pounds per hour.



Particulate Emissions and emissions of particulate matter 10 microns and less in diameter (PE/PM10) shall not exceed 0.8 pound per hour.

Volatile Organic Compound (VOC) emissions shall not exceed 0.8 pound per hour.

Applicable Compliance Methods:

Compliance with the pounds per hour emission limitations may be demonstrated by multiplying the actual fuel input rate (mmBtu/hour) by the emission factors in AP-42, Fifth Edition, 4/2000, Tables 3.1-1 and 3.1-2a for distillate oil-fired turbines (lb/mmBtu) which equals pounds of pollutants per hour.

(3) Emission Limitations:

Nitrogen Oxide (NOx) emissions shall not exceed 17.66 TPY.\*

Carbon Monoxide (CO) emissions shall not exceed 3.02 TPY\*.

Sulfur Dioxide (SO2) emissions shall not exceed 12.03 TPY\*.

Particulate Emissions and emissions of particulate matter 10 microns and less in diameter (PE/PM10) shall not exceed 0.17 TPY\*.

Volatile Organic Compound (VOC) emissions shall not exceed 0.16 TPY\*.

\*based upon a rolling, 12-month summation.

Applicable Compliance Method:

Compliance with the rolling, 12-month NOx, CO, SO2, PE/PM10 and VOC emissions limitations shall be demonstrated by the record keeping requirement in d)(1).

(4) Emission Limitation

Visible particulate emissions from any/the stack shall not exceed 20 percent opacity as a six-minute average, except as specified by rule.

Applicable Compliance Method

Compliance shall be determined through visible emission observations performed in accordance with U.S. EPA Method 9.

(5) Emission Limitation:

The permittee shall not burn any fuel in the combustion turbine which contains sulfur in excess of 0.30 percent by weight.

Applicable Compliance Method:

Compliance with the sulfur content limitation shall be demonstrated by the record keeping requirement in d)(3).



State of Ohio Environmental Protection Agency  
Division of Air Pollution Control

**Draft Permit-to-Install and Operate**

**Permit Number:** P0100563

**Facility ID:** 1483060000

**Effective Date:** To be entered upon final issuance

(6) Emission Limitation:

The maximum annual operating hours for emissions unit B008 shall not exceed 420 hours, based upon a rolling 12-month summation of the operating hours

Applicable Compliance Method:

Compliance with the operating hours limitation shall be demonstrated by the record keeping requirement in d)(1).

g) Miscellaneous Requirements

(1) None.