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.ohio.gov

MAILING ADDRESS:
P.O. Box 1049
Columbus, OH 43216-1049

12/3/2009

Certified Mail

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

Drew Parker
DPL Energy LLC
1065 Woodman Drive
Dayton, OH 45432-1423

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL
Facility ID: 0857043334
Permit Number: P0104867
Permit Type: Administrative Modification
County: Montgomery

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Please complete a survey at www.epa.ohio.gov/dapc/permitsurvey.aspx and give us feedback on your permitting experience. We value your opinion.

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission ("ERAC") under Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and describe the action complained of and the grounds for the appeal. The appeal must be filed with the ERAC within thirty (30) days after notice of the Director's action. A filing fee of $70.00 must be submitted to the ERAC with the appeal, although the ERAC, has discretion to reduce the amount of the filing fee if you can demonstrate (by affidavit) that payment of the full amount of the fee would cause extreme hardship. If you file an appeal of this action, you must notify Ohio EPA of the filing of the appeal (by providing a copy to the Director) within three (3) days of filing your appeal with the ERAC. Ohio EPA requests that a copy of the appeal also be provided to the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the ERAC at the following address:

Environmental Review Appeals Commission
309 South Fourth Street, Room 222
Columbus, OH 43215

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. If you have any questions regarding this permit, please contact the Regional Air Pollution Control Agency. This permit has been posted to the Division of Air Pollution Control (DAPC) Web page http://www.epa.ohio.gov.

Sincerely,

Michael W. Ahern

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

Cc: U.S. EPA Region 5 *Via E-Mail Notification*
Regional Air Pollution Control Agency

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

FINAL

Air Pollution Permit-to-Install
for
DPL Energy LLC

Facility ID:	0857043334
Permit Number:	P0104867
Permit Type:	Administrative Modification
Issued:	12/3/2009
Effective:	12/3/2009

State of Ohio Environmental Protection Agency
Division of Air Pollution Control

Air Pollution Permit-to-Install
for
DPL Energy LLC

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Authorization

Facility ID: 0857043334
Facility Description: Electric Services
Application Number(s): M0000436
Permit Number: P0104867
Permit Description: The permit is being modified to allow for the use of the Low Mass Emissions Monitoring Methodology to document compliance with the emission limits of the permit.
Permit Type: Administrative Modification
Permit Fee: $1,000.00
Issue Date: 12/3/2009
Effective Date: 12/3/2009

This document constitutes issuance to:

DPL Energy LLC
2101 Arbor Boulevard
Dayton, OH 45439-1511

Of a Permit-to-Install 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:

Regional Air Pollution Control Agency
117 South Main Street
Dayton, OH 45422-1280
(937)225-4435

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

Authorization (continued)

Permit Number: P0104867
Permit Description: The permit is being modified to allow for the use of the Low Mass Emissions Monitoring Methodology to document compliance with the emission limits of the permit.

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

Group Name: Combustion Turbines

Emissions Unit ID:	**P001**
Company Equipment ID:	CT4 - Combustion Turbine No. 4
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P002**
Company Equipment ID:	CT5 - Combustion Turbine No. 5
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P003**
Company Equipment ID:	CT6 - Combustion Turbine No. 6
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**P004**
Company Equipment ID:	CT7 - Combustion Turbine No. 7
Superseded Permit Number:	
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. Federally Enforceable Standard Terms and Conditions

a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:

(1) Standard Term and Condition A. 2.a), Severability Clause

(2) Standard Term and Condition A. 3.c) through A. 3.e) General Requirements

(3) Standard Term and Condition A. 6.c) and A. 6.d), Compliance Requirements

(4) Standard Term and Condition A. 9., Reporting Requirements

(5) Standard Term and Condition A. 10., Applicability

(6) Standard Term and Condition A. 11.b) through A. 11.e), Construction of New Source(s) and Authorization to Install

(7) Standard Term and Condition A. 14., Public Disclosure

(8) Standard Term and Condition A. 15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(9) Standard Term and Condition A. 16., Fees

(10) Standard Term and Condition A. 17., Permit Transfers

2. Severability Clause

a) A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they are required under the Act, or any its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

3. General Requirements

a) The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and re-issuance, or modification.

b) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c) This permit may be modified, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d) This permit does not convey any property rights of any sort, or any exclusive privilege.

e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

4. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

(1) The date, place (as defined in the permit), and time of sampling or measurements.

(2) The date(s) analyses were performed.

(3) The company or entity that performed the analyses.

(4) The analytical techniques or methods used.

(5) The results of such analyses.

(6) The operating conditions existing at the time of sampling or measurement.

b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

(1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Regional Air Pollution Control Agency.

(2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Regional Air Pollution Control Agency. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.

(3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Regional Air Pollution Control Agency every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

(4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Regional Air Pollution Control Agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

6. Compliance Requirements

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

b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

c) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

(1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

(2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

(3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

(4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

d) The permittee shall submit progress reports to the Regional Air Pollution Control Agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

(1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

(2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

7. Best Available Technology

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

8. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

9. Reporting Requirements

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Regional Air Pollution Control Agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Regional Air Pollution Control Agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e.,

postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

10. Applicability

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

11. Construction of New Sources(s) and Authorization to Install

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

b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed through completion of the annual PER covering the last period of operation of the affected emissions unit(s).

d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the PER covering the last period the emissions unit operated.

No emissions unit certified by the authorized official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31.

e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a PER, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

13. Construction Compliance Certification

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.

b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

14. Public Disclosure

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

15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly (i.e., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

16. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

17. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Regional Air Pollution Control Agency must be notified in writing of any transfer of this permit.

18. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

19. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

B. Facility-Wide Terms and Conditions

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

   a) None.

2. PSD REQUIREMENTS

   The source described in this Permit to Install is subject to the applicable provisions of the Prevention of Significant Deterioration (PSD) regulations as promulgated by the United States Environmental Protection Agency 40 CFR 52.21. The authority to apply and enforce the PSD regulations has been delegated to the Ohio Environmental Protection Agency. The terms and conditions of this permit and the requirements of the PSD regulations are also enforceable by the United States Environmental Protection Agency.

   In accordance with 40 CFR 124.15, 124.19 and 124.20, the following shall apply: (1) the effective date of this permit shall be 30 days after the service of notice to any public commentors of the final decision to issue, modify, or revoke and re-issue the permit, unless the service of notice is by mail, in which case the effective date of the permit shall be 33 days after the service of notice; and (2) if an appeal is made to the Environmental Appeals Board of the United States Environmental Protection Agency, the effective date of the permit is suspended until such time as the appeal is resolved or denied.

   Appeals will be addressed to:

   United States Environmental Protection Agency

   Environmental Appeals Board

   401 M Street, SW (MC-113do)

   Washington, DC 20460

3. The permittee shall ensure that any CAIR NO_X, SO_2, or NO_X ozone season units complies with the requirements of OAC 3745-109, which includes submitting timely permit applications. The permittee shall ensure that the affected emissions units comply with those requirements. Emissions exceeding any allowances that are lawfully held under Ohio rule 3745-109 are prohibited.

C. Emissions Unit Terms and Conditions

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

EU ID	Operations, Property and/or Equipment Description
P001	Natural gas and No. 2 fuel oil fired simple cycle stationary combustion turbine No. 4 - Tait CT4, with a nominal production rating of 80 MW and a nominal heat input of 1115.2 mmBtu/hour, with dry low NOx combustion and water injection controls
P002	Natural gas and No. 2 fuel oil fired simple cycle stationary combustion turbine No. 5 - Tait CT5, with a nominal production rating of 80 MW and a nominal heat input of 1115.2 mmBtu/hour, with dry low NOx combustion and water injection controls
P003	Natural gas and No. 2 fuel oil fired simple cycle stationary combustion turbine No. 6 - Tait CT6, with a nominal production rating of 80 MW and a nominal heat input of 1115.2 mmBtu/hour, with dry low NOx combustion and water injection controls
P004	Natural gas and No. 2 fuel oil fired simple cycle stationary combustion turbine No. 7 - Tait CT7, with a nominal production rating of 80 MW and a nominal heat input of 1115.2 mmBtu/hour, with dry low NOx combustion and water injection controls

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

(1) d)(12) and d)(13).

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.	40 CFR Part 52, Section 52.21 and OAC rule 3745-31-10 through OAC rule 3745-31-20	Particulate/PM_{10} emissions from this emissions unit shall not exceed 0.013 lb/mmBtu actual heat input when firing natural gas; 0.026 lb/mmBtu actual heat input when firing No. 2 fuel oil, and 46.12 tons/year (TPY) as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004. Nitrogen oxides (NO_X) emissions from this emissions unit shall not exceed 15 ppmv at 15% oxygen on a dry basis at full load, when firing natural gas, based on a one-hour average as determined through data from the NO_X continuous emission monitoring system (CEMs);161 lbs/hr at all operating loads when firing natural gas; 42 ppmv at 15% oxygen on a dry

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	40 CFR Part 52, Section 52.21 and OAC rule 3745-31-10 through OAC rule 3745-31-20	basis at full load, when firing No.2 fuel oil, based on a one-hour average as determined through data from the NO_X CEMs; 269 lbs/hr at all operating loads when firing No. 2 fuel oil; and 1373.32 TPY as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004. Carbon monoxide (CO) emissions from this emissions unit shall not exceed 20 ppmv at 15% oxygen on a dry basis, when firing natural gas and No. 2 fuel oil, based on a 3-hour test average at full load (also see b)(2)g). CO emissions from this emissions unit shall not exceed 301 lbs/hr at all operating loads, excluding start-up and shutdown periods when firing natural gas; 413 lbs/hr during start-up and shutdown periods when firing natural gas; 800 lbs/hr at all operating loads, when firing No. 2 fuel oil; and 724 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004, including periods of start-up and shutdown. Sulfur dioxide (SO_2) emissions from this emissions unit shall not exceed 0.0026 lb/mmBtu actual heat input, when firing natural gas; 0.055 lb/mmBtu actual heat input, when firing No. 2 fuel oil; and 138.6 tons/year as a rolling, 12-month summation combined from units P001, P002, P003 and P004. Sulfuric acid mist emissions from this emissions unit, during oil-firing only, shall not exceed 0.0054 lb/mmBtu, actual heat input and 12.64 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(D) Synthetic minor to avoid PSD rule requirements	Volatile organic compound (VOC) emissions from this emissions unit shall not exceed 31.64 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004.
c.	OAC rule 3745-31-05(D) Synthetic minor to avoid MACT rule requirements	Formaldehyde emissions from this emissions unit shall not exceed 5.11 TPY as a rolling, 12-month summation combined from units P001, P002, P003 and P004.
d.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
e.	OAC rule 3745-31-05(A)(3)	VOC emissions from this emissions unit shall not exceed 4 lbs/hr when firing natural gas and 5.5 lbs/hr when firing No. 2 fuel oil. Formaldehyde emissions from this emissions unit shall not exceed 0.00061 lb formaldehyde/mmBtu actual heat input. The requirements of this rule also include compliance with the requirements of 40 CFR Part 52, Section 52.21 and OAC rules 3745-31-10 through 3745-31-20; OAC rule 3745-31-05(C); and OAC rule 3745-17-07(A)(1).
f.	40 CFR Part 75	See Section A.5.
g.	OAC rule 3745-17-11(B)(4) OAC rule 3745-18-06(F) 40 CFR Part 60, Subpart GG	The emission limitations specified by these rules are less stringent than the emission limitations established pursuant to 40 CFR Part 52, Sections 52.21 and OAC rules 3745-31-10 through 3745-31-20.
h.	OAC rule 3745-21-08(B)	See b)(2)d.

(2) Additional Terms and Conditions

a. The listed particulate/PM_{10} emission limitations are more stringent than the requirements of OAC rule 3745-17-11(B)(4). They were chosen by the applicant

to ensure compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20 and 40 CFR Part 52, Section 52.21 "Prevention of significant deterioration of air quality".

b. The listed nitrogen oxides emission limitations are more stringent than the requirements of 40 CFR Part 60, Subpart GG. They were chosen by the applicant to ensure compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20 and 40 CFR Part 52, Section 52.21 "Prevention of significant deterioration of air quality".

c. The listed sulfur dioxide emission limitations are more stringent than the requirements of 40 CFR Part 60, Subpart GG and OAC rule 3745-18-06(F). They were chosen by the applicant to ensure compliance with the requirements of OAC rules 3745-31-10 through 3745-31-20 and 40 CFR Part 52, Section 52.21 "Prevention of significant deterioration of air quality".

d. The permittee has satisfied the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08 by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in permit to install (PTI) P0104867.

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. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

e. The following Best Available Control Technology (BACT) determinations have been made in accordance with the PSD regulations:

Particulate/PM_{10} Emissions - The BACT determination is the use of only clean burning fuels, natural gas and No. 2 fuel oil in these combustion turbines, capable of meeting the emission limitations listed in b)(1)a.

Nitrogen oxide emissions - The BACT determination is the use of dry low- NO_X burners (DLNB) when firing natural gas and water injection when firing fuel oil and the ppmv NO_X levels listed in b)(1)a.

Carbon monoxide emissions - The BACT determination is the use of efficient combustion technology inherent to the design of the combustion turbines and the ppmv CO levels listed in b)(1)a.

Sulfur dioxide emissions - The BACT determination is the use of natural gas as the primary fuel and No. 2 fuel oil as back-up fuel in these combustion turbines and a maximum sulfur content of 0.05 percent by weight of the fuel oil.

Sulfuric acid mist emissions - The BACT determination is the use of natural gas as the primary fuel and No. 2 fuel oil as the back-up fuel in these combustion turbines.

f. "Start-up" shall be defined as the time necessary to bring a turbine on line from a no-load condition to dry low NO_X combustion mode during natural gas combustion, not to exceed thirty (30) minutes. Shutdown periods shall not exceed thirty (30) minutes.

g. If the permittee shows that the unit cannot consistently meet the CO ppm limitations, Ohio EPA will consider an application to modify the permit to install.

h. "Full load" shall be defined as all periods when the hourly average electrical output exceeds 72 MW.

i. Based on the evaluation of the PM_{10} emissions from this emissions unit, it was determined that the PM_{10} emissions did not trigger the Prevention of Significant Deterioration (PSD) permitting requirements. Therefore, the regulated pollutant for purposes of this permit is particulate emissions and compliance with the particulate emission limitation shall be determined in accordance with the U.S. EPA approved test methods for particulate emissions.

j. In lieu of monitoring the exhaust stack gas flowrate as required by 40 CFR Part 60, Appendix B - Performance Specification 6, the permittee shall use a certified NO_X continuous emissions monitoring system in conjunction with a fuel flow monitor as described in 40 CFR Part 75, and certified CO continuous emissions monitoring system in conjunction with a fuel flow monitor (in a manner similar to that used for NO_X) to meet these requirements. The relative accuracy requirements of Performance Specifications 6 shall apply to the NO_X and CO continuous emissions monitoring systems.

k. If this emissions unit meets the requirements of 40 CFR 75.19(a)(1), (a)(2) and (b), the low mass emissions (LME) excepted methodology in 40 CFR 75.19(c) may be used in lieu of continuous emission monitoring systems or, if applicable, in lieu of methods under Appendices D, E, and G to 40 CFR Part 75, for the purpose of determining the unit heat input, NO_X, SO_2, and CO_2 mass emissions, and the NO_X emission rate under 40 CFR Part75. If the permittee of a qualifying emissions unit elects to use the LME methodology, it must be used for all parameters that are required to be monitored by the applicable program(s). For example, for an Acid Rain Program LME unit, the methodology must be used to estimate SO_2, NO_X, and CO_2 mass emissions, NO_X emission rate, and unit heat input.

c) Operational Restrictions

(1) The maximum annual operating hours for emissions units P001, P002, P003 and P004 combined shall not exceed 10,016** while burning natural gas and 4216** when burning No. 2 fuel oil, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first twelve calendar months of operation following the initial use of No. 2 fuel oil in any one of the emissions units P001 through P004, the permittee shall not exceed the cumulative operating hours specified in the following table:

Month	Maximum allowable cumulative operating hours while burning No. 2 fuel oil
1	1056
1 – 2	2108
1 – 3	3164
1 – 4	4216
1 – 5	4216
1 – 6	4216
1 – 7	4216
1 – 8	4216
1 – 9	4216
1 – 10	4216
1 – 11	4216
1 – 12	4216

** The permittee may combust 1.2 additional hours of natural gas for every hour fuel oil is not combusted, up to 15,020 hours annually of natural gas combustion.

After the first 12 calendar months of operation following the initial use of No. 2 fuel oil in any one of the emissions units P001 through P004, compliance with the annual operating hours limitation shall be based upon a rolling, 12-month summation of the operating hours.

(2) The sulfur content of the No. 2 fuel oil fired in this emissions unit shall not exceed 0.05%, by weight.

(3) In order to establish federally enforceable limitations upon the potential to emit for CO, the permittee shall utilize the continuous CO monitoring system to demonstrate continuous compliance with the hourly and combined annual emissions limitations established by this permit.

(4) The permittee shall burn only pipeline quality natural gas or number two fuel oil in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

(1) Continuous NO_X Monitoring

a. The permittee shall either operate and maintain equipment to continuously monitor and record NO_X emissions from this emissions unit in units of the applicable standard(s) or an excepted monitoring system that meets the requirements of 40 CFR 75.19 (water-to-fuel ratio for water injection controls and operating mode and combustion reference temperature for dry low NO_X systems, as specified in the quality assurance plan specified in 40 CFR 75.19(e)(5)). Such continuous NO_X monitoring and recording equipment shall comply with the applicable requirements specified in 40 CFR Part 60 and Part 75.

b. If used, each continuous NO_X monitoring system consists of all the equipment used to acquire and record data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

c. If used, the permittee shall maintain on-site documentation from the USEPA or the Ohio EPA that the continuous NO_X monitoring system has been certified in accordance with the applicable requirements specified in 40 CFR Part 60 and Part 75. The letter of certification shall be made available to the Director upon request.

d. If used, the permittee shall maintain records of the following data obtained by the continuous NO_X monitoring system: emissions of NO_X in ppmvd at 15% oxygen at full load, emissions of NO_X in lbs/hr, and results of daily zero/span calibration checks, results of quarterly cylinder gas audits, linearity check, or relative accuracy test audits, and magnitude of manual calibration adjustments.

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

f. The permittee may conduct the relative accuracy test audits for the continuous nitrogen oxides monitoring system in accordance with the frequencies required for monitoring systems subject to 40 CFR Part 75, Appendix B; however, the permittee is still required to provide the audit results in units of the applicable standard(s), in accordance with 40 CFR Part 60. Cylinder gas audits may be conducted in accordance with the frequencies specified in 40 CFR Part 75, Appendix B for linearity checks. In addition, linearity checks conducted pursuant to 40 CFR Part 75, Appendix B, may be used in place of quarterly cylinder gas audits, as required in 40 CFR Part 60.

g. Data substitution, when required by 40 CFR Part 75, shall be performed in accordance with the applicable procedures in Subpart D, Appendix D, or Appendix E of 40 CFR Part 75.

h. For each low mass emissions unit for which fuel-and-unit-specific NO_X emission rates are determined in accordance with 40 CFR 75.19(c)(1)(iv) and which has add-on NO_X emission controls of any kind or uses dry low- NO_X technology, the

permittee shall develop and keep on-site a quality assurance plan which explains the procedures used to document proper operation of the NO_X emission controls. The plan shall include the parameters monitored (e.g., water-to-fuel ratio) and the acceptable ranges for each parameter used to determine proper operation of the unit's NO_X controls.

(2) Continuous CO Emissions Monitoring

a. The permittee shall either operate and maintain equipment to continuously monitor and record CO emissions from this emissions unit in units of the applicable standard(s) or, if the emissions unit meets the requirements of 40 CFR 75.19 for SO_2, NO_X and CO_2, establish fuel-and-unit-specific CO emissions rates using the same methodology as specified for NO_X in 40 CFR 75.19(c)(1)(iv)(G). Note that the requirements of 40 CFR 75 do not apply to CO emissions. Such continuous CO monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.

b. If used, each continuous CO monitoring system consists of all the equipment used to acquire and record data and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

c. If used, the permittee shall maintain on-site documentation from the USEPA or the Ohio EPA that the continuous CO monitoring system has been certified in accordance with the applicable requirements specified in 40 CFR Part 60. The letter of certification shall be made available to the Director upon request.

d. If used, the permittee shall maintain records of the following data obtained by the continuous CO monitoring system: emissions of CO in lbs/hr, results of daily zero/span calibration checks, results of quarterly cylinder gas audits, or relative accuracy test audits, and magnitude of manual calibration adjustments.

e. The permittee shall develop a written quality assurance/quality control plan for the continuous CO monitoring system designed to ensure continuous valid and representative readings of CO emissions in units of the applicable standard(s). The plan shall follow the applicable requirements for 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook documenting the activities related to the continuous CO monitoring system must be kept on site and available for inspection during regular office hours.

f. The permittee may conduct the relative accuracy test audits for the continuous CO monitoring system in accordance with the frequencies required for monitoring systems subject to 40 CFR Part 75, Appendix B; however, the permittee is still required to provide the audit results in units of the applicable standard(s), in accordance with 40 CFR Part 60. Cylinder gas audits may be conducted in accordance with the frequencies specified in 40 CFR Part 75, Appendix B for linearity checks. In addition, linearity checks conducted pursuant to 40 CFR Part 75, Appendix B, may be used in place of quarterly cylinder gas audits, as required in 40 CFR Part 60.

(3) In accordance with 40 CFR Part 60, Subpart GG, Section 60.334(h)(1), the permittee shall monitor the sulfur content of the fuel being fired in the turbine except as provided in

40 CFR 60.334(h)(3). The frequency of determination of this value shall be in accordance with 40 CFR 60.334(i).

(4) For each shipment of oil received for burning in this emissions unit, the permittee shall 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 SO_2 emission rate (in lb/mmBtu).

(5) Pursuant to 40 CFR 60.334(i)(1) or (3), the permittee shall determine fuel sulfur content in accordance with the requirements of 40 CFR 60.335(b)(10)(i) and 60.335(b)(10)(ii).

(6) For each day during which the permittee burns a fuel other than pipeline quality natural gas or number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

(7) The permittee shall maintain monthly records of the following information:

a. The summation of the operating hours for this emissions unit, in hours/month, when burning natural gas and/or when burning No. 2 fuel oil. The summation of the operating hours for emissions units P001, P002, P003 and P004 combined when burning natural gas. The summation of the operating hours for emissions units P001, P002, P003 and P004 combined when burning fuel oil.

b. During the first twelve calendar months of operation following the initial use of No. 2 fuel oil in any one of the emissions units P001 through P004, the cumulative operating hours for each calendar month when burning No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined. Following the first twelve calendar months of operation following the initial use of No. 2 fuel oil in any one of the emissions units P001 through P004, the rolling, 12-month summation of the operating hours for this emissions unit, in hours per rolling, 12-month period when burning No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined. The rolling, 12-month summation of the operating hours for this emissions unit, in hours per rolling, 12-month period when burning natural gas for emissions units P001, P002, P003 and P004 combined.

c. The actual heat input of this emissions unit, in mmBtu/month, when burning natural gas and/or when burning No. 2 fuel oil.

d. The rolling, 12-month summation of the particulates/PM_{10}, NO_X, CO, SO_2, sulfuric acid mist, VOC, and formaldehyde emissions, in tons, for emissions units P001, P002, P003 and P004 combined. The monthly emissions shall be added to the total emissions from the previous 11 months to determine the rolling, 12-month summation of emissions.

e. The permittee shall monitor and record all periods of time when the unit is operated at "full load" conditions, based upon definition of full load in b)(2)h.

f. The date, time and duration, in minutes of each start-up and shutdown. (The terms start-up and shutdown are defined in b)(2)f.)

(8) If the permittee uses 40 CFR Part 75 Appendix D to comply with the SO_2 emissions limit, the permittee shall install, operate and maintain equipment to continuously monitor and

record the actual fuel flow to this emissions unit when the emissions unit is in operation. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75. If the fuel flow monitoring and/or recording equipment is (are) not in service when the emissions unit is in operation, the permittee shall comply with the appropriate missing data procedures specified in 40 CFR Part 75.

(9) If using a continuous diluent monitor, the permittee shall operate and maintain equipment to continuously monitor and record the percent oxygen in the stack serving this emissions unit when the emissions unit is in operation. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 75. The monitoring and recording equipment shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee.

(10) If the permittee uses 40 CFR Part 75.19 to comply with the SO_2 and NO_X emissions limits, the permittee shall maintain hourly records of the following information:

a. Date and hour;

b. Unit operating time (units using the long term fuel flow methodology report operating time to be 1);

c. Fuel type (pipeline natural gas, natural gas, other gaseous fuel, residual oil, or diesel fuel). If more than one type of fuel is combusted in the hour, indicate the fuel type resulting in the highest emission factor for each parameter (SO_2, NO_X emission rate, and CO_2) separately;

d. Average hourly NO_X emission rate (lb/mmBtu, rounded to the nearest thousandth);

e. Hourly NO_X mass emissions (lbs, rounded to the nearest tenth);

f. Hourly SO_2 mass emissions (lbs, rounded to the nearest tenth);

g. Hourly CO_2 mass emissions (tons, rounded to the nearest tenth);

h. Hourly CO mass emissions (tons, rounded to the nearest tenth);

i. Hourly calculated unit heat input in mmBtu;

j. Hourly unit output in gross load or steam load;

k. The method of determining hourly heat input: unit maximum rated heat input, unit long term fuel flow or group long term fuel flow;

l. The method of determining NO_X emission rate used for the hour: default based on fuel combusted, unit specific default based on testing or historical data, group default based on representative testing of identical units, unit specific based on testing of a unit with NO_X controls operating, or missing data value;

m. Control status of the unit;

n. Base, peak or full load indicator (as applicable); and

o. Multiple fuel flag.

(11) If the permittee uses 40 CFR Part 75.19 to comply with the SO_2 and NO_X emissions limits, the permittee shall maintain quarterly records of the following information:

a. Type of fuel;

b. Beginning date and hour of long term fuel flow measurement period;

c. End date and hour of long term fuel flow period;

d. Quantity of fuel measured;

e. Units of measure;

f. Fuel gross calorific value (GCV) value used to calculate heat input;

g. Units of GCV;

h. Method of determining fuel GCV used;

i. Method of determining fuel flow over period;

j. Component-system identification code;

k. Quarter and year;

l. Total heat input (mmBtu); and

m. Operating hours in period.

(12) The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the ISCST3 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the ISCST3 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: formaldehyde

TLV (mg/m^3): 0.37

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration ($\mu g/m^3$): 1.6971

MAGLC ($\mu g/m^3$): 8.81

Pollutant: beryllium

TLV (mg/m^3): 0.002

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m^3): 0.0008

MAGLC (µg/m^3): 0.05

Pollutant: arsenic

TLV (mg/m^3): 0.01

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m^3): 0.0123

MAGLC (µg/m^3): 0.24

Pollutant: benzene

TLV (mg/m^3): 1.60

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m^3): 0.2142

MAGLC (µg/m^3): 38.10

Pollutant: sulfuric acid mist

TLV (mg/m^3): 1.00

Maximum Hourly Emission Rate (lbs/hr):1.0

Predicted 1-Hour Maximum Ground-Level Concentration (µg/m^3): 13.56

MAGLC (µg/m^3): 23.81

Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change.

Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

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

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

(13) The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

e) Reporting Requirements

(1) Continuous NO_X Emissions Reporting:

a. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting the date, commencement and completion time, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of NO_X values in excess of the applicable emission limitations specified in the terms and conditions of this permit. These reports shall also contain the total NO_X emissions for the calendar quarter (in tons).

For emissions units using water to fuel ratio monitoring, an excess emission shall be any unit operating hour for which the average water to fuel ratio, as measured by the excepted monitoring system, falls below the water to fuel ratio defined in the quality assurance plan required by 40 CFR 75.19(e)(5). Any unit operating hour in which no water or steam is injected into the emissions unit shall also be considered an excess emission. Each report shall include the average steam or water to fuel ratio, average fuel consumption, ambient conditions (temperature, pressure, and humidity), and gas turbine load during each excess emission.

For emissions units using combustion reference temperature monitoring, an excess emission shall be any unit operating hour for which the average combustion reference temperature, as measured by the excepted monitoring system, falls below the minimum combustion reference temperature defined in the quality assurance plan required by 40 CFR 75.19(e)(5). Each report shall include the average combustion reference temperature, ambient conditions (temperature, pressure, and humidity), and gas turbine load during each excess emission.

For emissions units using operating mode monitoring, an excess emission shall be any unit operating hour which the emissions unit was not operating in the pre-mix steady state mode, as measured by the excepted monitoring system. Each report shall include the operating mode, ambient conditions (temperature, pressure, and humidity), and gas turbine load during each excess emission.

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

For emissions units using water or steam to fuel ratio monitoring, a period of monitor downtime shall be any unit operating hour in which water or steam is injected into the emissions unit, but the essential parametric data needed to determine the steam or water to fuel ratio are unavailable or invalid.

For emissions units using combustion reference temperature monitoring, a period of monitor downtime shall be any unit operating hour in which the essential parametric data needed to determine the combustion reference temperature is unavailable or invalid.

For emissions units using operating mode monitoring, a period of monitor downtime shall be any unit operating hour in which the essential parametric data needed to determine the operating mode is unavailable or invalid.

c. If there are no excess NO_X emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunction.

The total operating time of the emissions unit and the total operating time of the continuous monitoring system while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

(2) Continuous CO Emissions Reporting:

a. The permittee shall submit reports within 30 days following the end of each calendar quarter to the Regional Air Pollution Control Agency documenting the date, commencement and completion time, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of CO values in excess of the applicable emission limitations specified in the terms and conditions of this permit. These reports shall also contain the total CO emissions for the calendar quarter (in tons).

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

c. If there are no excess CO emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the date, time, reason, and corrective action(s) taken for each time period of monitoring system malfunction. The total operating time of the emissions unit and the total operating time of the continuous CO monitoring system (if used) while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

(3) The permittee shall submit quarterly deviation (excursion) reports to the Regional Air Pollution Control Agency that identify any exceedances of the following:

a. For the first twelve calendar months of operation following the initial use of No. 2 fuel oil in any one of the emissions units P001 through P004, all exceedances of the maximum allowable cumulative operating hours limits while burning No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined.

b. Beginning after the first twelve calendar months of operation following the initial use of No. 2 fuel oil in any one of the emissions units P001 through P004, the rolling, 12-month operating hours limitations while burning No. 2 fuel oil for emissions units P001, P002, P003 and P004 combined.

c. The rolling, 12-month operating hours limitations while burning natural gas for emissions units P001, P002, P003 and P004 combined.

d. Any exceedances of the rolling, 12-month summation of particulates/PM_{10}, NO_X, CO, SO_2, sulfuric acid mist, VOC, or formaldehyde emission limitations, in tons, for emissions units P001, P002, P003 and P004, combined.

e. Any exceedances of the NO_X ppmv at 15% oxygen on a dry basis emissions limitations at full load conditions.

f. The allowable duration for all start-up and shutdown periods.

g. For fuel oil, any exceedances of the 0.05% by weight sulfur content and the calculated SO_2 emissions rate, in lb/mmBtu.

h. Any time during which the permittee burns a fuel other than pipeline quality natural gas or number two fuel oil.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

(4) The permittee shall submit quarterly reports which identify each period during which an exemption for ice-fog provided in 40 CFR Part 60.332(f) is in effect. The reports shall include the ambient conditions existing during the period, the date and time the air pollution control system was deactivated, and the date and time when the air pollution control system was reactivated. These reports shall be postmarked by April 30, July 30, October 30, and January 30 and each report shall cover the previous calendar quarter.

f) Testing Requirements

(1) Compliance with the emission limitation(s) in b)(1) shall be determined in accordance with the following method(s):

a. <u>Emission Limitations:</u>

0.013 lb (particulate emissions/PM_{10})/mmBtu actual heat input, when firing natural gas

0.026 lb particulate emissions/PM_{10})/mmBtu actual heat input, when firing No. 2 fuel oil

<u>Applicable Compliance Method:</u>

If required, compliance with the particulate emissions/PM_{10} emissions limitation when firing natural gas shall be based upon stack testing in accordance with Methods 1 through 5 of 40 CFR Part 60, Appendix A and, 40 CFR Part 51, Appendix M, Method 201 or 201A and 202.

Initial compliance with the particulate emissions/PM_{10} emissions limitation while burning No. 2 fuel oil shall be demonstrated by the performance testing as specified in f)(2).

b. <u>Emission Limitation:</u>

46.12 tons/year particulate emissions/PM_{10} as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in d)(7) and shall be determined through a summation of the particulate emissions/PM_{10} from the burning of natural gas and No. 2 fuel oil as follows:

i. The monthly particulate emissions/PM_{10} from the burning of natural gas shall be determined by multiplying the average emissions in lb particulate/PM_{10} emissions/mmBtu while burning natural gas derived from the most recent stack test by the actual heat input of this emissions unit for the month while burning natural gas, and dividing by 2,000 lbs/ton.

ii. The monthly particulate emissions/PM_{10} from the burning of No. 2 fuel oil shall be determined by multiplying the average emissions in lb particulate/PM_{10} emissions/mmBtu while burning No. 2 fuel oil derived from the stack test conducted in accordance with f)(2) by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil, and dividing by 2,000 lbs/ton.

iii. The combined rolling, 12-month summation of the particulate emissions/PM_{10} for emissions units P001, P002, P003 and P004 shall be the sum of f)(1)(b)i and f)(1)(b)ii for each emissions unit for the rolling, 12-month period.

c. Emission Limitations:

15 ppmvd NO_X at 15% oxygen, at full load, while burning natural gas, based on a 1-hour average as determined through data from the NO_X CEMs

42 ppmvd NO_X at 15% oxygen, at full load, while burning No. 2 fuel oil, based on a 1-hour average as determined through data from the NO_X CEMs

161 lbs/hour nitrogen oxides at all operating loads, while burning natural gas

269 lbs/hour nitrogen oxides, at all operating loads, while burning No. 2 fuel oil

Applicable Compliance Method:

Initial compliance with the allowable outlet concentration and the lbs/hour NO_X emission limitations while burning No. 2 fuel oil shall be demonstrated by the performance testing as specified in f)(2).

If a continuous NO_X monitoring system is used to determine compliance with these allowable NO_X emissions limitations above, compliance shall be based on the use of the continuous NO_X monitoring system specified in d)(1) and the applicable 40 CFR Part 60 and 75 requirements. Emissions calculated using the 40 CFR Part 75 bias adjustment factor or using missing data procedures due to monitor downtime shall not be used to determine compliance with the hourly emission limitation.

When combusting natural gas and using a monitoring system in compliance with 40 CFR 75.19, compliance shall be determined by multiplying the heat input

(mmBtu/hr) by 0.044 lb/mmBtu for P001 and P002, 0.041 lb/mmBtu for P003 and 0.049 lb/mmBtu for P004, which are the NO_X emissions rates determined in accordance with 40 CFR 75.19(c)(1)(iv)(G), or by an emissions factor determined in accordance with 40 CFR 75.19(c)(1)(iv)(A).

When combusting number two fuel oil and using a monitoring system in compliance with 40 CFR 75.19, compliance shall be determined by conducting an emissions test in accordance with 40 CFR 75.19(c)(1)(iv)(A) within 60 days of commencing fuel oil combustion.

If required, compliance with the allowable NO_X emission limitations above, shall be determined based on the results of emission testing conducted in accordance with 40 CFR Part 60, Appendix A, Reference Methods 1 - 4 and Method 7 or 7E, using an arithmetic average of three (3) one-hour test runs.

d. Emission Limitation:

1373.32 tons/year NO_X as a rolling, 12-month summation combined from emissions units P001, P002, P003 and P004

Applicable Compliance Method:

Compliance with the annual allowable NO_X emission limitation above shall be based upon the record keeping requirements established in d)(1) and d)(7) if using a continuous NO_X monitoring system, or d)(7), d)(10) and d)(11) if using a monitoring system in compliance with 40 CFR 75.19.

e. Emission Limitations:

20 ppmvd CO at 15% oxygen as a 3-hr test average at full load, when firing natural gas and No. 2 fuel oil

Applicable Compliance Method:

Initial compliance with the allowable outlet concentration while burning No. 2 fuel oil shall be demonstrated by the performance testing as specified in f)(2).

If required, compliance with the allowable outlet concentration while burning natural gas shall be determined through stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

f. Emission Limitations:

301 lbs CO/hour at all operating loads, excluding start-up and shutdown periods, while burning natural gas

413 lbs CO/hour during start-up and shutdown periods, while burning natural gas

800 lbs CO/hour at all operating loads, while burning No. 2 fuel oil

Applicable Compliance Method:

If a continuous CO monitoring system is used to determine compliance with the allowable CO emissions limitation above, compliance shall be based upon the data from the continuous CO emissions monitoring system and the monitoring and record keeping requirements specified in d)(2). Emissions calculated using missing data procedures due to monitor downtime shall not be used to determine compliance with the hourly emission limitation.

When combusting natural gas and using a monitoring system in compliance with 40 CFR 75.19, compliance shall be determined by multiplying the heat input (mmBtu/hr) by 0.085 lb/mmBtu for P001, 0.064lb/mmBtu for P002, 0.060 lb/mmBtu for P003 and 0.078 lb/mmBtu for P004, which are the CO emissions rates determined in accordance with 40 CFR 75.19(c)(1)(iv)(G), or by an emissions factor determined in accordance with 40 CFR 75.19(c)(1)(iv)(A).

When combusting number two fuel oil and using a monitoring system in compliance with 40 CFR 75.19, compliance shall be determined by conducting an emissions test in accordance with 40 CFR 75.19(c)(1)(iv)(A) within 60 days of commencing fuel oil combustion.

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation through stack testing conducted in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

g. Emission Limitation:

724 tons/year CO, as a rolling, 12-month summation combined from units P001, P002, P003 and P004, including periods of start-up and shutdown

Applicable Compliance Method:

Compliance with the annual allowable CO emission limitation above shall be based upon the record keeping requirements established in d)(2) and d)(7) if using a continuous CO monitoring system, or d)(7), d)(10) and d)(11) if using a monitoring system in compliance with 40 CFR 75.19.

h. Emission Limitations:

0.0026 lb SO_2/mmBtu actual heat input, while burning natural gas

0.055 lb SO_2/mmBtu actual heat input, while burning No. 2 fuel oil

Applicable Compliance Method:

When firing natural gas, compliance with this limitation will be assumed due to the negligible percent sulfur, by weight, in the fuel.

If required, the permittee shall perform or require the supplier to perform an analysis of the natural gas for sulfur content, in accordance with the appropriate ASTM method or an equivalent method as approved by the Director, in order to demonstrate compliance with this emission limitation using the appropriate equation specified in AP-42 Table 3.1-2a (4/00).

When firing number two fuel oil, compliance shall be based upon the fuel analysis and record keeping requirements specified in c)(2) and d)(4) and the use of the equations specified in OAC rule 3745-18-04(F).

i. Emission Limitation:

138.6 tons/year SO_2 as a rolling, 12-month summation combined from units P001, P002, P003 and P004

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in d)(7) and shall be determined through a summation of the SO_2 emissions from the burning of natural gas and No. 2 fuel oil as follows:

i. The monthly SO_2 emissions from the burning of natural gas shall be determined by multiplying the USEPA default value for pipeline quality natural gas (0.0006 lb SO_2/mmBtu) by the actual heat input of this emissions unit for the month while burning natural gas, and dividing by 2,000 lbs/ton.

ii. The monthly SO_2 emissions from the burning of No. 2 fuel oil shall be determined by multiplying the average calculated SO_2 emission rate (determined as an arithmetic average of the calculated SO_2 emission rates for the shipments received each month in d)(4) (lb/mmBtu)) by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil, and dividing by 2,000 lbs/ton.

iii. The combined rolling, 12-month summation of the SO_2 emissions for emissions units P001, P002, P003 and P004 shall be the sum of f)(1)i.i and f)(1)i.ii above for each emissions unit for the rolling, 12-month period.

j. Emission Limitation:

0.0054 lb sulfuric acid mist/mmBtu actual heat input, while burning No. 2 fuel oil

Applicable Compliance Method:

Compliance with the allowable emissions rate while burning No. 2 fuel oil shall be determined through stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 8 as specified in f)(2).

k. Emission Limitation:

12.64 tons/year sulfuric acid mist, as a rolling, 12-month summation combined from units P001, P002, P003 and P004

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in d)(7) and shall be determined by multiplying the average emissions in lb sulfuric acid mist/mmBtu derived from the stack test conducted in accordance with f)(2) by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil,

and dividing by 2,000 lbs/ton. The monthly sulfuric acid mist emissions for each emissions units P001, P002, P003 and P004 shall be summed and added to the total sulfuric acid mist emissions from the previous eleven months to determine the combined rolling, 12-month summation of sulfuric acid mist emissions for emissions units P001, P002, P003 and P004.

l. Emission Limitations:

4 lbs/hour VOC, while burning natural gas

5.5 lbs/hour VOC, while burning No. 2 fuel oil

Applicable Compliance Method:

Initial compliance with the allowable emissions limit while burning No. 2 fuel oil shall be demonstrated by the performance testing as specified in f)(2).

If required, compliance with the allowable emissions limit while burning natural gas shall be determined through stack testing in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 18, 25, or 25A.

m. Emission Limitation:

31.64 tons/year VOC, as a rolling, 12-month summation combined from units P001, P002, P003 and P004

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in d)(7) and shall be determined through a summation of the VOC emissions from the burning of natural gas and No. 2 fuel oil as follows:

i. The monthly VOC emissions from the burning of natural gas shall be determined by multiplying the average emissions in lb VOC/hour while burning natural gas derived from the most recent stack test by the operating hours for the month while burning natural gas, and dividing by 2,000 lbs/ton.

ii. The monthly VOC emissions from the burning of No. 2 fuel oil shall be determined by multiplying the average emissions in lb VOC/hour while burning No. 2 fuel oil derived from the stack test conducted in accordance with f)(2) by the operating hours for the month while burning No. 2 fuel oil, and dividing by 2,000 lbs/ton.

iii. The combined rolling, 12-month summation of the VOC emissions for emissions units P001, P002, P003 and P004 shall be the sum of f)(1)m.i and f)(1)m.ii above for each emissions unit for the rolling, 12-month period.

n. Emission Limitation:

0.000610 lb formaldehyde/mmBtu actual heat input

Applicable Compliance Method:

If required, compliance with the allowable emissions limit while burning natural gas shall be determined through stack testing in accordance with USEPA Method SW846.

When firing No. 2 fuel oil, compliance shall be based upon the AP-42 Table 3.1-4 (4/00) emission factor of 0.00028 lb formaldehyde/mmBtu.

o. Emission Limitation:

5.11 tons/year formaldehyde, as a rolling, 12-month summation combined from units P001, P002, P003 and P004

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in d)(7) and shall be determined through a summation of the formaldehyde emissions from the burning of natural gas and No. 2 fuel oil as follows:

i. The monthly formaldehyde emissions from the burning of natural gas shall be determined by multiplying the average emissions in lb formaldehyde/mmBtu while burning natural gas derived from the most recent stack test by the actual heat input of this emissions unit for the month while burning natural gas, divided by 2,000 lbs/ton.

ii. The monthly formaldehyde emissions from the burning of No.2 fuel oil shall be determined by multiplying the AP-42 Table 3.1-4 (4/00) of 0.00028 lb formaldehyde/mmBtu while burning No. 2 fuel oil by the actual heat input of this emissions unit for the month while burning No. 2 fuel oil, divided by 2,000 lbs/ton.

iii. The combined rolling, 12-month summation of the formaldehyde emissions for emissions units P001, P002, P003 and P004 shall be the sum of f)(1)o.i and f)(1)o.ii above for each emissions unit for the rolling, 12-month period.

p. Emission Limitation:

20% opacity, as a six-minute average

Applicable Compliance Method:

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

q. Emission Limitation:

0.05% sulfur, by weight, of the No. 2 fuel oil

Applicable Compliance Method:

Compliance shall be based upon fuel oil sampling as specified in d)(3), d)(4), and d)(5).

r. Emission Limitations:

10,016 hours of operation, as a rolling, 12-month summation while burning natural gas

4,216 hours of operation, as a rolling, 12-month summation while burning No. 2 fuel oil

1.2 hours of operation of natural gas may be added for every hour No. 2 fuel oil is not burned, with total natural gas operation not to exceed 15,020 hours as a rolling, 12-month summation.

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in d)(7).

(2) Upon initial use of fuel oil, the permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing shall be conducted within 60 days after initiating fuel oil firing in this emissions unit.

b. The emission testing shall be conducted to demonstrate compliance with the particulates/PM_{10}, NO_X, CO, VOC, and sulfuric acid mist emission rates.

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for particulates/PM_{10}, Methods 1 through 5 of 40 CFR Part 60, Appendix A and 40 CFR Part 51, Appendix M, Method 201 or 201A and 202; for NO_X, Methods 1 through 4 and 7 or 7E of 40 CFR Part 60, Appendix A; for CO, Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A; for VOC, Methods 1 through 4 and 18, 25, or 25A of 40 CFR Part 60, Appendix A; for formaldehyde, Method SW846; for sulfuric acid mist, Methods 1 through 4 and 8 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from RAPCA.

** the permittee has requested that if the average emission rate (lbs/hour) derived from the stack test conducted in accordance with this terms is less than the permit VOC allowable listed in term b)(1)e, it may apply for an air permit to install modification to increase the hours of operation. The permittee realizes that this modification might trigger the requirement to secure either an administrative or a new air permit to install.

Not later than 60 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Regional Air Pollution Control Agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s).

Failure to submit such notification for review and approval prior to the test(s) may result in the Regional Air Pollution Control Agency's refusal to accept the results of the emission test(s).

Personnel from the Regional Air Pollution Control Agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Regional Air Pollution Control Agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Regional Air Pollution Control Agency.

g) Miscellaneous Requirements

(1) If continuous CO and NO_X monitoring system is used to determine compliance with the allowable emissions limitations above, the quality assurance/quality control plan for the continuous NO_X and CO monitoring systems required pursuant to 40 CFR Part 75, Appendix B must be made available during scheduled inspections and upon request by the Ohio EPA and/or Regional Air Pollution Control Agency.

(2) If a continuous monitoring system in compliance with 40 CFR 75.19 is used to determine compliance with the allowable emissions limitations above, the quality assurance/quality control plan required pursuant to 40 CFR Part 75.19(e)(5) must be made available during scheduled inspections and upon request by the Ohio EPA and/or Regional Air Pollution Control Agency.

(3) The requirements of this permit supercede the requirements of PTI 08-04153 issued March 7, 2006 (corrected copy issued May 18, 2006) and represent a 0.81 ton per year decrease in formaldehyde emissions.