



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

9/10/2010

Janet Brumbelow
MODEL LFG POWER STATION
3322 West End Ave.
Ste 215
Nashville, TN 37203

RE: FINAL AIR POLLUTION PERMIT-TO-INSTALL AND OPERATE

Facility ID: 0125002421
Permit Number: P0106666
Permit Type: Renewal
County: Franklin

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	SYNTHETIC MINOR TO AVOID TITLE V
No	FEDERALLY ENFORCABLE PTIO (FEPTIO)

Dear Permit Holder:

Enclosed please find a final Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very 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 pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Kevin Boyce," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

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

If you have any questions, please contact Ohio EPA DAPC, Central District Office at (614)728-3778 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. This permit can be accessed electronically on the DAPC Web page, www.epa.ohio.gov/dapc, by clicking the "Issued Air Pollution Control Permits" link.

Sincerely,

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

Cc: Ohio EPA-CDO



FINAL

**Division of Air Pollution Control
Permit-to-Install and Operate
for
MODEL LFG POWER STATION**

Facility ID: 0125002421
Permit Number: P0106666
Permit Type: Renewal
Issued: 9/10/2010
Effective: 9/10/2010
Expiration: 9/10/2020



Division of Air Pollution Control
Permit-to-Install and Operate
for
MODEL LFG POWER STATION

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Authorization

Facility ID: 0125002421

Application Number(s): A0039682

Permit Number: P0106666

Permit Description: Administrative modification for the operation of two 14 mmBtu/hr IC engines using landfill gas for fuel, correcting the emission limitation for VOCs from OCs and permitting the replacement of engines with like engines if necessary (such as catastrophic failure).

Permit Type: Renewal

Permit Fee: \$0.00

Issue Date: 9/10/2010

Effective Date: 9/10/2010

Expiration Date: 9/10/2020

Permit Evaluation Report (PER) Annual Date: Jan 1 - Dec 31, Due Feb 15

This document constitutes issuance to:

MODEL LFG POWER STATION
3299 JACKSON PIKE
Grove City, OH 43123

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:

Ohio EPA DAPC, Central District Office
50 West Town Street, 6th Floor
P.O. Box 1049
Columbus, OH 43216-1049
(614)728-3778

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency



Chris Korleski
Director



Authorization (continued)

Permit Number: P0106666
Permit Description: Administrative modification for the operation of two 14 mmBtu/hr IC engines using landfill gas for fuel, correcting the emission limitation for VOCs from OCs and permitting the replacement of engines with like engines if necessary (such as catastrophic failure).

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

Group Name: 14 mmBtu/hr IC engines

Emissions Unit ID:	P001
Company Equipment ID:	GM1
Superseded Permit Number:	01-8060
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	P002
Company Equipment ID:	GM2
Superseded Permit Number:	01-8060
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

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

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

2. Who is responsible for complying with this permit?

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

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

3. What records must I keep under this permit?

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

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

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

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

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

- Annual emissions fee. Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. Unless otherwise specified, facilities subject to one or more synthetic minor restrictions must use Ohio EPA's "Air Services" to submit annual emissions associated with this permit requirement. 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 Ohio EPA DAPC, Central District Office 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 submitting¹ 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 emissions unit once the certification has been submitted to Ohio EPA by the authorized official.

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

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

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

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

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

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated

¹ Permittees that use Ohio EPA's "Air Services" can mark the affected emissions unit(s) as "permanently shutdown" in the facility profile along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

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

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

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
 - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
 - (1) None.
 - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
 - (1) None.
2. The Ohio EPA has determined that this facility may be applicable to the requirements of an area source MACT/GACT rule that the Ohio EPA does not have the delegated authority to implement. Although Ohio EPA has determined that an area source MACT (also known as the GACT) may apply, at this time Ohio EPA does not have the authority to enforce this standard. Instead, U.S. EPA has the authority to enforce this standard. Please be advised that all requirements associated with these rules are in effect and are enforceable by U.S. EPA. For more information on the area source rules, please refer to the follow U.S. EPA website: <http://www.epa.gov/ttn/atw/area/arearules.html>

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - 14 mmBtu/hr IC engines: P001, P002,

EU ID	Operations, Property and/or Equipment Description
P001	14 mmBtu/hr IC Engine #1, for combustion of landfill gas to produce electricity
P002	14 mmBtu/hr IC Engine #2 , for combustion of landfill gas to produce electricity

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. c)(1), c)(2), d)(2), e)(3),

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(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 are identified below. 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 3745-31-05(A)(3)	0.026 lb particulate emissions (PE) /mmBtu, actual heat input [0.37 lb/hr and 1.63 ton/yr of PE] 0.42 lb oxides of nitrogen (NOx)/mmBtu, actual heat input [5.84 lb/hr and 25.6 tons/yr of NOx] 0.44 lb carbon monoxide (CO)/mmBtu, actual heat input [6.10 lb/hr and 26.7 tons/yr of CO] 0.014 lb sulfur dioxide (SO ₂)/mmBtu, actual heat input [0.20 lb/hr and 0.89 ton/yr of SO ₂] 0.44 lb organic compounds (OC)/mmBtu, actual heat input [6.15 lb/hr and 26.94 tons/yr of OC]

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		0.05 lb non-methane organic compounds (NMOC)/mmBtu, actual heat input [0.68 lb/hr and 2.97 tons/yr of NMOC] See b)(2)a. and b)(2)b.
b.	OAC 3745-17-07(A)(1)	Visible particulate emissions (PE) shall not exceed 20% opacity, as a six-minute average, except as provided by rule
c.	OAC 3745-17-11(B)(5)	The emissions limitation established by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC 3745-18-06(G)	The emissions limitation established by this rule is less stringent than the emissions limitation established pursuant to OAC rule 3745-31-05(A)(3).
e.	OAC 3745-76	See b)(2)d.
f.	40 CFR 60.30c – 36c	See b)(2)d.
g.	40 CFR 63.1930 – 1990 (40 CFR 63 Subpart AAAAA)	See b)(2)e.

(2) Additional Terms and Conditions

- a. The requirements of this rule also includes compliance with the requirements of 40 CFR Part 60, Subpart Cc, 40 CFR Part 63, Subpart AAAAA, and OAC rule 3745-17-11(B)(5)(b).
- b. The "Best Available Technology" (BAT) control requirement for this emissions unit has been determined to be the use of "lean burn technology". BAT requirements also include compliance with the terms and conditions of this permit.
- c. The following term and condition addresses the requirements for replacing emissions unit P001 and/or P002 (IC Engine #1 and/or IC Engine #2) due to unforeseen circumstances (i.e. catastrophic failure) which result in the existing engine being inoperable:
 - i. the replacement engine must be manufactured by Deutz or MWM with a model of TBG 620 V16 K (Deutz) or TCG 2020 V 16 K (MWM), and have the same emissions factors as the existing engine.
 - ii. the replacement engine must not increase the rated capacity, production rate, or throughput of the existing engine.
 - iii. the permittee shall notify the Ohio EPA Central District Office when an engine replacement is necessary. This notification will be in writing and

must be within five day of the determination that an engine replacement is necessary due to the inoperative state of the existing engine;

- iv. the permittee shall submit the written notification requested in Section e)(5);
 - v. the replacement engine must comply with all of the terms and conditions of this permit;
 - vi. the Model Landfill Gas Power Station may install and operate only 2 engines at this facility;
 - vii. if the permittee installs an engine that was manufactured after July 1, 2007, this engine will be subject to the requirements of 40 CFR Subpart JJJJ [see d)(2), e)(4).];
 - viii. if the permittee does not operate and maintain a certified stationary SI internal combustion engine and control device according to the manufacturer’s emission-related written instructions, that engine will be considered a non-certified engine. [See f)(2).]
 - ix. if the permittee installs an engine that was manufactured after July 1, 2007, pursuant to 40 CFR Part 63.6590(c), this engine must meet the requirements of 40 CFR Part 60.4230 – 60.4248 to be in compliance with 40 CFR Part 63, Subpart ZZZZ. No other requirements under 40 CFR Part 63, Subpart ZZZZ apply to this emissions unit.
- d. The permittee shall operate their gas collection and control system in accordance with OAC 3745-76.
- e. The permittee shall comply with the applicable compliance standards required under 40 CFR Part 63, Subpart AAAA including the following sections:

a.	63.1935(a)(3)	Existing Affected Sources
b.	63.1945(f) 63.1955(b)	Compliance requirements for Existing, Area Sources
c.	Appendix, Table 1	Applicable General Provisions

c) Operational Restrictions

- (1) The permittee shall calibrate, maintain and operate, according to the manufacturer’s specifications, a device at the inlet to the combustion engine which completely shuts off gas flow to the engine when the engine is not operating.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:
- a. the color of the emissions;
 - b. whether the emissions are representative of normal operations;
 - c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - d. the total duration of any visible emissions incident; and
 - e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emissions incident has occurred. The observer does not have to document the exact start and end times for the visible emissions incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emissions incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

- (2) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart AAAAA, including the following sections:

a.	63.1945(b)	Initial Compliance by January 16, 2004
b.	63.1960	Compliance Methods
c.	63.1965	Deviation Clarifications for SSM Plans and Control Device Operating Parameters
d.	63.1975	Calculating 3-hour Block Average for Control Device Operating Parameters
e.	63.1980(a)(b)	Required Records

e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal; or they may be mailed as a hard copy to 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.
- (3) The permittee shall submit semiannual reports and such other notifications and reports to the Ohio EPA Central District Office as are required pursuant to 40 CFR Part 63, Subpart AAAA, per the following sections:

a.	63.1980	Semi-Annual Reporting Requirements
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- (4) In the event of a catastrophic failure of the one of the existing engines, the permittee must submit a written statement to the Ohio EPA Central District Office. The statement must be submitted within 30 days of the installation of the replacement engine and shall include the following information:
 - a. The manufacture date for the replacement engine.
 - b. The manufacturer, model number and serial number for the replacement engine.
 - c. The installation and startup dates for the replacement engine.
 - d. An affirmation from the permittee, that the replacement engine will be operated in compliance with the terms and conditions of this permit.

f) Testing Requirements

- (1) Compliance with the emission limitations in Section b)(1) of the terms and condition of this permit shall be determined in accordance with the following methods

- a. Emission Limitation:
0.37 lb particulate emissions (PE) per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable PE emission limitation by testing in accordance with Methods 1 – 5 of 40 CFR Part 60, Appendix A.

[The permittee had conducted U.S. EPA Method 5 on stack emissions and submitted a comprehensive written report demonstrating compliance with the emissions limitation to Ohio EPA Central District Office on February 25, 2010.]

- b. Emission Limitation:
1.63 tons of particulate emissions (PE) per year

Applicable Compliance Method:

The annual PE emission limitation is based upon the hourly emission rate multiplied by the conversion factor of 8,760 hours per year and 1 ton per 2,000 pounds. Therefore, if compliance is shown with the hourly limitation, compliance with the annual limitation will be assumed.

- c. Emission Limitation:
5.84 lbs oxides of nitrogen (NOx) per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable NOx emission limitation by testing in accordance with Method 7 of 40 CFR Part 60, Appendix A.

[The permittee had conducted U.S. EPA Method 7 on stack emissions and submitted a comprehensive written report demonstrating compliance with the emissions limitation to Ohio EPA Central District Office on February 25, 2010.]

- d. Emission Limitation:
25.6 tons of oxides of nitrogen (NOx) per year

Applicable Compliance Method:

The annual NOx emission limitation is based upon the hourly emission rate multiplied by the conversion factor of 8,760 hours per year and 1 ton per 2,000 pounds. Therefore, if compliance is shown with the hourly limitation, compliance with the annual limitation will be assumed.

- e. Emission Limitation:
6.10 lb of carbon monoxide (CO) per hour

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the hourly allowable CO emission limitation by testing in accordance with Method 10 of 40 CFR Part 60, Appendix A.

[The permittee had conducted U.S. EPA Method 10 on stack emissions and submitted a comprehensive written report demonstrating compliance with the emissions limitation to Ohio EPA Central District Office on February 25, 2010.]

- f. Emission Limitation:
26.7 tons of carbon monoxide (CO) per year

Applicable Compliance Method:

The annual CO emission limitation is based upon the hourly emission rate multiplied by the conversion factor of 8,760 hours per year and 1 ton per 2,000 pounds. Therefore, if compliance is shown with the hourly limitation, compliance with the annual limitation will be assumed.

- g. Emission Limitation:
0.20 lb of sulfur dioxide (SO₂) per hour
- Applicable Compliance Method:
Compliance with the hourly limitation shall be demonstrated by multiplying the AP-42 emission factor of 7.786 lb SO₂/mmscf (Section 2.4.4.2 (November 1998)) by the maximum inlet gas flow of 0.02612 mmscf/hr.
- h. Emission Limitation:
0.89 ton of sulfur dioxide (SO₂) per year
- Applicable Compliance Method:
The annual SO₂ emission limitation is based upon the hourly emission rate multiplied by the conversion factor of 8,760 hours per year and 1 ton per 2,000 pounds.
- i. Emission Limitation:
6.15 lb of organic compounds (OC) per hour
- Applicable Compliance Method:
If required, the permittee shall demonstrate compliance with the hourly allowable OC emission limitation by testing in accordance with Method 25 or Method 25A of 40 CFR Part 60, Appendix A.
- [The hourly limitation was established at 110% of the highest measured one-hour concentration during the U.S. EPA Method 25A test performed on January 28, 2010. A written report with the emission rate was submitted to Ohio EPA Central District Office on February 25, 2010.]
- j. Emission Limitation:
26.94 tons of organic compounds (OC) per year
- Applicable Compliance Method:
The annual OC emission limitation is based upon the hourly emission rate multiplied by the conversion factor of 8,760 hours per year and 1 ton per 2,000 pounds. Therefore, if compliance is shown with the hourly limitation, compliance with the annual limitation will be assumed.
- k. Emission Limitation:
0.68 lb of non-methane organic compounds (NMOC) per hour
- Applicable Compliance Method:
The permittee shall demonstrate compliance with the hourly allowable NMOC emission limitation by testing in accordance with Methods 18, 25, or 25A , as appropriate, of 40 CFR Part 60, Appendix A.
- [The permittee had conducted U.S. EPA Method 18 on stack emissions and submitted a comprehensive written report demonstrating compliance with the emissions limitation to Ohio EPA Central District Office on February 25, 2010.]

- I. Emission Limitation:
2.97 tons of non-methane organic compounds (NMOC) per year

Applicable Compliance Method:

The annual NMOC emission limitation is based upon the hourly emission rate multiplied by the conversion factor of 8,760 hours per year and 1 ton per 2,000 pounds. Therefore, if compliance is shown with the hourly limitation, compliance with the annual limitation will be assumed.

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

Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

- (2) If a non-certified engine is installed at the facility, and the engine was manufactured after July 1, 2007, the permittee shall conduct emission testing for this emissions unit in accordance with the following requirements:

- a. The emissions testing shall be conducted within one year of engine startup and conduct subsequent performance testing every 8,760 hours of operation or 3 years, whichever comes first, thereafter to demonstrate compliance.
- b. The emission testing shall be conducted to demonstrate compliance with the following limits:
- i. the mass emission limitations of 5.84 lbs NO_x/hr, 12.4 lbs CO/hr and 0.68 lb NMOC/hr.
- c. The following test methods shall be employed to demonstrate compliance with the above emission limitations:
- i. Methods 1 - 4 of 40 CFR Part 60, Appendix A;
- ii. for NO_x - Method 7 of 40 CFR Part 60, Appendix A;
- iii. for CO - Method 10 of 40 CFR Part 60, Appendix A;
- iv. for NMOC - Methods 18, 25, or 25A , as appropriate, of 40 CFR Part 60, Appendix A.

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

- d. The tests shall be conducted while this emissions unit is operating at its maximum capacity and meet the testing requirements in 40 CFR 60.4244, unless otherwise specified or approved by the Ohio EPA, Division of Air Pollution Control. Not later than 30 days prior to the proposed test date(s), the permittee

shall submit an "Intent to Test" notification to the Ohio EPA, Division of Air Pollution Control. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the times and dates of the tests, and the person(s) who will be conducting the tests. Failure to submit such notification for review and approval prior to the tests may result in the Ohio EPA District Office's air agency's refusal to accept the results of the emissions tests.

- e. Personnel from the Ohio EPA District Office's air agency shall be permitted to witness the test, 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 unit and/or the performance of the control equipment. A comprehensive written report on the emissions tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Division of Air Pollution Control within 60 days following completion of the tests.

g) **Miscellaneous Requirements**

- (1) Modeling to demonstrate compliance with, the "Toxic Air Contaminant Statute", ORC 3704.03(F)(4)(b), was not necessary because the emissions unit's maximum annual emissions for each toxic air contaminant, as defined in OAC rule 3745-114-01, will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by OAC rule 3745-31-01. The permittee is hereby advised that changes in the composition of the materials, or use of new materials, that would cause the emissions of any toxic air contaminant to increase to above 1.0 ton per year may require the permittee to apply for and obtain a new permit to install.