



Environmental  
Protection Agency

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

7/11/2011

Randy Meyer  
OMEGA JV5 Wadsworth Station  
1111 Schrock Road, Suite 100  
COLUMBUS, OH 43229

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

Facility ID: 1652100085  
Permit Number: P0108196  
Permit Type: Renewal  
County: Medina

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install and Operate (PTIO) for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio EPA Weekly Review and the local newspaper, Medina County Gazette. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

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

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

Sincerely,

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

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

Certified Mail

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





## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

American Municipal Power (AMP) - OMEGA JV5 Wadsworth Station is a municipal power generating facility located in Medina County consisting of:

EU ID	Operations, Property and/or Equipment Description	Installation Date
B001	Caterpillar model 3516A, large stationary internal combustion (17.5 MMBtu/hr) diesel engine (2568 BHP) electric generating unit (1800 kW). Company ID: WA-1	12/01/1994
B002	Caterpillar model 3516A, large stationary internal combustion (17.5 MMBtu/hr) diesel engine (2568 BHP) electric generating unit (1800 kW). Company ID: WA-2	12/01/1994
B003	Caterpillar model 3516A, large stationary internal combustion (17.5 MMBtu/hr) diesel engine (2568 BHP) electric generating unit (1800 kW). Company ID: WA-3	12/01/1994

3. Facility Emissions and Attainment Status:

AMP – OMEGA JV5 Wadsworth Station has the potential to emit over 754 tons of nitrogen oxides (NO<sub>x</sub>) per year. All other air pollutants are below Title V thresholds. Medina County is nonattainment for ozone, and fine particulate matter with an aerodynamic diameter of 2.5 microns or less (PM<sub>2.5</sub>).

4. Source Emissions:

This permit limits the facility-wide NO<sub>x</sub> emissions to 99.9 tons per rolling, 12-month period. The permittee has agreed to federally enforceable restrictions on operating hours and diesel fuel consumption in order to avoid Title V permitting status. Each emissions unit is limited to 1161 hours and 144,777 gallons of fuel, per rolling, 12-month period.

5. Conclusion:

Compliance with the rolling, 12-month operating restrictions and corresponding emissions limitations, along with the associated recordkeeping and reporting requirements in the permit, will ensure the facility remains a synthetic minor source, through OAC rule 3745-31-05(D), with respect to NO<sub>x</sub> emissions. Issuance of federally enforceable permit to install and operate (FEPTIO) P0108196 is recommended.

6. Please provide additional notes or comments as necessary:

None.

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

<u>Pollutant</u>	<u>Tons Per Year</u>
NO <sub>x</sub>	99.90
CO	8.13
SO <sub>2</sub>	3.05
VOC	3.05
PE	0.63

PUBLIC NOTICE  
Issuance of Draft Air Pollution Permit-To-Install and Operate  
OMEGA JV5 Wadsworth Station

Issue Date: 7/11/2011  
Permit Number: P0108196  
Permit Type: Renewal  
Permit Description: Renewal permit for three 17.5 MMBtu/hr diesel-fired electric generators.  
Facility ID: 1652100085  
Facility Location: OMEGA JV5 Wadsworth Station  
975 Airport Drive,  
Wadsworth, OH 44281  
Facility Description: Fossil Fuel Electric Power Generation

The Director of the Ohio Environmental Protection Agency, 50 West Town Street, Columbus Ohio has issued a draft action of an air pollution control, federally enforceable permit-to-install and operate (PTIO) for the facility at the location identified above on the date indicated. Comments concerning this draft action, or a request for a public meeting, must be sent in writing no later than thirty (30) days from the date this notice is published. All comments, questions, requests for permit applications or other pertinent documentation, and correspondence concerning this action must be directed to Kelly Kanoza at Akron Regional Air Quality Management District, 146 South High Street, Room 904, Akron, OH 44308 or (330)375-2480. The permit can be downloaded from the Web page: [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc)





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install and Operate  
for  
OMEGA JV5 Wadsworth Station**

Facility ID:	1652100085
Permit Number:	P0108196
Permit Type:	Renewal
Issued:	7/11/2011
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





Division of Air Pollution Control
Permit-to-Install and Operate
for
OMEGA JV5 Wadsworth Station

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## Authorization

Facility ID: 1652100085

Application Number(s): A0041775

Permit Number: P0108196

Permit Description: Renewal permit for three 17.5 MMBtu/hr diesel-fired electric generators.

Permit Type: Renewal

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

Issue Date: 7/11/2011

Effective Date: To be entered upon final issuance

Expiration Date: To be entered upon final issuance

Permit Evaluation Report (PER) Annual Date: To be entered upon final issuance

This document constitutes issuance to:

OMEGA JV5 Wadsworth Station  
975 Airport Drive  
Wadsworth, OH 44281

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

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

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

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

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0108196

Permit Description: Renewal permit for three 17.5 MMBtu/hr diesel-fired electric generators.

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

**Group Name: Diesel Generators**

<b>Emissions Unit ID:</b>	<b>B001</b>
Company Equipment ID:	WA1
Superseded Permit Number:	P0101888
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B002</b>
Company Equipment ID:	WA2
Superseded Permit Number:	P0101888
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B003</b>
Company Equipment ID:	WA3
Superseded Permit Number:	P0101888
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 Akron Regional Air Quality Management District in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

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

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

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

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

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. "Shut down" means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting<sup>1</sup> 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.

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<sup>1</sup>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).

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

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

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

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

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

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

## **B. Facility-Wide Terms and Conditions**

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

OMEGA JV5 Wadsworth Station

**Permit Number:** P0108196

**Facility ID:** 1652100085

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

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).
  - a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.
    - (1) None.
  - b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.
    - (1) The Ohio EPA has determined that this facility is subject to the requirements of 40 CFR Part 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (Area Source RICE MACT). Although Ohio EPA has determined that this area source MACT (also known as the GACT) applies, 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 this rule are in effect and shall be enforced 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 - Diesel Generators: B001, B002, B003,**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
B001	Caterpillar model 3516A, large stationary internal combustion (17.5 MMBtu/hr) diesel engine (2568 BHP) electric generating unit (1800 kW). Company ID: WA-1
B002	Caterpillar model 3516A, large stationary internal combustion (17.5 MMBtu/hr) diesel engine (2568 BHP) electric generating unit (1800 kW). Company ID: WA-2
B003	Caterpillar model 3516A, large stationary internal combustion (17.5 MMBtu/hr) diesel engine (2568 BHP) electric generating unit (1800 kW). Company ID: WA-3

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

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

a. None.

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

a. b)(1)b., b)(2)c., c)(1), c)(2), d)(1), d)(2), e)(2), and f)(1)f.

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.

	<b>Applicable Rules/Requirements</b>	<b>Applicable Emissions Limitations/Control Measures</b>
a.	OAC rule 3745-31-05(A)(3), PTI 16-01366 issued 12/07/1994	0.062 pound of particulate emissions per million British thermal unit (0.062 lb PE/MMBtu), 1.09 lbs PE/hr and 0.63 ton PE/yr. See b)(2)a.  0.30 pound of sulfur dioxide per million Btu (0.30 lb SO <sub>2</sub> /MMBtu), 5.25 lbs SO <sub>2</sub> /hr and 3.05 tons SO <sub>2</sub> /yr. See b)(2)a.  0.80 pound of carbon monoxide per million Btu (0.80 lb CO/MMBtu), 14.0 lbs CO/hr and 8.13 tons CO/yr. See b)(2)a.  0.30 pound of volatile organic compounds per million Btu (0.30 lb VOC/MMBtu), 5.25

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

OMEGA JV5 Wadsworth Station

**Permit Number:** P0108196

**Facility ID:** 1652100085

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		lbsVOC/hr and 3.05 tons VOC/yr. See b)(2)a.  10.14 grams of nitrogen oxides per horsepower-hour (10.14 g NO <sub>x</sub> /hp-hr) and 57.40 lbs NO <sub>x</sub> /hr  Visible PE from the exhaust stack serving this emissions unit shall not exceed 5% opacity as a 6-minute average. See b)(2)b.
b.	OAC rule 3745-31-05(D), Synthetic Minor to avoid Title V	Facility-wide NO <sub>x</sub> emissions shall not exceed 99.9 tons per rolling, 12-month period. See b)(2)c., c)(1) and c)(2)
c.	OAC rule 3745-17-07(A)	See b)(2)d.
d.	OAC rule 3745-17-11(B)(5)(b)	0.062 lb PE/MMBtu of actual heat input
e.	OAC rule 3745-18-06(G)	See b)(2)d.
f.	OAC rule 3745-110-03(F)	Exempt. See b)(2)e.

(2) Additional Terms and Conditions

- a. The hourly emission limitations are greater than or equal to the potentials to emit for each emissions unit, as determined from the application. Therefore, no associated monitoring, record keeping, or reporting requirements is necessary to ensure ongoing compliance with these emission limitations.
- b. Visible PE shall not exceed 5% opacity, as a 6-minute average, except for a 1-hour period during start-up of the engine. Visible PE during this 1-hour start-up period shall not exceed 20% opacity, as a 6-minute average.
- c. The facility-wide NO<sub>x</sub> emissions shall not exceed 99.9 tons per year, based upon a rolling, 12-month summation of the monthly NO<sub>x</sub> emissions from emissions units B001, B002, and B003, combined. This federally enforceable limitation is based on the maximum annual operating hours and diesel fuel usage restrictions under c)(1) and c)(2) of this permit, and is being established for the purposes of avoiding Title V major source applicability.  
  
These emissions units have been in operation for more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summations of operating hours and diesel fuel usage upon issuance of this permit.
- d. The emission control requirements of this rule are less stringent than those established pursuant to OAC rule 3745-31-05(A)(3).

- e. Pursuant to OAC rule 3745-110-03(J)(20), the requirements of this rule shall not apply to any affected source whose utilization is less than ten percent of its capacity factor on an annual average basis over a three-year rolling period and less than twenty percent of its capacity factor in any year of the three-year rolling period.

c) Operational Restrictions

- (1) The maximum annual operating hours for each emissions unit shall not exceed 1161 hours, based upon a rolling, 12-month summation of operating hours.
- (2) The maximum annual diesel fuel oil usage for each emissions unit shall not exceed 144,777 gallons, based upon a rolling, 12-month summation of fuel oil usage.
- (3) The permittee shall burn only low sulfur diesel fuel, containing less than 0.05% sulfur, by weight, in these emissions units.
- (4) The engine of each emissions unit shall be equipped with a timer for recording the hours of operation.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall record the following information each month for each emissions unit:
  - a. the total operating time, in hours;
  - b. the rolling, 12-month summation of the monthly operating time, in hours;
  - c. the total diesel fuel usage, in gallons; and
  - d. the rolling, 12-month summation of the monthly fuel usage rate, in gallons.
- (2) The permittee shall record the following information each month for emissions units B001, B002, and B003, combined:
  - a. the total NO<sub>x</sub> emissions, in tons; and
  - b. the rolling, 12-month summation of NO<sub>x</sub> emissions, in tons.
- (3) For each day a fuel other than the low-sulfur diesel fuel specified in c)(3) is burned, the permittee shall maintain a record of the type and quantity of fuel burned in these emissions units.
- (4) The permittee shall maintain records of the fuel oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below:
  - a. Alternative 1:

For each shipment of oil received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil

supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate, in lbs/MMBtu. The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745 18 04(F)(2). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate, in lbs/MMBtu. The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745 18 04(F)(2).

- (5) At a minimum, annually, the permittee shall perform, or require the supplier to perform, the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director (appropriate Ohio EPA District Office or local air agency). The results of these analyses must be maintained in the facility's files for a period of not less than five years.

e) Reporting Requirements

- (1) The reports contained in this permit shall be submitted in accordance with the reporting requirements specified in Part 1 - General Terms and Conditions, Section A of this permit. Unless other arrangements have been approved by the Director (appropriate Ohio EPA District Office or local air agency), all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify:
- a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

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

OMEGA JV5 Wadsworth Station

**Permit Number:** P0108196

**Facility ID:** 1652100085

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

- i. all exceedances of the rolling, 12-month restriction on the hours of operation for each emissions unit;
- ii. all exceedances of the rolling, 12-month restriction on the fuel oil usage for each emissions unit;
- iii. all exceedances of the rolling, 12-month emission limitation for NO<sub>x</sub>;
- b. the probable cause of each deviation (excursion);
- c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and
- d. the magnitude and duration of each deviation (excursion).

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

The quarterly reports shall be submitted, electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

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

The permittee shall include the following information in the annual PER:

- a. any time an emissions unit's utilization is greater than or equal to ten percent of its capacity factor on an annual average basis over a three-year rolling period, or greater than or equal to twenty percent of its capacity factor in any year of the three-year rolling period; and
- b. any day a fuel other than the low-sulfur diesel fuel specified in c)(3) is burned in these emissions units.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

0.062 lb PE/MMBtu actual heat input

1.09 lbs PE/hr and 0.63 ton PE/yr

Control Measure:

Compliance with the hourly PE limitation identified above shall be demonstrated by multiplying the emission limitation of 0.062 lb PE/MMBtu actual heat input by the emissions unit's maximum rated heat input capacity of 17.5 MMBtu/hr.

If required, the permittee shall demonstrate compliance with the hourly PE limit based on the results of emission testing conducted in accordance with OAC rule 3745-17-03(B)(10) and Methods 1- 5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by multiplying the hourly allowable emission limitation by the annual operating restriction of 1,161 hrs/yr, and a conversion factor of 1 ton/2,000 lbs/ton. Therefore, compliance with the annual emission limitation shall be demonstrated provided compliance is maintained with the hourly limit and the restriction on the annual number of hours of operation.

b. Emissions Limitations:

0.30 lb SO<sub>2</sub>/MMBtu actual heat input

5.25 lbs SO<sub>2</sub>/hr and 3.05 tons SO<sub>2</sub>/yr

Control Measure:

Compliance with the hourly SO<sub>2</sub> emission limitation identified above shall be demonstrated by multiplying the emission limitation of 0.30 lb SO<sub>2</sub>/MMBtu actual heat input by the emissions unit's maximum rated heat input capacity of 17.5 MMBtu/hr.

If required, the permittee shall demonstrate compliance with the hourly and lb/mmBtu SO<sub>2</sub> limitations based on the results of emission testing conducted in accordance with OAC rule 3745-08-04(F)(2) and Methods 1-4 and 6 of 40 CFR Part 60, Appendix A.

The annual emissions limit was established by multiplying the hourly allowable emissions limit by the annual operating restriction of 1,161 hrs/yr and a conversion factor of 1 ton/2,000 lbs/ton. Therefore, compliance with the annual emission limitation shall be demonstrated provided compliance is maintained with the hourly limit and the restriction on the annual number of hours of operation.

c. Emissions Limitations:

0.80 lb CO/MMBtu actual heat input

14.0 lbs CO/hr and 8.13 tons CO/yr

Control Measure:

Compliance with the hourly CO emission limitation identified above shall be demonstrated by multiplying the emission limitation of 0.80 lb CO/MMBtu actual heat input by the emissions unit's maximum rated heat input capacity of 17.5 MMBtu/hr.

If required, the permittee shall demonstrate compliance with the hourly and lb/mmBtu CO limitations based on the results of emission testing conducted in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

The annual emissions limit was established by multiplying the hourly allowable emissions limit by the annual operating restriction of 1,161 hrs/yr and a conversion factor of 1 ton/2,000 lbs/ton. Therefore, compliance with the annual emission limitation shall be demonstrated provided compliance is maintained with the hourly limit and the restriction on the annual number of hours of operation.

d. Emissions Limitations:

0.30 lb VOC/MMBtu actual heat input

5.25 lbs VOC/hr and 3.05 tons VOC/yr

Control Measure:

Compliance with the hourly VOC emission limitation identified above shall be demonstrated by multiplying the emission limitation of 0.30 lb VOC/MMBtu actual heat input by the emissions unit's maximum rated heat input capacity of 17.5 MMBtu/hr.

If required, the permittee shall demonstrate compliance with the hourly and lb/mmBtu VOC limitations based on the results of emission testing conducted in accordance with Methods 1-4 and 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A.

The annual emissions limit was established by multiplying the hourly allowable emissions limit by the annual operating restriction of 1,161 hrs/yr and a conversion factor of 1 ton/2,000 lbs/ton. Therefore, compliance with the annual emission limitation shall be demonstrated provided compliance is maintained with the hourly limit and the restriction on the annual number of hours of operation.

e. Emissions Limitations:

10.14 g NO<sub>x</sub>/hp-hr and 57.40 lbs NO<sub>x</sub>/hr

Control Measure:

Compliance with the hourly NO<sub>x</sub> emission limitation identified above shall be demonstrated by multiplying 10.14 g NO<sub>x</sub>/hp-hr by the emissions unit's maximum rated output of 2568 hp and a conversion factor of 1 lb/453.59 g.

If required, the permittee shall demonstrate compliance with the hourly and g/hp-hr NO<sub>x</sub> limitations based on the results of emission testing conducted in accordance with Methods 1-4 and 7E of 40 CFR Part 60, Appendix A.

f. Emissions Limitation:

Facility-wide NO<sub>x</sub> emissions shall not exceed 99.9 tons per rolling, 12-month period

Control Measure:

Compliance with the annual NO<sub>x</sub> emission limitation identified above shall be demonstrated by the monitoring and record keeping requirements in d).

g. Emissions Limitation:

Visible PE shall not exceed 5% opacity, as a 6-minute average

Visible PE shall not exceed 20% opacity as a 6-minute average during 1-hr start-up period

Control Measure:

Compliance with the stack visible PE limitations identified above shall be demonstrated through visible emissions observations performed in accordance with OAC rule 3745-17-03(B)(1) and Method 9 of 40 CFR Part 60, Appendix A.

g) Miscellaneous Requirements

- (1) Modeling to demonstrate compliance with the Ohio EPA's "Air Toxic Policy" was not necessary because the emissions units' maximum annual emissions for each toxic compound will be less than 1.0 ton per year. OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified federally enforceable permit-to-install and operate (FEPTIO) 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, which cause the emissions of any pollutant that has a listed TLV to increase above 1.0 ton per year may require the permittee to apply for and obtain a new permit.