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

11/6/2012

Certified Mail

John Hendricks
Robert P. Mone Plant
1 Riverside Plaza
Columbus, OH 43215-2373

Facility ID: 0381000043
Permit Number: P0111116
County: Van Wert

RE: DRAFT AIR POLLUTION TITLE V PERMIT
Permit Type: Renewal

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Times Bulletin. A copy of the public notice, the Statement of Basis, 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 by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. 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
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402

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 if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northwest District Office at (419)352-8461.

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*
Ohio EPA-NWDO; Michigan; Indiana

PUBLIC NOTICE
11/6/2012 Issuance of Draft Air Pollution Title V Permit

Robert P. Mone Plant
4406 Mentzer Road,
Convoy, OH 45832
Van Wert County
FACILITY DESC.: Fossil Fuel Electric Power Generation
PERMIT #: P0111116
PERMIT TYPE: Renewal
PERMIT DESC: Renewal Title V operating permit for a peaking station.

The Director of the Ohio Environmental Protection Agency issued the draft permit above. The permit and complete instructions for requesting information or submitting comments may be obtained at: http://epa.ohio.gov/dapc/permitsonline.aspx by entering the permit # or: Andrea Moore, Ohio EPA DAPC, Northwest District Office, 347 North Dunbridge Road, Bowling Green, OH 43402. Ph: (419)352-8461

Statement of Basis For Air Pollution Title V Permit

Facility ID:	0381000043
Facility Name:	Robert P. Mone Plant
Facility Description:	Peaking Station
Facility Address:	4406 Mentzer Road, Convoy, OH 45832
Permit #:	P0111116, Renewal

This facility is subject to Title V because it is major for:

☐ Lead ☐ Sulfur Dioxide ☒ Carbon Monoxide ☐ Volatile Organic Compounds ☒ Nitrogen Oxides
☐ Particulate Matter ≤ 10 microns ☐ Single Hazardous Air Pollutant ☐ Combined Hazardous Air Pollutants
☐ Maximum Available Control Technology Standard(s) ☐ GHG ☐ Title IV

A. Standard Terms and Conditions

Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(U)?	Yes
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	no
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A

Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A
Please identify the affected unit(s) and pollutant(s) for which a Compliance Assurance Monitoring (CAM) Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.	N/A

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.1			Lists Facility wide terms and conditions that are enforceable under state law only.
B.2	3745-14; 3745-109		Lists the emissions units subject to the NOx budget Trading Program and Clean Air Interstate Rule (CAIR).

C. Emissions Unit Terms and Conditions

Key:
EU = emissions unit ID
ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit)
OR = operational restriction
M = monitoring requirements
ENF = did noncompliance issues drive the monitoring requirements?
R = record keeping requirements
Rp = reporting requirements
ET = emission testing requirements (not including compliance method terms)
St = streamlining term used to replace a PTI monitoring, record keeping, or reporting requirement with an equivalent or more stringent requirement
Misc = miscellaneous requirements

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
B001	0.0076 lb PE/MMBtu of actual heat input; 0.10 lb PE/hr; 0.40 ton PE/yr	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR – The permittee shall burn only natural gas in this emissions unit. ET – None required per engineering guide 16.
B001	0.96 lb CO/hr; 4.20 tons CO/yr	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR – The permittee shall burn only natural gas in this emissions unit. ET – None required per engineering guide 16.
B001	1.20 lbsNOx/hr; 5.30 tons NOx/yr	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	OR – The permittee shall burn only natural gas in this emissions unit. ET – None required per engineering guide 16.
B001	*Visible emission limitation	17-07(A)	N	N	N	Y	N	Y	Y	N	N	N	*Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule ET – M/R and Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings be conducted.
B001	None	17-10(B)	N	Y	N	N	N	N	N	N	N	N	ND – The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
B001	None	18-06	N	Y	N	N	N	N	N	N	N	N	ND – This emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A).
B001	None	N	40 CFR, Part 60, Subpart Dc	N	Y	Y	N	Y	Y	N	N	N	OR – The permittee shall burn only natural gas in this emissions unit. ET – No emission limitations were established pursuant to this rule.

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P001 P002 P003	9 ppmvdNOx at 15% oxygen (at full load, as a 1-hour average)*	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	Y	*When firing natural gas, during non-startup and shutdown operations OR – P001-P003 shall be operated at a minimum of 50% of full load except during startup and shutdown periods. These emissions units will only fire NG and No. 2 oil. The maximum sulfur content shall not exceed 0.007% by weight when burning NG and 0.05% by weight when burning No. 2 oil. ET – Compliance shall be demonstrated by the unbiased CEMs data. Misc – A written QA/QC plan for the CEMs system is required to ensure continuous valid and representative NOx readings.
P001 P002 P003	65 lbsNOx/hr*	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	Y	*When firing natural gas, during non-startup and shutdown operations OR – P001-P003 shall be operated at a minimum of 50% of full load except during startup and shutdown periods. These emissions units will only fire NG and No. 2 oil. The maximum sulfur content shall not exceed 0.007% by weight when burning NG and 0.05% by weight when burning No. 2 oil. ET - Compliance shall be demonstrated by the unbiased CEMs data. Misc – A written QA/QC plan for the CEMs system is required to ensure continuous valid and representative NOx readings.
P001 P002 P003	12 lbs SO2/hr*	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	*When firing natural gas, during non-startup and shutdown operations OR – P001-P003 shall be operated at a minimum of 50% of

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													full load except during startup and shutdown periods. These emissions units will only fire NG and No. 2 oil. The maximum sulfur content shall not exceed 0.007% by weight when burning NG and 0.05% by weight when burning No. 2 oil. ET – None required per engineering guide 16.
P001 P002 P003	32 lbs CO/hr*	N	31-05(A)(3)	N	Y	Y	N	Y	Y	Y	N	N	*When firing natural gas, during non-startup and shutdown operations OR – P001-P003 shall be operated at a minimum of 50% of full load except during startup and shutdown periods. These emissions units will only fire NG and No. 2 oil. The maximum sulfur content shall not exceed 0.007% by weight when burning NG and 0.05% by weight when burning No. 2 oil.
P001 P002 P003	3.2 lbs VOC/hr*	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	*When firing natural gas, during non-startup and shutdown operations OR – P001-P003 shall be operated at a minimum of 50% of full load except during startup and shutdown periods. These emissions units will only fire NG and No. 2 oil. The maximum sulfur content shall not exceed 0.007% by weight when burning NG and 0.05% by weight when burning No. 2 oil. ET – None required per engineering guide 16.
P001 P002 P003	21.3 lbs PE/hr*	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	*When firing natural gas, during non-startup and shutdown operations OR – P001-P003 shall be operated at a minimum of 50% of full load except during startup and shutdown periods. These emissions units will only fire NG and No. 2 oil. The maximum sulfur content shall not exceed 0.007% by weight when burning NG and 0.05% by weight when burning No. 2 oil.

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													ET – None required per engineering guide 16.
P001 P002 P003	1.3 lbs formaldehyde/ hr*	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	*When firing natural gas, during non-startup and shutdown operations OR – P001-P003 shall be operated at a minimum of 50% of full load except during startup and shutdown periods. These emissions units will only fire NG and No. 2 oil. The maximum sulfur content shall not exceed 0.007% by weight when burning NG and 0.05% by weight when burning No. 2 oil.
P001 P002 P003	Visible emission limitation*	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	*Visible PE shall not exceed 10% opacity, as a six-minute average when firing natural gas, during non-startup and shutdown operations OR – P001-P003 shall be operated at a minimum of 50% of full load except during startup and shutdown periods. These emissions units will only fire NG and No. 2 oil. The maximum sulfur content shall not exceed 0.007% by weight when burning NG and 0.05% by weight when burning No. 2 oil. ET – M/R and Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings be conducted.
P001 P002 P003	42 ppmvdNOx at 15% oxygen (at full load, as a 1-hour average)*	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	Y	*When firing No. 2 oil/distillate oil, during non-startup and shutdown operations OR – P001-P003 shall be operated at a minimum of 50% of full load except during startup and shutdown periods. These emissions units will only fire NG and No. 2 oil. The maximum sulfur content shall not exceed 0.007% by weight when burning NG and 0.05% by weight when burning No. 2 oil.

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													ET – Compliance shall be demonstrated by the unbiased CEMs data. Misc – A written QA/QC plan for the CEMs system is required to ensure continuous valid and representative NOx readings.
P001 P002 P003	347 lbsNOx/hr*	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	Y	*When firing No. 2 oil/distillate oil, during non-startup and shutdown operations OR – P001-P003 shall be operated at a minimum of 50% of full load except during startup and shutdown periods. These emissions units will only fire NG and No. 2 oil. The maximum sulfur content shall not exceed 0.007% by weight when burning NG and 0.05% by weight when burning No. 2 oil. ET - Compliance shall be demonstrated by the unbiased CEMs data. Misc – A written QA/QC plan for the CEMs system is required to ensure continuous valid and representative NOx readings.
P001 P002 P003	107 lbs SO2/hr*	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	*When firing No. 2 oil/distillate oil, during non-startup and shutdown operations OR – P001-P003 shall be operated at a minimum of 50% of full load except during startup and shutdown periods. These emissions units will only fire NG and No. 2 oil. The maximum sulfur content shall not exceed 0.007% by weight when burning NG and 0.05% by weight when burning No. 2 oil. ET – None required per engineering guide 16.
P001 P002	72 lbs CO/hr*	N	31-05(A)(3)	N	Y	Y	N	Y	Y	Y	N	N	*When firing No. 2 oil/distillate oil, during non-startup and shutdown operations

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P003													OR – P001-P003 shall be operated at a minimum of 50% of full load except during startup and shutdown periods. These emissions units will only fire NG and No. 2 oil. The maximum sulfur content shall not exceed 0.007% by weight when burning NG and 0.05% by weight when burning No. 2 oil.
P001 P002 P003	8 lbs VOC/hr*	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	*When firing No. 2 oil/distillate oil, during non-startup and shutdown operations OR – P001-P003 shall be operated at a minimum of 50% of full load except during startup and shutdown periods. These emissions units will only fire NG and No. 2 oil. The maximum sulfur content shall not exceed 0.007% by weight when burning NG and 0.05% by weight when burning No. 2 oil. ET – None required per engineering guide 16.
P001 P002 P003	37 lbs PE/hr*	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	*When firing No. 2 oil/distillate oil, during non-startup and shutdown operations OR – P001-P003 shall be operated at a minimum of 50% of full load except during startup and shutdown periods. These emissions units will only fire NG and No. 2 oil. The maximum sulfur content shall not exceed 0.007% by weight when burning NG and 0.05% by weight when burning No. 2 oil.
P001 P002 P003	0.5 lbs formaldehyde/hr*	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	*When firing No. 2 oil/distillate oil, during non-startup and shutdown operations OR – P001-P003 shall be operated at a minimum of 50% of full load except during startup and shutdown periods. These emissions units will only fire NG and No. 2 oil. The maximum sulfur content shall not exceed 0.007% by weight when burning NG and 0.05% by weight when burning No. 2 oil.

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													ET – None required per engineering guide 16.
P001 P002 P003	140.2 tons CO/yr for P001-P003, combined*	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	*During startup and shutdown OR – The maximum annual hrs of operation for P001-P003, combined, shall not exceed 7747 hours per rolling, 12-month period when firing natural gas; 1400 hours per rolling ,12-month period when firing No. 2 oil/distillate oil; and 7447 cumulative hours of operation per rolling, 12-month period for the firing of NG and No. 2 oil where 1 hr of NG operation = 1 hr of operation and 1 hr of No. 2 oil operation = 5.34 hrs of operation. This will include startup and shutdown operations. This will include startup and shutdown operations. The permittee shall be limited to 550 startups and 550 shutdowns for P001-P003, combined per rolling, 12-month period. ET – Compliance shall be demonstrated in accordance with the recordkeeping requirements.
P001 P002 P003	22 tons NOx/yr from P001-P003, combined*	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	*During startup and shutdown OR – The maximum annual hrs of operation for P001-P003, combined, shall not exceed 7747 hours per rolling, 12-month period when firing natural gas; 1400 hours per rolling ,12-month period when firing No. 2 oil/distillate oil; and 7447 cumulative hours of operation per rolling, 12-month period for the firing of NG and No. 2 oil where 1 hr of NG operation = 1 hr of operation and 1 hr of No. 2 oil operation = 5.34 hrs of operation. This will include startup and shutdown operations. This will include startup and shutdown operations. The permittee shall be limited to 550 startups and 550 shutdowns for P001-P003, combined per rolling, 12-month period. ET – Compliance shall be demonstrated in accordance with the recordkeeping requirements.

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P001 P002 P003	11 tons VOC/yr from P001-P003, combined*	N	31-05(A)(3)	N	Y	Y	N	Y	Y	N	N	N	*During startup and shutdown OR – The maximum annual hrs of operation for P001-P003, combined, shall not exceed 7747 hours per rolling, 12-month period when firing natural gas; 1400 hours per rolling ,12-month period when firing No. 2 oil/distillate oil; and 7447 cumulative hours of operation per rolling, 12-month period for the firing of NG and No. 2 oil where 1 hr of NG operation = 1 hr of operation and 1 hr of No. 2 oil operation = 5.34 hrs of operation. This will include startup and shutdown operations. This will include startup and shutdown operations. The permittee shall be limited to 550 startups and 550 shutdowns for P001-P003, combined per rolling, 12-month period. ET – Compliance shall be demonstrated in accordance with the recordkeeping requirements.
P001 P002 P003	74.9 tons SO2 per rolling, 12-month period from P001-P003, combined	N	31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR – The maximum annual hrs of operation for P001-P003, combined, shall not exceed 7747 hours per rolling, 12-month period when firing natural gas; 1400 hours per rolling ,12-month period when firing No. 2 oil/distillate oil; and 7447 cumulative hours of operation per rolling, 12-month period for the firing of NG and No. 2 oil where 1 hr of NG operation = 1 hr of operation and 1 hr of No. 2 oil operation = 5.34 hrs of operation. This will include startup and shutdown operations. This will include startup and shutdown operations. The permittee shall be limited to 550 startups and 550 shutdowns for P001-P003, combined per rolling, 12-month period. ET – Compliance shall be demonstrated in accordance with the recordkeeping requirements.
P001 P002 P003	242.3 tons CO per rolling, 12-month period from P001-P003,	N	31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR – The maximum annual hrs of operation for P001-P003, combined, shall not exceed 7747 hours per rolling, 12-month period when firing natural gas; 1400 hours per rolling ,12-month period when firing No. 2 oil/distillate oil; and 7447

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
	combined												cumulative hours of operation per rolling, 12-month period for the firing of NG and No. 2 oil where 1 hr of NG operation = 1 hr of operation and 1 hr of No. 2 oil operation = 5.34 hrs of operation. This will include startup and shutdown operations. This will include startup and shutdown operations. The permittee shall be limited to 550 startups and 550 shutdowns for P001-P003, combined per rolling, 12-month period. ET – Compliance shall be demonstrated in accordance with the recordkeeping requirements.
P001 P002 P003	243 tons NOx per rolling, 12-month period from P001-P003, combined	N	31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR – The maximum annual hrs of operation for P001-P003, combined, shall not exceed 7747 hours per rolling, 12-month period when firing natural gas; 1400 hours per rolling ,12-month period when firing No. 2 oil/distillate oil; and 7447 cumulative hours of operation per rolling, 12-month period for the firing of NG and No. 2 oil where 1 hr of NG operation = 1 hr of operation and 1 hr of No. 2 oil operation = 5.34 hrs of operation. This will include startup and shutdown operations. This will include startup and shutdown operations. The permittee shall be limited to 550 startups and 550 shutdowns for P001-P003, combined per rolling, 12-month period. ET – Compliance shall be demonstrated in accordance with the recordkeeping requirements.
P001 P002 P003	79.6 tons PE per rolling, 12-month period from P001-P003, combined	N	31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR – The maximum annual hrs of operation for P001-P003, combined, shall not exceed 7747 hours per rolling, 12-month period when firing natural gas; 1400 hours per rolling ,12-month period when firing No. 2 oil/distillate oil; and 7447 cumulative hours of operation per rolling, 12-month period for the firing of NG and No. 2 oil where 1 hr of NG operation = 1 hr of operation and 1 hr of No. 2 oil operation = 5.34 hrs of operation. This will include startup and shutdown operations. This will include startup and shutdown operations. The permittee shall be limited to 550 startups and 550 shutdowns for P001-P003, combined per rolling, 12-month period.

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
													ET – Compliance shall be demonstrated in accordance with the recordkeeping requirements.
P001 P002 P003	4.9 tons formaldehyde per rolling, 12-month period from P001-P003, combined	N	31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR – The maximum annual hrs of operation for P001-P003, combined, shall not exceed 7747 hours per rolling, 12-month period when firing natural gas; 1400 hours per rolling ,12-month period when firing No. 2 oil/distillate oil; and 7447 cumulative hours of operation per rolling, 12-month period for the firing of NG and No. 2 oil where 1 hr of NG operation = 1 hr of operation and 1 hr of No. 2 oil operation = 5.34 hrs of operation. This will include startup and shutdown operations. The permittee shall be limited to 550 startups and 550 shutdowns for P001-P003, combined per rolling, 12-month period. This will include startup and shutdown operations. The permittee shall be limited to 550 startups and 550 shutdowns for P001-P003, combined per rolling, 12-month period. ET – Compliance shall be demonstrated in accordance with the recordkeeping requirements.
P001 P002 P003	21.2 tons VOC per rolling 12-month period from P001-P003, combined	N	31-05(D)	N	Y	Y	N	Y	Y	N	N	N	OR – The maximum annual hrs of operation for P001-P003, combined, shall not exceed 7747 hours per rolling, 12-month period when firing natural gas; 1400 hours per rolling ,12-month period when firing No. 2 oil/distillate oil; and 7447 cumulative hours of operation per rolling, 12-month period for the firing of NG and No. 2 oil where 1 hr of NG operation = 1 hr of operation and 1 hr of No. 2 oil operation = 5.34 hrs of operation. This will include startup and shutdown operations. This will include startup and shutdown operations. The permittee shall be limited to 550 startups and 550 shutdowns for P001-P003, combined per rolling, 12-month period. ET – Compliance shall be demonstrated in accordance with the recordkeeping requirements.
											N		

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P001 P002 P003	Visible emission limitation*	17-07(A)	N	N	Y	Y	N	Y	Y	N		N	*Visible PE shall not exceed 20% opacity, as a six-minute average except as provided by rule when firing No. 2 oil/distillate oil OR – The permittee shall fire only NG and No. 2 oil/distillate oil in these emissions units. ET – M/R and Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings be conducted.
P001 P002 P003	None	N	40 CFR, Part 60, Subpart GG	Y	N	N	N	Y	Y	N	N	N	ND – The emission limitations and sulfur content restriction specified in this rule are less stringent than the emission limitations and sulfur content established pursuant to OAC rule 3745-31-05(A)(3). Except as provided for in the terms and conditions of this permit, the permittee is not exempt from meeting any additional requirements of 40 CFR, Part 60, Subpart GG.
P001 P002 P003	None	18-06(F)	N	Y	N	N	N	N	N	N	N	N	ND – The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P001 P002 P003	None	17-11(B)(4)	N	Y	N	N	N	N	N	N	N	N	ND – The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).
P001 P002 P003	None	Chapter 3745-103	N	N	N	N	N	N	N	N	N	N	M/R/Rp – All terms and conditions are specified under the acid rain Title IV permit. ET – No emission limitations were established pursuant to this rule.
P001	None	N	40 CFR Parts 72	N	N	N	N	N	N	N	N	Y	M/R/Rp – All terms and conditions are specified under the acid rain Title IV permit.

EU(s)	Limitation	Basis		ND	OR	M	ENF	R	Rp	ET	St	Misc	Comments
		SIP (3745-)	Other										
P002 P003			and 75										ET – No emission limitations were established pursuant to this rule. Misc – A written QA/QC plan for the CEMs system is required to ensure continuous valid and representative NOx readings.
P001 P002 P003	None	114-01	ORC 3704.03(F)	N	N	Y	N	Y	Y	N	N	N	ET – No emission limitations were established pursuant to this rule.
B001 P001 P002 P003	None												CAM is currently not applicable. B001 is uncontrolled for all pollutants. P001, P002 and P003 uses control for only NOx emissions and the CEMS monitoring is sufficient to meet exemption for CAM.

DRAFT

Division of Air Pollution Control
Title V Permit
for
Robert P. Mone Plant

Facility ID:	0381000043
Permit Number:	P0111116
Permit Type:	Renewal
Issued:	11/6/2012
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Robert P. Mone Plant

Table of Contents

Authorization 1
A. Standard Terms and Conditions 2
1. Federally Enforceable Standard Terms and Conditions 3
2. Monitoring and Related Record Keeping and Reporting Requirements 3
3. Scheduled Maintenance 6
4. Risk Management Plans 6
5. Title IV Provisions 7
6. Severability Clause 7
7. General Requirements 7
8. Fees 8
9. Marketable Permit Programs 8
10. Reasonably Anticipated Operating Scenarios 8
11. Reopening for Cause 9
12. Federal and State Enforceability 9
13. Compliance Requirements 9
14. Permit Shield 11
15. Operational Flexibility 11
16. Emergencies 11
17. Off-Permit Changes 11
18. Compliance Method Requirements 12
19. Insignificant Activities or Emissions Levels 12
20. Permit to Install Requirement 12
21. Air Pollution Nuisance 13
22. Permanent Shutdown of an Emissions Unit 13
23. Title VI Provisions 13
24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only 14
25. Records Retention Requirements Under State Law Only 14
26. Inspections and Information Requests 14
27. Scheduled Maintenance/Malfunction Reporting 15
28. Permit Transfers 15

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

B. Facility-Wide Terms and Conditions..... 16

C. Emissions Unit Terms and Conditions 18

1. B001, NG Fired Fuel Heater..... 19

2. Emissions Unit Group -Combustion Turbines: P001,P002,P003, ... 23

Authorization

Facility ID:	0381000043
Facility Description:	Peaking Station
Application Number(s):	A0045315
Permit Number:	P0111116
Permit Description:	Renewal Title V operating permit for a peaking station.
Permit Type:	Renewal
Issue Date:	11/6/2012
Effective Date:	To be entered upon final issuance
Expiration Date:	To be entered upon final issuance
Superseded Permit Number:	P0087748

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Robert P. Mone Plant
4406 Mentzer Road
Convoy, OH 45832

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Ohio EPA DAPC, Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(419)352-8461

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Ohio EPA DAPC, Northwest District Office. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. 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 (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

c) The permittee shall submit required reports in the following manner:

(1) All reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations caused by malfunctions shall be submitted in the following manner:

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

In accordance with OAC rule 3745-15-06, a malfunction reportable under OAC rule 3745-15-06(B) is a deviation of the federally enforceable permit requirements. Even though verbal notifications and written reports are required for malfunctions pursuant to OAC rule 3745-15-06, the written reports required pursuant to this term must be submitted quarterly to satisfy the prompt reporting provision of OAC rule 3745-77-07(A)(3)(c).

In identifying each deviation caused by a malfunction, the permittee shall specify the emission limitation(s) (or control requirement(s)) for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. For a specific malfunction, if this information has been provided in a written report that was submitted in accordance with OAC rule 3745-15-06, the permittee may simply reference that written report to identify the deviation. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing on a quarterly basis.

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive

measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.

If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.

See A.29 below if no deviations occurred during the quarter.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the

insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) 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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Ohio EPA DAPC, Northwest District Office.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

If applicable, the permittee shall 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"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

a) a compliance plan for meeting the requirements of 40 C.F.R. Part 68 by the date specified in 40 C.F.R. 68.10(a) and OAC 3745-104-05(A); or

b) as part of the compliance certification submitted under 40 C.F.R. 70.6(c)(5), a certification statement that the source is in compliance with all requirements of 40 C.F.R. Part 68 and OAC Chapter 3745-104, including the registration and submission of the risk management plan.

(Authority for term: OAC rule 3745-77-07(A)(4))

5. 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.

(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

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.

(Authority for term: OAC rule 3745-77-07(A)(6))

7. 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 reissuance, or modification, or for denial of a permit renewal application.

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, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. 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, reopening 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.

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminant sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.

(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. 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.

(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

(Authority for term: OAC rule 3745-77-07(A)(9))

10. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

(Authority for term: OAC rule 3745-77-07(A)(10))

11. Reopening for Cause

This Title V permit will be reopened prior to its expiration date under the following conditions:

a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.

b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.

c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.

d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

(Authority for term: OAC rules 3745-77-07(A)(12) and 3745-77-08(D))

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of 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, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V 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.

b) 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 paragraph (E) of OAC rule 3745-77-03.

(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.

c) The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air 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.

d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the appropriate Ohio EPA District Office or local air agency) and the Administrator of the U.S. EPA in the following manner and with the following content:

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

(Authority for term: OAC rules 3745-77-07(C)(1),(2),(4) and (5) and ORC section 3704.03(L))

14. Permit Shield

a) Compliance with the terms and conditions of this permit (including terms and conditions established for alternate operating scenarios, emissions trading, and emissions averaging, but excluding terms and conditions for which the permit shield is expressly prohibited under OAC rule 3745-77-07) shall be deemed compliance with the applicable requirements identified and addressed in this permit as of the date of permit issuance.

b) This permit shield provision shall apply to any requirement identified in this permit pursuant to OAC rule 3745-77-07(F)(2), as a requirement that does not apply to the source or to one or more emissions units within the source.

(Authority for term: OAC rule 3745-77-07(F))

15. Operational Flexibility

The permittee is authorized to make the changes identified in OAC rule 3745-77-07(H)(1)(a) to (H)(1)(c) within the permitted stationary source without obtaining a permit revision, if such change is not a modification under any provision of Title I of the Act [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the appropriate Ohio EPA District Office or local air agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

The permittee shall have an affirmative defense of emergency to an action brought for noncompliance with technology-based emission limitations if the conditions of OAC rule 3745-77-07(G)(3) are met. This emergency defense provision is in addition to any emergency or upset provision contained in any applicable requirement.

(Authority for term: OAC rule 3745-77-07(G))

17. Off-Permit Changes

The owner or operator of a Title V source may make any change in its operations or emissions at the source that is not specifically addressed or prohibited in the Title V permit, without obtaining an amendment or modification of the permit, provided that the following conditions are met:

a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).

d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

Paragraph (I) of rule 3745-77-07 of the Administrative Code applies only to modification or amendment of the permittee's Title V permit. The change made may require a permit-to-install under Chapter 3745-31 of the Administrative Code if the change constitutes a modification as defined in that Chapter. Nothing in paragraph (I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(Authority for term: OAC rule 3745-77-07(I))

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.

(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

Each IEU that has one or more applicable requirements shall comply with those applicable requirements.

(Authority for term: OAC rule 3745-77-07(A)(1))

20. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.

(Authority for term: OAC rule 3745-77-07(A)(1))

21. 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.

(Authority for term: OAC rule 3745-77-07(A)(1))

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.

After the date on which an emissions unit is permanently shut down (i.e., that 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 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping RequirementsUnder State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. 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.)

25. Records Retention RequirementsUnder State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. 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, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.

(Authority for term: OAC rule 3745-77-07(C))

27. 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 of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of 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 emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation 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) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

b) where an uncontrolled emissions unit has no monitoring, record keeping, or reporting requirements and the emissions unit's applicable emission limitations are established at the potentials to emit; or

c) where the company's responsible official has certified that an emissions unit has been permanently shut down.

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. The permittee shall ensure that any CAIR NOx, SO2, or NOx ozone season units comply 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 as outlined in the permit application submitted as required by OAC rules 3745-109-03, 109-10 and 109-16 for the affected emissions units.

3. The permittee shall also comply with any subsequent federally mandated programs that may replace the CAIR program affecting electric generating facilities (see note in paragraph 4.a).

4. Clean Air Interstate Rule – OAC Chapter 3745-109**.**

   a) Facility Code –0381000043.

      (1) P001

      (2) P002

      (3) P003

      Note: Ohio EPA DAPC has completed proposed rule amendments for OAC Chapter 3745-14, specifically, OAC rule 3745-14-01 and OAC rule 3745-14-06, which facilitated the transition of the affected units from OAC Chapter 3745-14 into the federal Clean Air Interstate Rule (CAIR) program which began with the 2009 control periods. This began the process of "sunsetting" the parts of OAC Chapter 3745-14 which were no longer needed as a result of Ohio's CAIR rules (OAC Chapter 3745-109).

   [OAC rules 3745-14-08(A)(2)(c) and 3745-14-08(A)(2)(d)]

5. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within the identified permit to install for the emissions unit. The insignificant emissions units listed below are subject to one or more applicable requirements contained in a permit-to-install or in the SIP approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21, and/or 40 CFR Part 60 or 63:

   a) B001 – diesel fire pump (PBR02049); and

   b) T001 – 1,120,000 gallon #2 fuel storage tank (PTI 03-13410 issued 11/05/2002).

   [OAC rule 3745-77-07(A)(13)]

C. Emissions Unit Terms and Conditions

1. B001, NG Fired Fuel Heater

Operations, Property and/or Equipment Description:

12 mmBtu/hr Natural Gas-Fired Fuel Heater

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) None.

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 rule 3745-31-05(A)(3) [PTI 03-13683, issued 10/18/01]	0.0076 lb particulate emissions (PE)/mmBtu of actual heat input; 0.10 lb PE/hr; 0.40 ton PE/yr 0.96 lb carbon monoxide (CO)/hr; 4.20 tons CO/yr 1.20 lbs nitrogen oxides (NOx)/hr; 5.30 tons NOx/yr See b)(2)a.
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
c.	OAC rule 3745-17-10(B)	See b)(2)b.
d.	OAC rule 3745-18-06	See b)(2)c.
e.	40 CFR, Part 60, Subpart Dc	See d)(2).

(2) Additional Terms and Conditions

a. The requirements of this rule also include compliance with the requirements of OAC rule 3745-17-07(A) and 40 CFR, Part 60, Subpart Dc.

b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c. This emissions unit is exempt from the requirements of OAC rule 3745-18-06 in accordance with OAC rule 3745-18-06(A).

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[OAC rule 3745-77-07(A)(1) and PTI 03-13683]

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI 03-13683]

(2) The permittee shall record and maintain records of the amount of each fuel combusted during each day.

[OAC rule 3745-77-07(C)(1) and PTI 03-13683]

e) Reporting Requirements

(1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

[OAC rule 3745-77-07(C)(1) and PTI 03-13683]

(2) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[OAC rule 3745-15-03(A)]

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. <u>Emission Limitations:</u>

0.0076 lb PE/mmBtu of actual heat input; 0.10 lb PE/hr; 0.40 ton PE/yr

<u>Applicable Compliance Method:</u>

The lb PE/mmBtu emission limitation represents the potential to emit* for this emissions unit. Therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation.

*Potential to emit was determined using AP-42, Table 1.4-2 (7/98).

The hourly emission limitation was determined by multiplying the 0.0075 lb PE/mmBtu of actual heat input emission limitation by a maximum heat input of 12 mmBtu/hr.

If required, the permittee shall demonstrate compliance with the lb/mmBtu of actual heat input and hourly emission limitations in accordance with Methods 1-5 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was determined by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI 03-13683]

b. Emission Limitations:

0.96 lb CO/hr; 4.20 tons CO/yr

Applicable Compliance Method:

The hourly emission limitation was determined by multiplying an AP-42 Emission Factor of 0.084 lb CO/mmBtu of actual heat input from Table 1.4-1 (7/98) by the maximum heat input of 12 mmBtu/hr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was determined by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI 03-13683]

c. Emission Limitations:

1.20 lbsNOx/hr; 5.30 tons NOx/yr

Applicable Compliance Method:

The hourly emission limitation was determined by multiplying an AP-42 Emission Factor of 0.10 lbNOx/mmBtu of actual heat input from Table 1.4-1 (7/98) by the maximum heat input of 12 mmBtu/hr.

If required, the permittee shall demonstrate compliance with the hourly emission limitation in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

The annual emission limitation was determined by multiplying the hourly emission limitation by a maximum operating schedule of 8760 hrs/yr, and then dividing by 2000 lbs/ton. Therefore, provided compliance is shown with the hourly emission limitation, compliance with the annual emission limitation shall also be demonstrated.

[OAC rule 3745-77-07(C)(1) and PTI 03-13683]

d. Emission Limitation:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, compliance with the visible emissions limitations shall be determined in accordance with OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI 03-13683]

g) Miscellaneous Requirements

(1) None.

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

EU ID	Operations, Property and/or Equipment Description
P001	GE-7FA simple cycle combustion turbine
P002	GE-7FA simple cycle combustion turbine
P003	GE-7FA simple cycle combustion turbine

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)(7), d)(8) and d)(9).

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 rule 3745-31-05(A)(3) [PTI 03-13410, issued 11/05/02]	See b)(2)a. and b)(2)e. When firing natural gas, during non-startup and shutdown operations, emissions from each emissions unit P001-P003, individually shall not exceed: 9 ppmvd of nitrogen oxides (NOx) at 15% oxygen (at full load, as a 1-hour average) 65.0 lbsNOx/hr 12.0 lbs sulfur dioxide (SO2)/hr 32.0 lbs carbon monoxide (CO)/hr 3.20 lbs volatile organic compounds (VOC)/hr 21.30 lbs particulate emissions (PE)/hr 1.30 lbs formaldehyde/hr Visible PE shall not exceed 10% opacity, as a six-minute average, when firing natural gas

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		When firing No. 2 oil/distillate oil, during non-startup and shutdown operations, emissions from each emissions unit, P001-P003, individually shall not exceed: 42 ppmvdNOx at 15% oxygen (at full load, as a 1-hour average) 347.0 lbsNOx/hr 107.0 lbs SO2/hr 72.0 lbs CO/hr 8.0 lbs VOC/hr 37.0 lbs PE/hr 0.50 lb formaldehyde/hr Startup and shutdown emissions from emissions units P001-P003, combined, shall not exceed the following limitations: 140.20 tons CO/yr 22.0 tons NOx/yr 11.0 tons VOC/yr See b)(2)f.
b.	OAC rule 3745-31-05(D) [PTI 03-13410, issued 11/05/02]	Emissions from emissions units P001-P003, combined, shall not exceed the following: 74.90 tons SO2 per rolling, 12-month period 242.30 tons CO per rolling, 12-month period 243.0 tons NOx per rolling, 12-month period 79.60 tons PE per rolling, 12-month period

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		4.90 tons formaldehyde per rolling, 12-month period 21.20 tons VOC per rolling, 12-month period
c.	OAC rule 3745-17-07(A)	When firing natural gas, the visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A). When firing No. 2 oil/distillate oil, visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
d.	40 CFR, Part 60, Subpart GG	See b)(2)c.
e.	OAC rule 3745-18-06(F)	See b)(2)b.
f.	OAC rule 3745-17-11(B)(4)	See b)(2)b.
g.	OAC chapter 3745-103	See b)(2)d.
h.	40 CFR Parts 72 and 75	See b)(2)d.
i.	ORC 3704.03(F) OAC rule 3745-114-01	See d)(7) through d)(9)

(2) Additional Terms and Conditions

a. The permittee shall install, operate and maintain dry low NOx burners and a water injection system on each emissions unit P001-P003.

b. The emission limitation specified by this rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(A)(3).

c. The emission limitation and sulfur content restriction specified by this applicable rule are less stringent than the emission limitation and sulfur content restriction established pursuant to OAC rule 3745-31-05(A)(3). Except as provided for in the terms and conditions of this permit, the permittee is not exempt from meeting any additional requirements of 40 CFR, Part 60, Subpart GG.

d. The permittee shall ensure that any affected emissions unit complies with the requirements established under 40 CFR Parts 72 and 75 concerning acid rain. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

e. The requirements of OAC rule 3745-31-05(A)(3) also include compliance with the requirements of OAC rule 3745-31-05(D) and, when firing No. 2 oil/distillate oil, OAC rule 3745-17-07(A).

f. The annual emission limitations for startup and shutdown emissions apply for both the firing of natural gas and No. 2 oil/distillate oil.

g. "Full load" shall be defined as the electrical output at the maximum achievable fuel flow rate to each emissions unit for the ambient and equipment conditions during any operating hour. Any actual electrical output within 10% of the calculated electrical output shall be considered full load.

h. "Startup/Shutdown Operation" or "Startup and Shutdown Operation" occurs when each emissions unit is running at less than 50% of the electric output at full load.

c) Operational Restrictions

(1) The maximum annual hours* of operation for emissions units P001-P003, combined, shall not exceed any of the following:

a. 7477 hours per rolling, 12-month period when firing natural gas;

b. 1400 hours per rolling, 12-month period when firing No. 2 oil/distillate oil; and

c. 7477 cumulative hours of operation per rolling, 12-month period for the firing of natural gas and No. 2 oil/distillate oil, where:

i. 1 hour of operation firing natural gas = 1 hour of operation; and

ii. 1 hour of operation firing No. 2 oil/distillate oil = 5.34 hours of operation.

*Startup and shutdown periods are to be included in these cumulative hourly operational restrictions.

These emissions units have been in operation more than 12 months and, as such, the permittee has existing records to generate the rolling, 12-month summation of the hours of operation, upon issuance of this permit.

[OAC rule 3745-77-07(A)(1) and PTI 03-13410]

(2) With the exception of startup and shutdown periods, emissions unit P001-P003 shall be operated at a minimum of 50% of full load. The permittee may petition the Ohio EPA, Northwest District Office (NWDO) to operate at a greater load range if it can be demonstrated to the Agency's satisfaction that each emissions unit will comply with all applicable emission limitations in this permit and the modeling requirements specified in Engineering Guide #69.

[OAC rule 3745-77-07(A)(1) and PTI 03-13410]

(3) The permittee shall fire only natural gas and No. 2 oil/distillate oil in emissions units P001-P003.

[OAC rule 3745-77-07(A)(1) and PTI 03-13410]

(4) The maximum sulfur content of the natural gas shall not exceed 0.007% by weight. The maximum sulfur content of the No. 2 oil/distillate oil shall not exceed 0.05% by weight.

[OAC rule 3745-77-07(A)(1) and PTI 03-13410]

(5) The permittee shall be limited to 550 startups and 550 shutdowns for emissions units P001-P003, combined, per rolling, 12-month period.

[OAC rule 3745-77-07(A)(1) and PTI 03-13410]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of the following information for emissions units P001-P003, combined:

a. The number of hours of operation when firing natural gas;

b. The number of hours of operation when firing No. 2 oil/distillate oil;

c. The cumulative hours of operation when firing natural gas and No. 2 oil/distillate oil;

d. The rolling, 12-month summations of the hours of operation when firing natural gas, when firing No. 2 oil/distillate oil, and the cumulative hours of operation when firing natural gas and No. 2 oil/distillate oil;

e. The number of startups and shutdowns;

f. The startup and shutdown emissions* for NOx, VOC and CO, in tons;

g. The emission rates* for PE, NOx, SO2, CO, VOC and formaldehyde, in tons; and

h. The rolling, 12-month summations of the emission rates for PE, NOx, SO2, CO, VOC and formaldehyde (including startup and shutdown emissions for NOx, CO and VOC), in tons.

*The permittee shall use the continuous NOx emission monitoring data to determine the NOx emissions for these emissions units. During any period when the continuous NOx emission monitoring systems are not operational, the permittee shall use the appropriate missing data procedures specified in 40 CFR Part 75 to determine the NOx emissions. The permittee shall use the most recent emission test data multiplied by the hours of operation to determine the PE, CO, VOC and formaldehyde emissions for these emissions units. The permittee shall use the most recent emission test data or the fuel flow and fuel sulfur content data to determine the SO2 emissions for these emissions units. The following permittee-supplied emission factors may be used to determine the CO and VOC emissions during each emissions unit startup and shutdown; for natural gas (No. 2 oil/distillate oil) startups; 360.0 (220.0) lbs CO/hr and 20.0 (20.0) lbs VOC/hr, and for shutdowns; 150 (120) lbs CO/hr and 20.0 (20.0) lbs VOC/hr.

[OAC rule 3745-77-07(C)(1) and PTI 03-13410]

(2) For each day during which the permittee fires a fuel other than natural gas or No. 2 oil/distillate oil, the permittee shall maintain a record of the type and quantity of fuel fired in emissions units P001-P003, individually.

[OAC rule 3745-77-07(C)(1) and PTI 03-13410]

(3) The information management systems for emissions units P001-P003 shall be capable of monitoring and recording fuel flow (in gallons and million cu ft), percent load, and hours of 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 units are in operation, the permittee shall comply with the appropriate missing data procedures specified in 40 CFR Part 75.

[OAC rule 3745-77-07(C)(1) and PTI 03-13410]

(4) Except as provided below, the permittee shall comply with the fuel monitoring and testing provisions specified in 40 CFR Part 60.334(b) and 40 CFR Part 60.335(d). In lieu of complying with the aforementioned fuel sulfur content monitoring and testing provisions, the permittee may elect to comply with the applicable monitoring and testing requirements specified in 40 CFR, Part 75, Appendix D, Sections 2.2 and 2.3 for fuel oil and natural gas, respectively.

Where applicable, the permittee shall maintain records of the sulfur contents and heating values of the fuels fired in each emissions unit. ASTM D2880, D129, D1552, D2622, or D4294 shall be used to determine the sulfur content of the fuel oil and ASTM D1072, D3031, D4084, D4468, D5504, or D3246 shall be used to determine the sulfur content of the natural gas. ASTM D240 shall be used to determine the heat value of the fuel oil and ASTM D1826, D3588, or D4891 shall be used to determine the heat value of the natural gas. The most recent revisions to the applicable test method shall be used for these analyses. Alternative, equivalent methods may be used upon written approval by the Ohio EPA, NWDO.

[OAC rule 3745-77-07(C)(1) and PTI 03-13410]

(5) Except for periods described in 40 CFR Part 60.13, the permittee shall operate and maintain equipment to continuously monitor and record NOx from each emissions unit in the units established in this permit. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13 and/or 40 CFR Part 75 or as approved by the Ohio EPA.

The permittee shall maintain records of all data obtained by the continuous NOx monitoring system including, but not limited to, parts per million NOx on an instantaneous (one-minute) basis, emissions of NOx in the units established in this permit (with an hourly averaging period), results of daily zero/span calibration checks, and the magnitude of manual calibration adjustments.

The installation and operation of systems to continuously monitor and record emissions of NOx may be performed in lieu of continuously monitoring the fuel consumption, water

ratio, and nitrogen content of the fuel being fired in the turbine, as required by 40 CFR 60.334.

A statement of clarification of the existing continuous NOx monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR, Part 60, Appendix B, Performance Specification 2 and/or 40 CFR Part 75. Proof of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

[OAC rule 3745-77-07(C)(1) and PTI 03-13410]

(6) In lieu of installing an oxygen monitor as part of the NOx monitoring system, the permittee has installed the carbon dioxide monitor, and on July 16, 2002, the permittee successfully completed the monitoring system accuracy demonstration.

[OAC rule 3745-77-07(C)(1) and PTI 03-13410]

(7) The permit to install for these emissions units (P001-P003) were evaluated based on the actual materials and the design parameters of the emissions units' 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 these emissions units using data from the permit to install application and the SCREEN 3.0 model was compared to the MAGLC. The following summarizes the results of the modeling for the "worst case" pollutants:

Pollutant: formaldehyde

TLV (ug/m3): 273 (converted from STEL)

Maximum Hourly Emission Rate (lbs/hr): 3.9*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3.23

MAGLC (ug/m3): 6.49

Pollutant: sulfuric acid

TLV (ug/m3): 1000

Maximum Hourly Emission Rate (lbs/hr): 33.0*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.983

MAGLC (ug/m3): 23.8

*For emissions units P001-P003, combined.

(8) 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.

(9) 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) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

a. each day when a fuel other than natural gas or No. 2 oil/distillate oil was burned in emissions units P001-P003;

b. all exceedances of the rolling, 12-month hours of operation restrictions:

i. when firing natural gas;

ii. when firing no. 2 fuel oil/distillate oil; and

iii. all exceedances of the cumulative hours of operation when firing natural gas and No. 2 oil/distillate oil;

c. all exceedances of the rolling, 12-month limitations for PE, NOx, SO2, CO and formaldehyde;

d. any record which shows that the sulfur content of the natural gas exceeded 0.007%, by weight, or the sulfur content of the No. 2 oil/distillate oil exceeded 0.05%, by weight;

e. each time when each emissions unit was not in compliance with the emissions unit operating load requirements specified in c)(2) above

The quarterly deviation (excursion) reports shall be submitted in accordance with the Standard Terms and Conditions of this permit.

[OAC rule 3745-77-07(C)(1) and PTI 03-13410]

(2) The permittee shall submit quarterly reports that identify each period during which an exemption for ice-fog provided in 40 CFR Part 60.332(f) is in effect. The report 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.

[OAC rule 3745-77-07(C)(1) and PTI 03-13410]

(3) Continuous NOx Emission Reporting

a. Pursuant to OAC rule 3745-15-04, ORC Sections 3704.03(I) and 3704.031, and 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, NWDO documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of NOx values in excess of the applicable emission limitations specified in the terms and conditions of this permit (65.0 lbs/hr and 9 ppmvd at 15% oxygen (at full load as defined in b)(2)g., as a 1-hour average) when firing natural gas and 347.0 lbs/hr and 42 ppmvd at 15% oxygen (at full load as defined in b)(2)g., as a 1-hour average) when firing No. 2 oil/distillate oil). These reports shall also contain the total NOx 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 Ohio EPA, NWDO documenting any continuous

NOxmonitoring system downtime while the emissions units were on line (date, time, duration, and reason) along with any corrective action(s) taken. The permittee shall provide the emissions units 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 units and the total operating time of the analyzer while the emissions units were on line shall also be included in the quarterly report.

c. If there are no excess 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 malfunctions. The total operating time of the emissions units were on line also shall be included in the quarterly report. These quarterly excess emissions reports shall be submitted by January 30, April 30, July 20 and October 30 of each year and shall address the data obtained during the previous calendar quarter.

d. Pursuant to OAC rule 3745-15-04, and ORC Sections 3704.03(I) and 3704.031, the permittee shall submit a summary of the excess emission report pursuant to 40 CFR Part 60.7. The summary shall be submitted to the Ohio EPA, NWDO within 30 days following the end of each calendar quarter in a manner prescribed by the Director.

[OAC rule 3745-77-07(C)(1) and PTI 03-13410]

(4) In lieu of the excess emissions reports required under 40 CFR Part 60.334, the permittee shall submit reports for this emissions units P001-P003 in accordance with this permit.

[OAC rule 3745-77-07(C)(1) and PTI 03-13410]

(5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[OAC rule 3745-15-03(A)]

f) Testing Requirements

(1) The permittee shall conduct, or have conducted, emission testing for emissions units P001-P003 in accordance with the following requirements:

a. Currently, these emissions units are only firing natural gas, but have the capability of firing No. 2 oil/distillate oil. When firing natural gas, the emission testing shall be conducted approximately 2.5 years after issuance. The next time No. 2 oil/distillate oil is fired, emission testing shall be conducted within 12 months.

b. The emission testing shall be conducted to demonstrate compliance with the mass emission limitations for CO.

c. The following test method(s) shall be employed to demonstrate compliance with the above emission limitations :

i. For CO Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA, NWDO.

d. The testing shall be performed at full load, as defined in b)(2)g., unless otherwise specified or approved by the Ohio EPA, NWDO.

e. Not later than 45 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, NWDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions units operating parameters, the time(s) and date(s) 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, NWDO's refusal to accept the results of the emission tests.

f. Personnel from the Ohio EPA, NWDO shall be permitted to witness the tests, examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions units and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

g. A comprehensive written report on the results of the emission tests shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA, NWDO within 30 days following completion of the tests. The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA, NWDO.

[OAC rule 3745-77-07(C)(1) and PTI 03-13410]

(2) 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. <u>Emission Limitations</u>:

For emissions units P001-P003, individually, during non-startup and shutdown operations:

When firing natural gas:

65.0 lbsNOx/hr; 9 ppmvdNOx at 15% oxygen (at full load, as a 1-hour average)

When firing No. 2/distillate oil:

347.0 lbsNOx/hr; 42 ppmvdNOx at 15% oxygen (at full load, as a 1-hour average)

Applicable Compliance Method:

The company has demonstrated initial compliance with the above emission limitations and outlet concentrations. Continued compliance shall be demonstrated by the unbiased actual continuous emission monitoring data obtained per the requirements described in d)(5) and d)(6).

[OAC rule 3745-77-07(C)(1) and PTI 03-13410]

b. Emission Limitations:

For emissions units P001-P003, individually, during non-startup and shutdown operations:

When firing natural gas:

32.0 lbs CO/hr

When firing No. 2 oil/distillate oil:

72.0 lbs CO/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the above emission limitations in accordance with emission testing as described in f)(1).

[OAC rule 3745-77-07(C)(1) and PTI 03-13410]

c. Emission Limitations:

For emissions units P001-P003, individually, during non-startup and shutdown operations:

When firing natural gas:

21.30 lbs PE/hr

3.20 lbs VOC/hr

When firing No. 2 oil/distillate oil:

37.0 lbs PE/hr

8.0 lbs VOC/hr

Applicable Compliance Method:

The hourly emission limitations represent the emissions units' potential to emit based on emissions data from the vendor.

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

If required, the permittee shall demonstrate compliance with the hourly VOC limitations above in accordance with 40 CFR Part 60 Appendix A, Methods 1 through 4 and 18, 25, or 25A, as appropriate.

[OAC rule 3745-77-07(C)(1) and PTI 03-13410]

d. Emission Limitations:

For emissions units P001-P003, individually, during non-startup and shutdown operations:

When firing natural gas:

12.0 lbs SO2/hr

When firing No. 2 oil/distillate oil:

107.0 lbs SO2/hr

Applicable Compliance Method:

The hourly emission limitations represents the emissions units' potential to emit based on a maximum fuel flow rate of the unit, as specified in the permittee's Title V application, and the maximum sulfur content of the fuel (0.05% for fuel oil and 0.007% for natural gas), as established in c)(4).

If required, the permittee shall demonstrate compliance with the hourly limitations by testing in accordance with Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI 03-13410]

e. Emission Limitations:

For emissions units P001-P003, individually, during non-startup and shutdown operations:

When firing natural gas:

1.30 lbs formaldehyde/hr

When firing No. 2 oil/distillate oil

0.50 lb formaldehyde/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly limitations by multiplying the AP-42 emission factors of 0.00071 lb formaldehyde/mmBtu (natural gas) and 0.00028 lb formaldehyde/mmBtu (No. 2 oil) (Section 31., Table 3.1-4, dated 4/00) by the maximum heat input (1946.3 mmBtu/hr).

If required, the permittee shall demonstrate compliance with the hourly limitations by testing in accordance with Methods 1-4 of 40 CFR, Part 60, Appendix A and Method 320 of 40 CFR, Part 63, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI 03-13410]

f. Emission Limitation:

For emissions units P001-P003, individually, during non-startup and shutdown operations:

When firing natural gas:

Visible PE shall not exceed 10% opacity, as a six-minute average

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined through visible emission observations performed in accordance with Method 9 of 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI 03-13410]

g. Emission Limitation:

For emissions units P001-P003, individually, during non-startup and shutdown operations:

When firing No. 2 oil/distillate oil:

Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule

Applicable Compliance Method:

If required, compliance with the visible emission limitation shall be determined through visible emissions observations performed in accordance with the procedures specified in OAC rule 3745-17-03(B)(1).

[OAC rule 3745-77-07(C)(1) and PTI 03-13410]

h. Emission Limitations:

For emissions units P001-P003, combined, during startup and shutdown operations:

140.2 tons CO/yr

22.0 tons NOx/yr

11.0 tons VOC/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual emission limitations in accordance with the record keeping requirements specified in d)(1).

[OAC rule 3745-77-07(C)(1) and PTI 03-13410]

i. Emission Limitations:

For emissions units P001-P003, combined:

74.90 tons SO2 per rolling, 12-month period

242.30 tons CO per rolling, 12-month period

243.0 tons NOx per rolling, 12-month period

79.60 tons PE per rolling, 12-month period

21.20 tons VOC per rolling, 12-month period

4.90 tons formaldehyde per rolling, 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance with the rolling, 12-month emission limitations in accordance with the record keeping requirements specified in d)(1).

g) Miscellaneous Requirements

(1) The permittee shall maintain a written quality assurance/quality control plan for the continuous NOx monitoring system designed to ensure continuous valid and representative readings of NOx emissions in units of the applicable standards. The plan shall follow the requirements of 40 CFR, Part 60, Appendix F and/or 40 CFR, Part 75, Appendix B. the quality assurance/quality control plan and a record dedicated to the continuous NOx monitoring system must be kept on site and available for inspection during regular office hours.