



State of Ohio Environmental Protection Agency

RE: FINAL PERMIT TO INSTALL

CERTIFIED MAIL

Street Address:

122 S. Front Street

Lazarus Gov. Center TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

Lazarus Gov. Center
P.O. Box 1049

OTTAWA COUNTY
Application No: 03-13779

DATE: 8/27/2002

Genoa Diesel Generating Station
George Adams
509 Main Street
Genoa, OH 434301626

Enclosed please find an Ohio EPA Permit to Install which will allow you to install the described source(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, I urge you to read it carefully.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

Michael W. Ahern, Supervisor
Field Operations and Permit Section
Division of Air Pollution Control

CC: USEPA

NWDO



**Permit To Install
Terms and Conditions**

**Issue Date: 8/27/2002
Effective Date: 8/27/2002**

FINAL PERMIT TO INSTALL 03-13779

Application Number: 03-13779
APS Premise Number: 0362000130
Permit Fee: **\$600**
Name of Facility: Genoa Diesel Generating Station
Person to Contact: George Adams
Address: 509 Main Street
Genoa, OH 434301626

Location of proposed air contaminant source(s) [emissions unit(s)]:
**Industrial Park Road
Genoa, Ohio**

Description of proposed emissions unit(s):
(3) diesel-fired generation units.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

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

2. Reporting Requirements Related to Monitoring and Record keeping Requirements

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 (a) 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, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., 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.)

3. Records Retention Requirements

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.

4. 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

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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.

5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction 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).

6. 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.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio

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Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

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

10. Public Disclosure

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

11. Applicability

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

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

This facility is permitted to operate each source described by this Permit to Install for a period of up to one year from the date the source commenced operation. This permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the emissions unit(s) covered by this permit.

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14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit to Install fees within 30 days after the issuance of this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

<u>Pollutant</u>	<u>Tons Per Year</u>
NO _x	84.47
CO	6.48
PE	1.26
OC	1.87
SO ₂	1.78

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
P001 - 3516B Caterpillar number two Fuel Oil-Fired Generator, Unit #1 at 19.8 MMBtu/hr equipped with a Low NO _x Combustion Control Module	OAC rule 3745-31-05(A)(3)	see A.2.a
		47.69 lbs nitrogen oxides (NO _x)/hr
		3.67 lbs carbon monoxide (CO)/hr, 6.48 tons CO/yr
		1.06 lbs organic compounds (OC)/hr, 1.87 tons OC/yr
		1.26 tons particulate emissions (PE)/yr, 0.036 lb PE/MMBtu heat input
		1.78 tons sulfur dioxide (SO ₂)/yr, 0.051 lb SO ₂ /MMBtu heat input
		Visible particulate emissions shall not exceed 10% opacity, as a six-minute average.
	OAC rule 3745-17-07(A)	see A.2.b
	OAC rule 3745-17-11(B)(5)(b)	see A.2.b
	OAC rule 3745-18-06(G)	see A.2.b
	OAC rule 3745-31-05(D)	84.47 tons NO _x per rolling 12-month

period for emission units P001,
P002, and P003 combined

see A.2.c

2. Additional Terms and Conditions

- 2.a** The requirements of this rule also include compliance with the requirements of OAC rule 3745-31-05(D).
- 2.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).
- 2.c** The permittee has requested the following federally enforceable restrictions for P001, P002, and P003 combined, in order to avoid Title V and PSD applicability:
- i. 84.47 tons NO_x per rolling 12-month period based on an annual cumulative fuel usage restrictions (see B.3.)

B. Operational Restrictions

1. The permittee shall burn only number two fuel oil in this emissions unit.
2. The quality of the number two fuel oil burned in this emission unit shall meet, on an "as received" basis, a sulfur content and a heat content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.051 lb SO₂/MMBtu of actual heat input.
3. The maximum combined annual number two fuel oil usage for emission units P001, P002, and P003 shall not exceed 511,920 gallons per year, based upon a rolling, 12-month summation of the monthly fuel usage.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the fuel usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Number Two Fuel Usage (gallons)
1	102,384
1-2	204,768
1-3	307,152

1-4	409,536
1-12	511,920

After the first twelve (12) months of operation following issuance of this permit, compliance with the annual number two fuel oil usage limitation shall be based on a rolling, 12-month summation of the monthly fuel usage.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The number two fuel oil usage for each month, in gallons;
 - b. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative fuel usage of each calendar month;
 - c. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the fuel usage;
 - d. The calculated emissions of NO_x, in tons, using the following equation:

$$\text{NO}_x \text{ emissions} = (\text{C.1.a.}) \times (0.33 \text{ lb NO}_x/\text{gal}) \times (1 \text{ ton}/2000 \text{ lbs})$$

The emission factor of 0.33 lb NO_x/gal is based on manufacturer supplied data for this specific generator; and,
 - e. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling 12-month summation of NO_x emissions.
2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emission unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content (lbs/MMBtu) and heat content (Btu/gal) in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval from the Ohio EPA, Northwest District Office.
3. For each shipment of number two fuel oil received for burning in this emissions unit, the permittee shall maintain records of the permittee's or oil supplier's analyses of sulfur content and heat content. The permittee shall use the above information to calculate the lb SO₂/MMBtu heat input

for each shipment received.

4. For each day during which the permittee burns a fuel other than number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emission unit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than number two fuel oil was burned in this emission unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify any record showing an exceedance of the 0.051 lb SO₂/MMBtu limitation. The deviation report shall include a copy of any such record and shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month fuel usage limitation of the emission units, P001, P002, and P003 combined, and for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative number two fuel oil usage. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for one of the emission units contained in this Permit to Install (Emission Unit P001, P002, or P003). The test shall be conducted in accordance with the following requirements:
 - a. The emission testing shall be conducted within 180 days after startup of the first emissions unit contained in this permit to commence operation.
 - b. The test(s) shall be conducted while the emission unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northwest District Office.
 - c. The emission testing shall be conducted to demonstrate compliance with the lbs/hr NO_x emission limitation.
 - d. The following test methods shall be employed to demonstrate compliance with the

allowable mass emission rates: for NO_x, Method 1-4 and 7 of 40 CFR Part 60, Appendix A.

- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission units operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northwest District Offices refusal to accept the results of the emission test(s).
 - f. Personnel from the Ohio EPA Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emission unit and the testing procedures provide a valid characterization of the emissions from the emission unit and/or the performance of the control equipment.
 - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northwest District Office.
2. Compliance with the emission limitations in Section A.1. of the terms and conditions shall be determined in accordance with the following method(s):

- a. Emissions Limitation:
0.036 lb PE/MMBtu heat input
1.26 tons PE/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the heat input emission limitation by dividing a manufacturer supplied emission factor of 0.72 lb PE/hr by the maximum heat input of the emissions unit of 19.8 MMBtu/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by the following:

$$\text{tons PE/yr} = \frac{(0.036 \text{ lb PE/MMBtu}) \times (0.1365 \text{ MMBtu/gal}) \times (511,920 \text{ gals/yr})}{(2000 \text{ lbs/ton})}$$

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Emissions Unit ID: P001

0.036 lb PE/MMBtu = heat input limitation
 0.1365 MMBtu/gal = heat content of number two fuel oil
 511,920 gals/yr = maximum annual number two fuel usage restriction
 2000 lbs/ton = conversion factor

Therefore provided compliance is shown with the heat input limitation and with the maximum annual fuel usage restriction for number two fuel oil, compliance with the annual limitation will be assumed.

- b. Emissions Limitation:
 0.051 lb SO₂/MMBtu heat input
 1.78 tons SO₂/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the heat input limitation by the record keeping required in section C.2 and C.3.

The annual emission limitation was established by the following:

$$\text{tons SO}_2/\text{yr} = \frac{(0.051 \text{ lb SO}_2/\text{MMBtu}) \times (0.1365 \text{ MMBtu/gal}) \times (511,920 \text{ gals/yr})}{(2000 \text{ lbs/ton})}$$

0.051 lb SO₂/MMBtu = heat input limitation
 0.1365 MMBtu/gal = heat content of number two fuel oil
 511,920 gals/yr = maximum annual number two fuel usage restriction
 2000 lbs/ton = conversion factor

Therefore provided compliance is shown with the heat input limitation and with the maximum annual fuel usage restriction for number two fuel oil, compliance with the annual limitation will be assumed.

- c. Emissions Limitation:
 47.69 lbs NO_x/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance by the stack testing required in section E.1.

d. Emissions Limitation:

3.67 lbs CO/hr
6.48 tons CO/yr

Applicable Compliance Method:

The hourly CO emission limitation is based on the emissions unit's potential to emit*, therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

*The potential to emit is based on emissions data from an identical emissions units.

The annual emission limitation was established by the following:

$$\text{tons CO/yr} = \frac{(3.67 \text{ lbs CO/hr}) \times (0.1365 \text{ MMBtu/gal}) \times (511,920 \text{ gals/yr})}{(19.8 \text{ MMBtu/hr}) \times (2000 \text{ lbs/ton})}$$

3.67 lbs PE/hr = hourly potential to emit
0.1365 MMBtu/gal = heat content of number two fuel oil
511,920 gals/yr = maximum annual number two fuel usage restriction
19.8 MMBtu/hr = maximum heat input for generator
2000 lbs/ton = conversion factor

Therefore provided compliance is shown with the maximum annual fuel usage restriction for number two fuel oil, compliance with the annual limitation will be assumed.

e. Emissions Limitation:

1.06 lbs OC/hr
1.87 tons OC/yr

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit*, therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 18, 25, or 25A as applicable of 40 CFR Part 60, Appendix A.

*The potential to emit is based on emissions data from an identical emissions units.

The annual emission limitation was established by the following:

$$\text{tons OC/yr} = \frac{(1.06 \text{ lbs OC/hr}) \times (0.1365 \text{ MMBtu/gal}) \times (511,920 \text{ gals/yr})}{(19.8 \text{ MMBtu/hr}) \times (2000 \text{ lbs/ton})}$$

1.06 lbs OC/hr = hourly potential to emit

0.1365 MMBtu/gal = heat content of number two fuel oil

511,920 gals/yr = maximum annual number two fuel usage restriction

19.8 MMBtu/hr = maximum heat input for generator

2000 lbs/ton = conversion factor

Therefore provided compliance is shown with the maximum annual fuel usage restriction for number two fuel oil, compliance with the annual limitation will be assumed.

- f. Emissions Limitation:
 84.47 tons of NO_x per rolling 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance by the record keeping required in section C.1.

- g. Emission Limitation -
 Visible particulate emissions from this emission unit shall not exceed 10% opacity, as a six-minute average

Applicable Compliance Method -

If required, the permittee shall demonstrate compliance by testing in accordance with Method 9 of 40 CFR Part 60, Appendix A.

- h. Emission Limitation -
 511,920 gallons per rolling 12-month period

Applicable Compliance Method -

The permittee shall demonstrate compliance by the record keeping required in section C.1.

F. Miscellaneous Requirements

Genoa Diesel Generating Station

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Emissions Unit ID: **P001**

1. The following terms and conditions are federally enforceable: A.1, B.3, C.1, D.3, E.1.f.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	OAC rule 3745-31-05(D)
P002 - 3516B Caterpillar number two Fuel Oil-Fired Generator, Unit #2 at 19.8 MMBtu/hr equipped with a Low NO _x Combustion Control Module	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07	
	OAC rule 3745-17-11(B)(5)(b)	
	OAC rule 3745-18-06(G)	

Applicable Emissions
Limitations/Control Measures

see A.2.a

47.69 lbs nitrogen oxides (NO_x)/hr

3.67 lbs carbon monoxide (CO)/hr,
6.48 tons CO/yr

1.06 lbs organic compounds
(OC)/hr, 1.87 tons OC/yr

1.26 tons particulate emissions
(PE)/yr,
0.036 lb PE/MMBtu heat input

1.78 tons sulfur dioxide (SO₂)/yr,
0.051 lb SO₂/MMBtu heat input

Visible particulate emissions shall
not exceed 10% opacity, as a
six-minute average.

see A.2.b

see A.2.b

see A.2.b

84.47 tons NO_x per rolling
12-month period for emission units
P001, P002, and P003 combined

see A.2.c

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule

3745-31-05(D).

- 2.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).
- 2.c** The permittee has requested the following federally enforceable restrictions for P001, P002, and P003 combined, in order to avoid Title V and PSD applicability:
- i. 84.47 tons NO_x per rolling 12-month period based on an annual cumulative fuel usage restrictions (see B.3.)

B. Operational Restrictions

1. The permittee shall burn only number two fuel oil in this emissions unit.
2. The quality of the number two fuel oil burned in this emission unit shall meet, on an "as received" basis, a sulfur content and a heat content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.051 lb SO₂/MMBtu of actual heat input.
3. The maximum combined annual number two fuel oil usage for emission units P001, P002, and P003 shall not exceed 511,920 gallons per year, based upon a rolling, 12-month summation of the monthly fuel usage.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the fuel usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Number Two Fuel Usage (gallons)
1	102,384
1-2	204,768
1-3	307,152
1-4	409,536
1-12	511,920

After the first twelve (12) months of operation following issuance of this permit, compliance with the annual number two fuel oil usage limitation shall be based on a rolling, 12-month summation of the monthly fuel usage.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The number two fuel oil usage for each month, in gallons;
 - b. during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative fuel usage of each calendar month;
 - c. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the fuel usage;
 - d. The calculated emissions of NO_x, in tons, using the following equation:
$$\text{NO}_x \text{ emissions} = (\text{C.1.a.}) \times (0.33 \text{ lb NO}_x/\text{gal}) \times (1 \text{ ton}/2000 \text{ lbs})$$

The emission factor of 0.33 lb NO_x/gal is based on manufacturer supplied data for this specific generator; and,
 - e. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling 12-month summation of NO_x emissions.
2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emission unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content (lbs/MMBtu) and heat content (Btu/gal) in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval from the Ohio EPA, Northwest District Office.
3. For each day during which the permittee burns a fuel other than number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emission unit.
4. For each shipment of number two fuel oil received for burning in this emissions unit, the permittee shall maintain records of the permittee's or oil supplier's analyses of sulfur content and heat content. The permittee shall use the above information to calculate the lb SO₂/MMBtu heat input for each shipment received.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than number two fuel oil was burned in this emission unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify any record showing an exceedance of the 0.051 lb SO₂/MMBtu limitation. The deviation report shall include a copy of any such record and shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month fuel usage limitation of the emission units, P001, P002, and P003 combined, and for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative number two fuel oil usage. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for one of the emission units contained in this Permit to Install (Emission Unit P001, P002, or P003). The test shall be conducted in accordance with the following requirements:
 - a. The emission testing shall be conducted within 180 days after startup of the first emissions unit contained in this permit to commence operation.
 - b. The test(s) shall be conducted while the emission unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northwest District Office.
 - c. The emission testing shall be conducted to demonstrate compliance with the lbs/hr NO_x emission limitation.
 - d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for NO_x, Method 1-4 and 7 of 40 CFR 60.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission units operating parameters, the time(s) and date(s) of the test(s), and the

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person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northwest District Offices refusal to accept the results of the emission test(s).

- f. Personnel from the Ohio EPA Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emission unit and the testing procedures provide a valid characterization of the emissions from the emission unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northwest District Office.
2. Compliance with the emission limitations in Section A.1. of the terms and conditions shall be determined in accordance with the following method(s):

- a. Emissions Limitation:
0.036 lb PE/MMBtu heat input
1.26 tons PE/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the heat input emission limitation by dividing a manufacturer supplied emission factor of 0.72 lb PE/hr by the maximum heat input of the emissions unit of 19.8 MMBtu/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by the following:

$$\text{tons PE/yr} = \frac{(0.036 \text{ lb PE/MMBtu}) \times (0.1365 \text{ MMBtu/gal}) \times (511,920 \text{ gals/yr})}{(2000 \text{ lbs/ton})}$$

0.036 lb PE/MMBtu = heat input limitation

0.1365 MMBtu/gal = heat content of number two fuel oil

511,920 gals/yr = maximum annual number two fuel usage restriction

2000 lbs/ton = conversion factor

Therefore provided compliance is shown with the heat input limitation and with the maximum annual fuel usage restriction for number two fuel oil, compliance with the annual limitation will be assumed.

- b. Emissions Limitation:

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0.051 lb SO₂/MMBtu heat input
1.78 tons SO₂/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the heat input limitation by the recordkeeping required in section C.2 and C.3.

The annual emission limitation was established by the following:

$$\text{tons SO}_2/\text{yr} = \frac{(0.051 \text{ lb SO}_2/\text{MMBtu}) \times (0.1365 \text{ MMBtu/gal}) \times (511,920 \text{ gals/yr})}{(2000 \text{ lbs/ton})}$$

0.051 lb SO₂/MMBtu = heat input limitation

0.1365 MMBtu/gal = heat content of number two fuel oil

511,920 gals/yr = maximum annual number two fuel usage restriction

2000 lbs/ton = conversion factor

Therefore provided compliance is shown with the heat input limitation and with the maximum annual fuel usage restriction for number two fuel oil, compliance with the annual limitation will be assumed.

- c. Emissions Limitation:
47.69 lbs NO_x/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance by the stack testing required in section E.1.

- d. Emissions Limitation:
3.67 lbs CO/hr
6.48 tons CO/yr

Applicable Compliance Method:

The hourly CO emission limitation is based on the emissions unit's potential to emit*, therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

*The potential to emit is based on emissions data from an identical emissions units.

The annual emission limitation was established by the following:

$$\text{tons CO/yr} = \frac{(3.67 \text{ lbs CO/hr}) \times (0.1365 \text{ MMBtu/gal}) \times (511,920 \text{ gals/yr})}{(19.8 \text{ MMBtu/hr}) \times (2000 \text{ lbs/ton})}$$

3.67 lbs PE/hr = hourly potential to emit

0.1365 MMBtu/gal = heat content of number two fuel oil

511,920 gals/yr = maximum annual number two fuel usage restriction

19.8 MMBtu/hr = maximum heat input for generator

2000 lbs/ton = conversion factor

Therefore provided compliance is shown with the maximum annual fuel usage restriction for number two fuel oil, compliance with the annual limitation will be assumed.

e. Emissions Limitation:

1.06 lbs OC/hr

1.87 tons OC/yr

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit*, therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 18, 25, or 25A as applicable of 40 CFR Part 60, Appendix A.

*The potential to emit is based on emissions data from an identical emissions units.

The annual emission limitation was established by the following:

$$\text{tons OC/yr} = \frac{(1.06 \text{ lbs OC/hr}) \times (0.1365 \text{ MMBtu/gal}) \times (511,920 \text{ gals/yr})}{(19.8 \text{ MMBtu/hr}) \times (2000 \text{ lbs/ton})}$$

1.06 lbs OC/hr = hourly potential to emit

0.1365 MMBtu/gal = heat content of number two fuel oil

511,920 gals/yr = maximum annual number two fuel usage restriction

19.8 MMBtu/hr = maximum heat input for generator

2000 lbs/ton = conversion factor

Therefore provided compliance is shown with the maximum annual fuel usage restriction for number two fuel oil, compliance with the annual limitation will be assumed.

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- f. Emissions Limitation:
84.47 tons of NO_x per rolling 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance by the record keeping required in section C.1.

- g. Emission Limitation -
Visible particulate emissions from this emission unit shall not exceed 10% opacity, as a six-minute average

Applicable Compliance Method -

If required, the permittee shall demonstrate compliance by testing in accordance with Method 9 of 40 CFR Part 60, Appendix A.

- h. Emission Limitation -
511,920 gallons per rolling 12-month period

Applicable Compliance Method -

The permittee shall demonstrate compliance by the record keeping required in section C.1.

F. Miscellaneous Requirements

- 1. The following terms and conditions are federally enforceable: A.1., B.3., C.1., D.3., and E.1.f.

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

- 1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements	OAC rule 3745-31-05(D)
P003 - 3516B Caterpillar number two Fuel Oil-Fired Generator, Unit #3 at 19.8 MMBtu/hr equipped with a Low NO _x Combustion Control Module	OAC rule 3745-31-05(A)(3)	
	OAC rule 3745-17-07	
	OAC rule 3745-17-11(B)(5)(b)	
	OAC rule 3745-18-06(G)	

Applicable Emissions
Limitations/Control Measures

see A.2.a

47.69 lbs nitrogen oxides (NO_x)/hr

3.67 lbs carbon monoxide (CO)/hr,
6.48 tons CO/yr

1.06 lbs organic compounds
(OC)/hr, 1.87 tons OC/yr

1.26 tons particulate emissions
(PE)/yr,
0.036 lb PE/MMBtu heat input

1.78 tons sulfur dioxide (SO₂)/yr,
0.051 lb SO₂/MMBtu heat input

Visible particulate emissions shall
not exceed 10% opacity, as a
six-minute average.

see A.2.b

see A.2.b

see A.2.b

84.47 tons NO_x per rolling
12-month period for emission units
P001, P002, and P003 combined

see A.2.c

2. Additional Terms and Conditions

2.a The requirements of this rule also include compliance with the requirements of OAC rule

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3745-31-05(D).

- 2.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).
- 2.c** The permittee has requested the following federally enforceable restrictions for P001, P002, and P003 combined, in order to avoid Title V and PSD applicability:
- i. 84.47 tons NO_x per rolling 12-month period based on an annual cumulative fuel usage restrictions (see B.3.)

B. Operational Restrictions

1. The permittee shall burn only number two fuel oil in this emissions unit.
2. The quality of the number two fuel oil burned in this emission unit shall meet, on an "as received" basis, a sulfur content and a heat content which is sufficient to comply with the allowable sulfur dioxide emission limitation of 0.051 lb SO₂/MMBtu of actual heat input.
3. The maximum combined annual number two fuel oil usage for emission units P001, P002, and P003 shall not exceed 511,920 gallons per year, based upon a rolling, 12-month summation of the monthly fuel usage.

To ensure federal enforceability during the first 12 calendar months of operation following the issuance of this permit, the permittee shall not exceed the fuel usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Number Two Fuel Usage (gallons)
1	102,384
1-2	204,768
1-3	307,152
1-4	409,536
1-12	511,920

After the first twelve (12) months of operation following issuance of this permit, compliance with the annual number two fuel oil usage limitation shall be based on a rolling, 12-month summation of the monthly fuel usage.

C. Monitoring and/or Record keeping Requirements

1. The permittee shall maintain monthly records of the following information:
 - a. The number two fuel oil usage for each month, in gallons;
 - b. During the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative fuel usage of each calendar month;
 - c. Beginning after the first 12 calendar months of operation following issuance of this permit, the rolling, 12-month summation of the fuel usage;
 - d. The calculated emissions of NO_x, in tons, using the following equation:
$$\text{NO}_x \text{ emissions} = (\text{C.1.a.}) \times (0.33 \text{ lb NO}_x/\text{gal}) \times (1 \text{ ton}/2000 \text{ lbs})$$

The emission factor of 0.33 lb NO_x/gal is based on manufacturer supplied data for this specific generator; and,
 - e. beginning after the first 12 calendar months of operation following issuance of this permit, the rolling 12-month summation of NO_x emissions.
2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emission unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content (lbs/MMBtu) and heat content (Btu/gal) in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content; and ASTM method D240 for heat content. Alternative, equivalent methods may be used upon written approval from the Ohio EPA, Northwest District Office.
3. For each day during which the permittee burns a fuel other than number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emission unit.
4. For each shipment of number two fuel oil received for burning in this emissions unit, the permittee shall maintain records of the permittee's or oil supplier's analyses of sulfur content and heat content. The permittee shall use the above information to calculate the lb SO₂/MMBtu heat input

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for each shipment received.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than number two fuel oil was burned in this emission unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports that identify any record showing an exceedance of the 0.051 lb SO₂/MMBtu limitation. The deviation report shall include a copy of any such record and shall be submitted in accordance with the General Terms and Conditions of this permit.
3. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month fuel usage limitation of the emission units, P001, P002, and P003 combined, and for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative number two fuel oil usage. These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

E. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for one of the emission units contained in this Permit to Install (Emission Unit P001, P002, or P003). The test shall be conducted in accordance with the following requirements:
 - a. The emission testing shall be conducted within 180 days after startup of the first emissions unit contained in this permit to commence operation.
 - b. The test(s) shall be conducted while the emission unit is operating at its maximum capacity, unless otherwise specified or approved by the Ohio EPA Northwest District Office.
 - c. The emission testing shall be conducted to demonstrate compliance with the lbs/hr NO_x emission limitation.
 - d. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates: for NO_x, Method 1-4 and 7 of 40 CFR 60.
 - e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emission units operating parameters, the time(s) and date(s) of the test(s), and the

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person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA Northwest District Offices refusal to accept the results of the emission test(s).

- f. Personnel from the Ohio EPA Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emission unit and the testing procedures provide a valid characterization of the emissions from the emission unit and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the Ohio EPA Northwest District Office within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the Ohio EPA Northwest District Office.
2. Compliance with the emission limitations in Section A.1. of the terms and conditions shall be determined in accordance with the following method(s):

- a. Emissions Limitation:
0.036 lb PE/MMBtu heat input
1.26 tons PE/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the heat input emission limitation by dividing a manufacturer supplied emission factor of 0.72 lb PE/hr by the maximum heat input of the emissions unit of 19.8 MMBtu/hr. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-5 of 40 CFR Part 60, Appendix A.

The annual emission limitation was established by the following:

$$\text{tons PE/yr} = \frac{(0.036 \text{ lb PE/MMBtu}) \times (0.1365 \text{ MMBtu/gal}) \times (511,920 \text{ gals/yr})}{(2000 \text{ lbs/ton})}$$

0.036 lb PE/MMBtu = heat input limitation

0.1365 MMBtu/gal = heat content of number two fuel oil

511,920 gals/yr = maximum annual number two fuel usage restriction

2000 lbs/ton = conversion factor

Therefore provided compliance is shown with the heat input limitation and with the maximum annual fuel usage restriction for number two fuel oil, compliance with the annual limitation will be assumed.

- b. Emissions Limitation:

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0.051 lb SO₂/MMBtu heat input
1.78 tons SO₂/yr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the heat input limitation by the record keeping required in section C.2 and C.3.

The annual emission limitation was established by the following:

$$\text{tons SO}_2/\text{yr} = \frac{(0.051 \text{ lb SO}_2/\text{MMBtu}) \times (0.1365 \text{ MMBtu/gal}) \times (511,920 \text{ gals/yr})}{(2000 \text{ lbs/ton})}$$

0.051 lb SO₂/MMBtu = heat input limitation

0.1365 MMBtu/gal = heat content of number two fuel oil

511,920 gals/yr = maximum annual number two fuel usage restriction

2000 lbs/ton = conversion factor

Therefore provided compliance is shown with the heat input limitation and with the maximum annual fuel usage restriction for number two fuel oil, compliance with the annual limitation will be assumed.

- c. Emissions Limitation:
47.69 lbs NO_x/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance by the stack testing required in section E.1.

- d. Emissions Limitation:
3.67 lbs CO/hr
6.48 tons CO/yr

Applicable Compliance Method:

The hourly CO emission limitation is based on the emissions unit's potential to emit*, therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 10 of 40 CFR Part 60, Appendix A.

*The potential to emit is based on emissions data from an identical emissions units.

The annual emission limitation was established by the following:

$$\text{tons CO/yr} = \frac{(3.67 \text{ lbs CO/hr}) \times (0.1365 \text{ MMBtu/gal}) \times (511,920 \text{ gals/yr})}{(19.8 \text{ MMBtu/hr}) \times (2000 \text{ lbs/ton})}$$

3.67 lbs PE/hr = hourly potential to emit

0.1365 MMBtu/gal = heat content of number two fuel oil

511,920 gals/yr = maximum annual number two fuel usage restriction

19.8 MMBtu/hr = maximum heat input for generator

2000 lbs/ton = conversion factor

Therefore provided compliance is shown with the maximum annual fuel usage restriction for number two fuel oil, compliance with the annual limitation will be assumed.

e. Emissions Limitation:

1.06 lbs OC/hr

1.87 tons OC/yr

Applicable Compliance Method:

The hourly OC emission limitation is based on the emissions unit's potential to emit*, therefore, no hourly recordkeeping, deviation reporting, or compliance method calculations are required to demonstrate compliance with this limitation. If required, the permittee shall demonstrate compliance by testing in accordance with Methods 1-4 and 18, 25, or 25A as applicable of 40 CFR Part 60, Appendix A.

*The potential to emit is based on emissions data from an identical emissions units.

The annual emission limitation was established by the following:

$$\text{tons OC/yr} = \frac{(1.06 \text{ lbs OC/hr}) \times (0.1365 \text{ MMBtu/gal}) \times (511,920 \text{ gals/yr})}{(19.8 \text{ MMBtu/hr}) \times (2000 \text{ lbs/ton})}$$

1.06 lbs OC/hr = hourly potential to emit

0.1365 MMBtu/gal = heat content of number two fuel oil

511,920 gals/yr = maximum annual number two fuel usage restriction

19.8 MMBtu/hr = maximum heat input for generator

2000 lbs/ton = conversion factor

Therefore provided compliance is shown with the maximum annual fuel usage restriction for number two fuel oil, compliance with the annual limitation will be assumed.

- f. Emissions Limitation:
84.47 tons of NO_x per rolling 12-month period

Applicable Compliance Method:

The permittee shall demonstrate compliance by the record keeping required in section C.1.

- g. Emission Limitation -
Visible particulate emissions from this emission unit shall not exceed 10% opacity, as a six-minute average

Applicable Compliance Method -

If required, the permittee shall demonstrate compliance by testing in accordance with Method 9 of 40 CFR Part 60, Appendix A.

- h. Emission Limitation -
511,920 gallons per rolling 12-month period

Applicable Compliance Method -

The permittee shall demonstrate compliance by the record keeping required in section C.1.

F. Miscellaneous Requirements

- 1. The following terms and conditions are federally enforceable: A.1., B.3., C.1., D.3., and E.1.f.