State of Ohio Environmental Protection Agency

Street Address: Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329 Mailing Address: Lazarus Gov. Center

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
WILLIAMS COUNTY
Application No: 03-13393
DATE: 3/1/00

American Municipal Power
Randy Meyer
2600 Airport Drive
Columbus, OH 43219

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$1200** will be due. Please do not submit any payment now.

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. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Very truly yours,

Thomas G. Rigo

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

CC: **USEPA** **NWDO**
IN **MI**

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: To be entered upon final issuance**
Terms and Conditions	**Effective Date: To be entered upon final issuance**

DRAFT PERMIT TO INSTALL 03-13393

Application Number:	03-13393
APS Premise Number:	0386000071
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	American Municipal Power
Person to Contact:	Randy Meyer
Address:	2600 Airport Drive Columbus, OH 43219

Location of proposed air contaminant source(s) [emissions unit(s)]:
127 Industrial Drive
Edgerton, **Ohio**

Description of proposed emissions unit(s):
3 17.53 mmBTU/hr internal combustion engines.

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 Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping 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 recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the 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 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 Environmental Protection Agency if the proposed sources are inadequate 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 prove to be inadequate 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.

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

Pollutant	Tons Per Year
PE	1.95
NOx	85.83
SO2	1.59
VOC	1.92
CO	6.60

PART II - SPECIAL TER
MS 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	Applicable Emissions Limitations/Control Measures
17.53 mmBTU/hr #2 oil (fuel) fired diesel generator	OAC rule 3745-31-05(D)	28.61 tons NOx per rolling 12-month period
	OAC rule 3745-31-05(A)(3)	2.72 lb Nox/mmBTU, 47.69 lb NOx/hr; 3.67 lb CO/hr, 2.20 TPY CO, 0.21 lb CO/mmBTU; 1.06 lb VOC/hr, 0.64 TPY VOC, 0.06 lb VOC/mmBTU; 0.89 lb SO_2/hr, 0.53 TPY SO_2, 0.05 lb SO_2/mmBTU; 1.09 lb PE/hr, 0.65 TPY PE
	OAC rule 3745-17-11(B)(5)(b)	0.062 lb PE/mm BTU
	OAC rule 3745-17-07	20% opacity as a 6-minute average except as provided by rule.
	OAC rule 3745-18-06 (G)	None. See Additional Terms and Conditions, Section A.2.a.

2. Additional Terms and Conditions

2.a Applicable requirements established by this OAC Rule are less stringent than the requirements established by OAC Rule 3745-31-05.

B. Operational Restrictions

1. The permittee shall burn only number two fuel oil in this emission unit.

2. The maximum annual fuel usage for this emissions unit shall not exceed 154,080 gallons per year, based upon a rolling, 12-month summation of the fuel usage.

   To ensure 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	Maximum Allowable Cumulative Fuel Usage (gallons)
1	13,000
1-2	26,000
1-3	39,000
1-4	52,000
1-5	65,000
1-6	78,000
1-7	91,000
1-8	104,000
1-9	117,000
1-10	130,000
1-11	143,000
1-12	154,080

   After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual fuel usage limitation shall be based upon a rolling, 12-month summation of the fuel usage.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:

   a. The fuel usage for each month.

b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the fuel usage.

c. The calculated emissions of all pollutants.

d. The year-to-date summation of all pollutants, in TPY.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative fuel usage for each calendar month.

2. 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 emissions unit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month fuel usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative fuel usage levels. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).

2. The permittee shall submit deviation (excursion) reports that identify each day in which a fuel other than number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall also submit annual reports which specify the total nitrogen oxide emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year

E. Testing Requirements/Compliance Methods Determination

1. The permittee shall conduct, or have conducted, emission testing for <u>one</u> of these emissions units contained in this Permit to Install (03-13393; EUs P001-P003). The results of this test will be used to demonstrate compliance with the allowable emissions rates of all of the diesel generators (P001-P003) located at the facility. The test shall be conducted in accordance with the following requirements:

a. The emission testing shall be conducted within 180 days after issuance of the permit and within 6 months prior to permit renewal.

b. The emission testing shall be conducted on one of the emission units to demonstrate

compliance with the allowable mass emission rates for all emitted pollutants (NOx, particulates, SO_2, carbon monoxide, and organic compounds).

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

Pollutant	Applicable USEPA Test Method*
NOx	Method 7
PM	Method 5
SO_2	Method 6
CO	Method 10
VOC	Method 18, 25, or 25A

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

*Applicable USEPA Test Methods can be found in 40 CFR Part 60, Appendix A

d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

a. **Emission Limitation**
2.72 lbs NOx/mmBTU, 47.69 lbs NOx/hr
0.21 lb CO/mmBTU, 3.67 lbs CO/hr
0.06 lb VOC/mmBTU, 1.06 lbs VOC/hr
0.062 lb PE/mmBTU, 1.09 lbs PE/hr
0.05 lb SO_2 /mmBTU, 0.89 lbs SO_2/hr

Applicable Compliance Method
The permittee shall demonstrate compliance with the emissions limitations based on the results of the stack test on the emissions unit, or a similar emissions unit, as required in section E.1.

b. **Emission Limitation**
14.31 tons NOx per rolling 12-month period
1.11 TPY CO
0.32 TPY VOC
0.27 TPY SO_2
0.32 TPY PE

Applicable Compliance Method
Compliance with the TPY limits will be demonstrated through the recordkeeping required in section C.1. of the terms and conditions of this permit.

c. **Emission Limitation**
20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method
OAC 3745-17-03 (B)(1)

F. Miscellaneous Requirements

None.

Emissions Unit ID: **P002**

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	Applicable Emissions Limitations/Control Measures
17.53 mmBTU/hr #2 oil (fuel) fired diesel generator	OAC rule 3745-31-05(D)	28.61 tons NOx per rolling 12-month period
	OAC rule 3745-31-05(A)(3)	2.72 lb Nox/mmBTU, 47.69 lb NOx/hr; 3.67 lb CO/hr, 2.20 TPY CO, 0.21 lb CO/mmBTU; 1.06 lb VOC/hr, 0.64 TPY VOC, 0.06 lb VOC/mmBTU; 0.89 lb SO_2/hr, 0.53 TPY SO_2, 0.05 lb SO_2/mmBTU; 1.09 lb PE/hr, 0.65 TPY PE
	OAC rule 3745-17-11(B)(5)(b)	0.062 lb PE/mm BTU
	OAC rule 3745-17-07	20% opacity as a 6-minute average except as provided by rule.
	OAC rule 3745-18-06 (G)	None. See Additional Terms and Conditions, Section A.2.a.

2. Additional Terms and Conditions

2.a Applicable requirements established by this OAC Rule are less stringent than the requirements established by OAC Rule 3745-31-05.

B. Operational Restrictions

1. The permittee shall burn only number two fuel oil in this emission unit.

2. The maximum annual fuel usage for this emissions unit shall not exceed 154,080 gallons per year, based upon a rolling, 12-month summation of the fuel usage.

   To ensure 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	Maximum Allowable Cumulative Fuel Usage (gallons)
1	13,000
1-2	26,000
1-3	39,000
1-4	52,000
1-5	65,000
1-6	78,000
1-7	91,000
1-8	104,000
1-9	117,000
1-10	130,000
1-11	143,000
1-12	154,080

   After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual fuel usage limitation shall be based upon a rolling, 12-month summation of the fuel usage.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:

   a. The fuel usage for each month.

   b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the fuel usage.

   c. The calculated emissions of all pollutants.

d. The year-to-date summation of all pollutants, in TPY.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative fuel usage for each calendar month.

2. 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 emissions unit.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month fuel usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative fuel usage levels. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).

2. The permittee shall submit deviation (excursion) reports that identify each day in which a fuel other than number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall also submit annual reports which specify the total nitrogen oxide emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year

E. Testing Requirements/Compliance Methods Determination

1. The permittee shall conduct, or have conducted, emission testing for <u>one</u> of these emissions units contained in this Permit to Install (03-13393; EUs P001-P003). The results of this test will be used to demonstrate compliance with the allowable emissions rates of all of the diesel generators (P001-P003) located at the facility. The test shall be conducted in accordance with the following requirements:

   a. The emission testing shall be conducted within 180 days after issuance of the permit and within 6 months prior to permit renewal.

   b. The emission testing shall be conducted on one of the emission units to demonstrate compliance with the allowable mass emission rates for all emitted pollutants (NOx, particulates, SO_2, carbon monoxide, and organic compounds).

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

Pollutant	Applicable USEPA Test Method*
NOx	Method 7
PM	Method 5
SO_2	Method 6
CO	Method 10
VOC	Method 18, 25, or 25A

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

*Applicable USEPA Test Methods can be found in 40 CFR Part 60, Appendix A

d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

a. **Emission Limitation**
2.72 lbs NOx/mmBTU, 47.69 lbs NOx/hr
0.21 lb CO/mmBTU, 3.67 lbs CO/hr
0.06 lb VOC/mmBTU, 1.06 lbs VOC/hr
0.062 lb PE/mmBTU, 1.09 lbs PE/hr
0.05 lb SO_2 /mmBTU, 0.89 lbs SO_2/hr

Applicable Compliance Method
The permittee shall demonstrate compliance with the emissions limitations based on the results of the stack test on the emissions unit, or a similar emissions unit, as required in section E.1.

b. **Emission Limitation**
14.31 tons NOx per rolling 12-month period
1.11 TPY CO
0.32 TPY VOC
0.27 TPY SO_2
0.32 TPY PE

Applicable Compliance Method
Compliance with the TPY limits will be demonstrated through the recordkeeping required in section C.1. of the terms and conditions of this permit.

c. **Emission Limitation**
20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method
OAC 3745-17-03 (B)(1)

F. Miscellaneous Requirements

None.

Emissions Unit ID: **P003**

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	Applicable Emissions Limitations/Control Measures
17.53 mmBTU/hr #2 oil (fuel) fired diesel generator	OAC rule 3745-31-05(D)	47.69 lb NOx/hr, 28.61 tons NOx per rolling 12-month period
	OAC rule 3745-31-05(A)(3)	2.72 lb NOx/mmBTU; 3.67 lb CO/hr, 2.20 TPY CO, 0.21 lb CO/mmBTU; 1.06 lb VOC/hr, 0.64 TPY VOC, 0.06 lb VOC/mmBTU; 0.89 lb SO_2/hr, 0.53 TPY SO_2, 0.05 lb SO_2/mmBTU; 1.09 lb PE/hr, 0.65 TPY PE
	OAC rule 3745-17-11(B)(5)(b)	0.062 lb PE/mm BTU
	OAC rule 3745-17-07	20% opacity as a 6-minute average except as provided by rule.
	OAC rule 3745-18-06 (G)	None. See Additional Terms and Conditions, Section A.2.a.

2. Additional Terms and Conditions

2.a Applicable requirements established by this OAC Rule are less stringent than the requirements established by OAC Rule 3745-31-05.

B. Operational Restrictions

1. The permittee shall burn only number two fuel oil in this emission unit.

2. The maximum annual fuel usage for this emissions unit shall not exceed 154,080 gallons per year, based upon a rolling, 12-month summation of the fuel usage.

   To ensure 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	Maximum Allowable Cumulative Fuel Usage (gallons)
1	13,000
1-2	26,000
1-3	39,000
1-4	52,000
1-5	65,000
1-6	78,000
1-7	91,000
1-8	104,000
1-9	117,000
1-10	130,000
1-11	143,000
1-12	154,080

   After the first 12 calendar months of operation following the issuance of this permit, compliance with the annual fuel usage limitation shall be based upon a rolling, 12-month summation of the fuel usage.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall maintain monthly records of the following information:

   a. The fuel usage for each month.

   b. Beginning after the first 12 calendar months of operation following the issuance of this permit, the rolling, 12-month summation of the fuel usage.

   c. The calculated emissions of all pollutants.

d. The year-to-date summation of all pollutants, in TPY.

Also, during the first 12 calendar months of operation following the issuance of this permit, the permittee shall record the cumulative fuel usage for each calendar month.

2. 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 emissions unit.

3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received and the permittee's or oil supplier's analyses for sulfur content and heat content.

4. 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 emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content 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 by the appropriate Ohio EPA District Office or local air agency.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month fuel usage limitation and, for the first 12 calendar months of operation following the issuance of this permit, all exceedances of the maximum allowable cumulative fuel usage levels. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).

2. The permittee shall submit deviation (excursion) reports that identify each day in which a fuel other than number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

3. The permittee shall also submit annual reports which specify the total nitrogen oxide emissions from this emissions unit for the previous calendar year. These reports shall be submitted by January 31 of each year

E. Testing Requirements/Compliance Methods Determination

1. The permittee shall conduct, or have conducted, emission testing for <u>one</u> of these emissions units contained in this Permit to Install (03-13147; EUs P001-P003). The results of this test will be

used to demonstrate compliance with the allowable emissions rates of all of the diesel generators (P001-P003) located at the facility. The test shall be conducted in accordance with the following requirements:

a. The emission testing shall be conducted within 180 days after issuance of the permit and within 6 months prior to permit renewal.

b. The emission testing shall be conducted on one of the emission units to demonstrate compliance with the allowable mass emission rates for all emitted pollutants (NOx, particulates, SO_2, carbon monoxide, and organic compounds).

c. The following test methods shall be employed to demonstrate compliance with the allowable mass emission rates:

Pollutant	Applicable USEPA Test Method*
NOx	Method 7
PM	Method 5
SO_2	Method 6
CO	Method 10
VOC	Method 18, 25, or 25A

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

*Applicable USEPA Test Methods can be found in 40 CFR Part 60, Appendix A

d. The test shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control

equipment.

A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.

2. Compliance with the emission limitation(s) in Section A.1. of these terms and conditions shall be determined in accordance with the following method(s):

a. **Emission Limitation**
2.72 lbs NOx/mmBTU, 47.69 lbs NOx/hr
0.21 lb CO/mmBTU, 3.67 lbs CO/hr
0.06 lb VOC/mmBTU, 1.06 lbs VOC/hr
0.062 lb PE/mmBTU, 1.09 lbs PE/hr
0.05 lb SO_2 /mmBTU, 0.89 lbs SO_2/hr

Applicable Compliance Method
The permittee shall demonstrate compliance with the emissions limitations based on the results of the stack test on the emissions unit, or a similar emissions unit, as required in section E.1.

b. **Emission Limitation**
14.31 tons NOx per rolling 12-month period
1.11 TPY CO
0.32 TPY VOC
0.27 TPY SO_2
0.32 TPY PE

Applicable Compliance Method
Compliance with the TPY limits will be demonstrated through the recordkeeping required in section C.1. of the terms and conditions of this permit.

c. **Emission Limitation**
20% opacity, as a 6-minute average, except as provided by rule.

Applicable Compliance Method
OAC 3745-17-03 (B)(1)

F. Miscellaneous Requirements

None.

Emissions Unit ID: **P003**

NEW SOURCE REVIEW FORM B

PTI Number: 03-13388 Facility ID: 0317030059

FACILITY NAME American Municipal Power

FACILITY DESCRIPTION 3 17.53 mmBTU/hr Internal Combustion Engines CITY/TWP Galion

SIC CODE 4911 SCC CODE EMISSIONS UNIT ID P001

EMISSIONS UNIT DESCRIPTION 17.53 mmBTU/hr Internal Combustion Engine

DATE INSTALLED Not Installed

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.72 lb/hr	0.43	1.09 lb/hr	0.65
PM_{10}					
Sulfur Dioxide	Attainment	0.89 lb/hr	0.53	0.89 lb/hr	0.65
Organic Compounds	Attainment	1.06 lb/hr	0.64	1.06 lb/hr	0.64
Nitrogen Oxides	Attainment	47.69 lbs/hr	28.61	47.69 lbs/hr	28.61
Carbon Monoxide	Attainment	3.67 lbs/hr	2.20	3.67 lbs/hr	2.20
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Compliance with the terms and conditions in this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 03-13388 Facility ID: 0317030059

FACILITY NAME American Municipal Power

FACILITY DESCRIPTION 3 17.53 mmBTU/hr Internal Combustion CITY/TWP Galion

Emissions Unit ID: **P003**

SIC CODE 4911 SCC CODE EMISSIONS UNIT ID P002

EMISSIONS UNIT DESCRIPTION 17.53 mmBTU/hr Internal Combustion Engine

DATE INSTALLED Not Installed

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.72 lb/hr	0.43	1.09 lb/hr	0.65
PM_{10}					
Sulfur Dioxide	Attainment	0.89 lb/hr	0.53	0.89 lb/hr	0.65
Organic Compounds	Attainment	1.06 lb/hr	0.64	1.06 lb/hr	0.64
Nitrogen Oxides	Attainment	47.69 lbs/hr	28.61	47.69 lbs/hr	28.61
Carbon Monoxide	Attainment	3.67 lbs/hr	2.20	3.67 lbs/hr	2.20
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Compliance with the terms and conditions in this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 03-13388 Facility ID: 0317030059

FACILITY NAME American Municipal Power

FACILITY DESCRIPTION 3 17.53 mmBTU/hr Internal Combustion CITY/TWP Galion

Emissions Unit ID: **P003**

SIC CODE 4911 SCC CODE EMISSIONS UNIT ID P003

EMISSIONS UNIT DESCRIPTION 17.53 mmBTU/hr Internal Combustion Engine

DATE INSTALLED Not Installed

EMISSIONS: (Click on bubble help for Air Quality Descriptions)

Pollutants	Air Quality Description	Actual Emissions Rate		PTI Allowable	
		Short Term Rate	Tons Per Year	Short Term Rate	Tons Per Year
Particulate Matter	Attainment	0.72 lb/hr	0.43	1.09 lb/hr	0.65
PM_{10}					
Sulfur Dioxide	Attainment	0.89 lb/hr	0.53	0.89 lb/hr	0.65
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Carbon Monoxide	Attainment	3.67 lbs/hr	2.20	3.67 lbs/hr	2.20
Lead					
Other: Air Toxics					

APPLICABLE FEDERAL RULES:

NSPS? NESHAP? PSD? OFFSET POLICY?

WHAT IS THE BAT DETERMINATION, AND WHAT IS THE BASIS FOR THE DETERMINATION?
Compliance with the terms and conditions in this permit

IS THIS SOURCE SUBJECT TO THE AIR TOXICS POLICY? No

OPTIONAL: WHAT IS THE CAPITAL COST OF CONTROL EQUIPMENT? $ N/A

TOXIC AIR CONTAMINANTS

Ohio EPA's air toxics policy applies to contaminants for which the American Conference of Governmental Industrial Hygienists (ACGIH) has a listed threshold limit value.

AIR TOXICS MODELING PERFORMED*? _____ YES X NO

IDENTIFY THE AIR CONTAMINANTS: _____

NEW SOURCE REVIEW FORM B

PTI Number: 03-13388 Facility ID: 0317030059

FACILITY NAME American Municipal Power

FACILITY DESCRIPTION 3 17.53 mmBTU/hr Internal Combustion CITY/TWP Galion

Emissions Unit ID: **P003**

Please describe any hard copy information is being submitted with this recommendation (Please send hard copy information to Pam McGraner, DAPC Central Office - Air Quality Modeling and Planning):

NONE

Please provide any additional permit specific notes as you deem necessary:

NONE

Permit To Install Synthetic Minor Write-Up

A.Source Description

AMP-Ohio plans to install three diesel generators at its Edgerton Diesel Peaking Station. These generators will be used during peaking only, primarily during the months of December through February and June through August.

B.Facility Emissions/Attainment Status

The facility is potentially a major stationary source for NOx emissions. Williams County is attainment for this pollutant. The facility has minor emissions of the other criteria pollutants.

C.New Source Emissions

Potential emissions from each generator is as follows:

	P001	P002	P003	Total
NOx [lb/hr]	47.69	47.69	47.69	
NOx [TPY @ 8760 hr/yr]	208.88	208.88	208.88	626.64

AMP-Ohio has proposed to limit the fuel usage of these three units to 154,080 gal/yr [per emission unit]. With these federally enforceable operating restrictions, the potential to emit will be:

	P001	P002	P005	Total
NOx [lb/hr]	47.69	47.69	47.69	
NOx [TPY @ 154,080 gal/yr]	28.61	28.61	28.61	85.83

D.Conclusion

With the restrictions in the fuel usage for emission units P001 - P003, the NOx emissions will be less than 100 TPY. Therefore, this facility will not be subject to Title V or PSD review.

Please fill in the following for this permit:

TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant **Tons Per Year**

28 **NEW SC**

PTI Num

FACILIT

Emissions Unit ID: **P003**

FACILITY DESCRIPTION	3 17.53 mmBTU/hr Internal Combustion Engines	CITY/TWP	Galion

PE	**1.95**
NOx	**85.83**
SO2	**1.59**
VOC	**1.92**
CO	**6.60**