State of Ohio Environmental Protection Agency

Street Address:
Lazarus Gov. Center
122 S. Front Street
Columbus, OH 43215

TELE: (614) 644-3020 **FAX:** (614) 644-2329

Mailing Address:
Lazarus Gov. Center
P.O. Box 1049
Columbus, OH 43216-1049

RE: FINAL PERMIT TO INSTALL
UNION COUNTY
Application No: 01-08882
Fac ID: 0180000130

DATE: 2/15/2005

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
Y	**SYNTHETIC MINOR**
	CEMS
Subpart ZZZZ	**MACT**
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

Honda of America Mfg., Inc.
Dave Boeckman
19900 State Route 739
Marysville, OH 43040

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
309 South Fourth Street, Room 222
Columbus, Ohio 43215

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: USEPA CDO

STATE OF OHIO ENVIRONMENTAL PROTECTION AGENCY

Permit To Install	**Issue Date: 2/15/2005**
Terms and Conditions	**Effective Date: 2/15/2005**

FINAL PERMIT TO INSTALL 01-08882

Application Number: 01-08882

Facility ID: 0180000130

Permit Fee: **$800**

Name of Facility: Honda of America Mfg., Inc.

Person to Contact: Dave Boeckman

Address: 19900 State Route 739
Marysville, OH 43040

Location of proposed air contaminant source(s) [emissions unit(s)]:
24000 Honda Parkway
Marysville, **Ohio**

Description of proposed emissions unit(s):
Generators.

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

Joseph P. Koncelik

Director

Part I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, 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.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written 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. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. 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, i.e., upset, 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. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or

condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. 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.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or

modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. 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 ninety (90) days after commencing operation of the source(s) covered by this permit.

11. 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.

12. 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.

B. State Only Enforceable 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

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable 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 state-only required 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. 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.

4. 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.

5. 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 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.

6. 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.

7. 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).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form if applicable) 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.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

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.

C. 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
NOx	5.12
CO	1.17
SO2	0.45
PE	0.36
VOC	0.34

Part II - FACILITY SPECIFIC TERMS AND CONDITIONS

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

1. In accordance with the 40 CFR Part 63, Subpart ZZZZ final MACT rule for "Stationary Reciprocating Internal Combustion Engines," emissions unit B418 is considered a "new limited use stationary reciprocating internal combustion engine" and therefore is not required to meet the requirements of the subpart and of 40 CFR 63, Subpart A except for the initial notification requirements of 63.6645(d). It is considered "limited use" because it is operated less than 100 hours per year.

   As specified in Subpart ZZZZ, the permittee shall submit the following notification:

   a. The permittee shall submit an Initial Notification Report that contains the following information, in accordance with 40 CFR Part 63.9(b)(2) not later than December 13, 2004:

      i. the name and mailing address of the permittee;

      ii. the physical location of the source if it is different from the mailing address;

      iii. identification of the relevant MACT standard and the source's compliance date;

      iv. a brief description of the nature, design, size, and method of operation of the source, and an identification of the types of emission points within the affected source subject to the relevant standard and the types of HAPs emitted; and

      v. a statement confirming the facility is a major source for HAPs.

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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
B418 - 1073 HP stationary diesel emergency generator	OAC rule 3745-31-05(A)(3)	Emissions from this emissions unit shall not exceed: 25.34 pounds per hour (lbs/hr) of nitrogen oxides (NOx); 6.73 lbs/hr of carbon monoxide (CO); 2.77 lb/hr of particulate emissions (PE); 4.00 lbs/hr of sulfur dioxide (SO_2); and 0.65 lb/hr of volatile organic compounds (VOC). The requirements of this rule also includes compliance with the requirements of OAC rules 3745-31-05(C), 3745-17-11(B)(5)(b), and 3745-17-07(A).
	OAC rule 3745-31-05(C)	Emissions from this emissions unit shall not exceed the following limitations, as a 12-month rolling summation: 1.27 tons of NOx; 0.34 ton of CO; 0.20 ton of SO_2; 0.14 ton of PE; and 0.03 ton of VOC See Section A.II.2 below.
	OAC rule 3745-17-07(A)(1)	Visible emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

OAC rule 3745-17-11(B)(5)(b)	PE from the engine's exhaust shall not exceed 0.35 lb/mmBtu actual heat input. See Section A.2.b. below.
OAC rule 3745-18-06 (G)	Exempt, pursuant to OAC rule 3745-18-06(B) because rated heat input capacity is less than 10 mmBtu/hr.
OAC rule 3745-21-08(B)	See Section II.A.2.c below.
OAC rule 3745-23-06(B)	See Section II.A.2.d below.
40 CFR Part 63, Subpart ZZZZ	See Section II.A.1 of the Facility Specific Terms and Conditions.

2. Additional Terms and Conditions

2.a The hourly emissions limitations for this emissions unit were established to reflect the potential to emit. Therefore, with the exception of the fuel oil analysis, it is not necessary to develop additional monitoring, record keeping, and/or reporting requirements to ensure compliance with these limits.

2.b This limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that the limitation be modified to 0.062 lb PE/mmBtu of actual heat input but the new limitation will not become effective until it is approved by U.S. EPA as a revision to the Ohio SIP for particulate matter.

2.c The design of the emissions unit and the technology associated with the current operating practices will satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's SIP. Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

2.d The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

2.e In accordance with the 40 CFR Part 63, Subpart ZZZZ final MACT rule for "Stationary Reciprocating Internal Combustion Engines," this emissions unit is considered an "new limited use stationary reciprocating internal combustion engine" and therefore is not required to meet the requirements of the subpart and of 40 CFR 63, Subpart A except for the initial

notification requirements of 63.6645(d). It is considered "limited use" because it is operated less than 100 hours per year.

II. Operational Restrictions

1. The permittee shall only burn diesel fuel, containing no greater than 0.5% sulfur by weight, in this emissions unit.

2. The maximum annual operating hours for this emissions unit shall not exceed 100 hours based upon a 12- month rolling summation. The permittee has existing records of the hours of operation for this emissions unit; therefore, the first year of accumulating monthly hours of operation limitation is not necessary.

III. Monitoring and/or Recordkeeping Requirements

1. For each shipment of diesel fuel (no. 2 fuel oil) received for burning in this emissions unit, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated SO2 emission rate (in lbs/mmBtu). The SO2 emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

   The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as, ASTM methods D240 and D4294), or equivalent methods as approved by the Director.

2. For each day during which the permittee burns a fuel other than diesel fuel in this emissions unit, the permittee shall maintain a record of the type and quantity of fuel burned.

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

   a. the total number of hours of operation of B418 for each month; and

   b. the rolling 12-month summation of the hours of operation, calculated by adding the current month's hours of operation to the hours of operation for the preceding eleven calendar months.

IV. Reporting Requirements

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

2. The permittee shall submit quarterly deviation (excursion) reports which identify the following:

a. any exceedance of the rolling 12-month maximum allowable cumulative hours of operation; and

b. any exceedance of the sulfur content fuel restriction specified in Section A.II.1 above.

These deviation (excursion) reports shall be submitted in accordance with the Part I - General Terms and Conditions of this permit.

V. Testing Requirements

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

a. Emission Limitations:
25.34 lbs NOx/hr
6.73 lbs CO/hr
2.77 lb PE/hr*
4.00 lbs SO2/hr
0.65 lb VOC/hr

Applicable Compliance Method:
The above hourly limitations were established by multiplying the hourly heat input rating for the diesel generator of 7.92 mmBtu/hr by the appropriate emission factor below from U.S. EPA's AP-42, Volume I, Fifth Edition, Section 3.4, "Large Stationary diesel and All Stationary Dual-fuel Engines", Table 3.4-1, October 1996.

Pollutant	Emission Factor
NOx	3.2 lbs/mmBtu
CO	0.85 lb/mmBtu
PE*	0.35 lb/mmBtu
SO2	1.01 x (% sulfur content by weight, 0.5) lb/mmBtu
VOC	0.0819 lb/mmBtu

If required, emissions testing shall be conducted using the following test methods: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for PE, Method 7E for NOx, Method 10 for CO, Method 6C for SO2 and Methods 18, 25, or 25A for VOC. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Central District Office.

*See Section A.V.1.c.

b. Emission Limitations:
1.27 tons of NOx per rolling, 12-month period
0.34 tons of CO per rolling, 12-month period
0.20 ton of SO_2 per rolling, 12-month period
0.14 ton of PE per rolling, 12-month period
0.03 ton of VOC per rolling, 12-month period

Applicable Compliance Method:
The annual emission limitations were established by multiplying the maximum hourly emission rate determined in Section A.V.1.a above by the maximum allowable hours of operation of 100 hours per rolling, 12-month period.

c. Emission Limitation:
Particulate emissions from the engine exhaust shall not exceed 0.35 lb/mmBtu actual heat input

Applicable Compliance Method:
Compliance shall be determined based on the emission factor of 0.35 lb/mmBtu specified in Section A.1. This limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitation:
Visible emissions shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A. Method 9 and the procedures are specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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
B418 - 1073 HP stationary diesel emergency generator	OAC rule 3745-17-11(B)(5)(b)	PE from the engine's exhaust shall not exceed 0.062 lb/mmBtu actual heat input. See Section A.2.a below.

2. Additional Terms and Conditions

2.a This particulate emission limitation shall be effective and federally enforceable on the date the U.S. EPA approves this particulate emission limitation as a revision to the Ohio SIP for particulate matter.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I. of these terms and conditions shall be determined in accordance with the following method(s);

Emission Limitation:
PE from the engine's exhaust shall not exceed 0.062 lb/mmBtu actual heat input

Applicable Compliance Method:
Compliance shall be determined based on the emission factor of 0.062 lb/mmBtu specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.4-1 (10/96) for "Large Stationary diesel and All Stationary Dual-fuel Engines".

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

VI. Miscellaneous Requirements

1. The emission limitation of OAC rule 3745-17-11(B)(5) became effective with the January 31, 1998, rule revisions. The revision failed to account for these types of engines. For this and other reasons, Ohio will be revising this rule in the near future. The revisions will account for these types of emissions units.

   The January 31, 1998, rule revision is not part of Ohio's approved State Implementation Plan (SIP). For this reason, the rule is only identified within Part III-Section B. of the permit.

Part III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. State and Federally Enforceable Section

I. 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
B419 - 469 HP stationary diesel emergency generator	OAC rule 3745-31-05(A)(3)	Emissions from this emissions unit shall not exceed: 15.41 pounds per hour (lbs/hr) of nitrogen oxides (NOx); 3.32 lbs/hr of carbon monoxide (CO); 0.87 lb/hr of particulate emissions (PE); 1.01 lbs/hr of sulfur dioxide (SO_2); and 1.26 lbs/hr of volatile organic compounds (VOC) The requirements of this rule also includes compliance with the requirements of OAC rules 3745-31-05(C), 3745-17-11(B)(5)(b), and 3745-17-07(A).
	OAC rule 3745-31-05(C)	Emissions from this emissions unit shall not exceed the following limitations, as a 12 month rolling summation: 3.85 tons of NOx; 0.83 ton of CO; 0.25 ton of SO_2; 0.22 ton of PE; and 0.31 ton of VOC See Section A.II.2 below.
	OAC rule 3745-17-07(A)(1)	Visible emissions shall not exceed 20% opacity as a six-minute average, except as provided by rule.

OAC rule 3745-17-11(B)(5)(b)	PE from the engine's exhaust shall not exceed 0.25 lb/mmBtu actual heat input. See Section A.2.b. below.
OAC rule 3745-18-06 (G)	Exempt, pursuant to OAC rule 3745-18-06(B) because rated heat input capacity is less than 10 mmBtu/hr.
OAC rule 3745-21-08(B)	See Section A.2.c below.
OAC rule 3745-23-06(B)	See Section A.2.d below.

2. Additional Terms and Conditions

2.a The hourly emissions limitations for this emissions unit were established to reflect the potential to emit. Therefore, with the exception of the fuel oil analysis, it is not necessary to develop additional monitoring, record keeping, and/or reporting requirements to ensure compliance with these limits.

2.b This limitation reflects the current State Implementation Plan (SIP) for Ohio approved by the U.S. EPA. Ohio EPA has requested that the limitation be modified to 0.310 lb PE/mmBtu of actual heat input but the new limitation will not become effective until it is approved by U.S. EPA as a revision to the Ohio SIP for particulate matter.

2.c The design of the emissions unit and the technology associated with the current operating practices will satisfy the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08.

On November 5, 2002, OAC rule 3745-21-08 was revised to delete paragraph (B); therefore, paragraph (B) is no longer part of the State regulations. However, that rule revision has not yet been submitted to the U.S. EPA as a revision to Ohio's SIP. Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-21-08, the requirement to satisfy the "best available control techniques and operating practices" still exists as part of the federally-approved SIP for Ohio.

2.d The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in this permit to install.

II. Operational Restrictions

1. The permittee shall only burn diesel fuel in this emissions unit.

2. The maximum annual operating hours for this emissions unit shall not exceed 500 hours, based upon rolling, 12 month summation of the operating hours. The permittee has existing records of the hours

of operation for this emissions unit; therefore, the first year of accumulating monthly hours of operation limitation is not necessary.

III. Monitoring and/or Recordkeeping Requirements

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

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

   a. the total number of hours of operation of B419 for each month; and

   b. the rolling 12-month summation of the hours of operation, calculated by adding the current month's hours of operation to the hours of operation for the preceding eleven calendar months.

IV. Reporting Requirements

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

2. The permittee shall submit quarterly deviation (excursion) reports which identify any exceedance of the rolling 12-month maximum allowable cumulative hours of operation. The deviation (excursion) report shall be submitted in accordance with the Part I - General Terms and Conditions of this permit.

V. Testing Requirements

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

   a. Emission Limitations:
   15.41 lbs of NOx/hr
   3.32 lbs of CO/hr
   0.87 lb of PE/hr*
   1.01 lbs of SO_2/hr
   1.26 lbs of VOC/hr

   Applicable Compliance Method:
   The above hourly limitations were established by multiplying the hourly heat input rating for the diesel generator of 3.49 mmBtu/hr by the appropriate emission factor below from U.S. EPA's AP-42, Volume I, Fifth Edition, Section 3.3, "Gasoline and Diesel Industrial Engines", Table 3.3-1, October 1996.

   <u>Pollutant</u> <u>Emission Factor</u>

NOx	4.41 lb/mmBtu
CO	0.95 lb/mmBtu
PE*	0.25 lb/mmBtu
SO2	0.29 lb/mmBtu
VOC	0.36 lb/mmBtu

*See Section A.V.1.c.

If required, emissions testing shall be conducted using the following test methods: 40 CFR Part 60, Appendix A, Methods 1-4 and Method 5 for PE, Method 7E for NOx, Method 10 for CO, Method 6C for SO2 and Methods 18, 25, or 25A for VOC. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA Central District Office.

b. Emission Limitations:
3.85 tons of NOx per rolling, 12-month period
0.83 tons of CO per rolling, 12-month period
0.25 ton of SO_2 per rolling, 12-month period
0.22 ton of PE per rolling, 12-month period
0.31 ton of VOC per rolling, 12-month period

Applicable Compliance Method:
The annual emission limitations were established by multiplying the maximum hourly emission rate determined in Section A.V.1.a above by the maximum allowable hours of operation of 500 hours per rolling, 12-month period.

c. Emission Limitation:
Particulate emissions from the engine exhaust shall not exceed 0.25 lb/mmBtu actual heat input

Applicable Compliance Method:
Please note that the Ohio EPA has requested that the 0.25 lb/mmBtu of actual heat input limitation be modified to 0.310 lb PE/mmBtu of actual heat input but the new limitation will not become effective until it is approved by U.S. EPA as a revision to the Ohio SIP for particulate matter.

If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

d. Emission Limitation:
Visible emissions shall not exceed 20% opacity as a six-minute average.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A. Method 9 and the procedures are specified in OAC rule 3745-17-03(B)(1).

VI. Miscellaneous Requirements

None

B. State Only Enforceable Section

I. 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
B419 - 469 HP stationary diesel emergency generator	OAC rule 3745-17-11(B)(5)(b)	PE from the engine's exhaust shall not exceed 0.310 lb/mmBtu actual heat input. See Section A.2.a below.

2. Additional Terms and Conditions

2.a This particulate emission limitation shall be effective and federally enforceable on the date the U.S. EPA approves this particulate emission limitation as a revision to the Ohio SIP for particulate matter.

II. Operational Restrictions

None

III. Monitoring and/or Recordkeeping Requirements

None

IV. Reporting Requirements

None

V. Testing Requirements

1. Compliance with the emission limitation(s) in Section B.I. of these terms and conditions shall be determined in accordance with the following method(s);

Emission Limitation:
PE from the engine's exhaust shall not exceed 0.310 lb/mmBtu actual heat input

Applicable Compliance Method:
Compliance shall be determined based on the emission factor of 0.31 lb/mmBtu specified in the U.S. EPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.3, Table 3.3-1 (10/96) for ""Gasoline and Diesel Industrial Engines."
If required, the permittee shall demonstrate compliance with this emission limitation in accordance with the methods and procedures specified in OAC rule 3745-17-03(B)(10).

VI. Miscellaneous Requirements

1. The emission limitation of OAC rule 3745-17-11(B)(5) became effective with the January 31, 1998, rule revisions. The revision failed to account for these types of engines. For this and other reasons, Ohio will be revising this rule in the near future. The revisions will account for these types of emissions units.

   The January 31, 1998, rule revision is not part of Ohio's approved State Implementation Plan (SIP). For this reason, the rule is only identified within Part III-Section B. of the permit.