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

06/13/05

CERTIFIED MAIL

RE: Draft Title V Chapter 3745-77 permit

03-35-01-0056
AMP-Ohio Gas Turbines - Napoleon
Randy D Meyer
AMP-Ohio
2600 Airport Drive
Columbus, OH 43219

Dear Randy D Meyer:

You are hereby notified that the Ohio Environmental Protection Agency has prepared the enclosed draft of the Title V permit for the facility referenced above. The purpose of this draft is to solicit public comments. A public notice concerning the draft will appear in the Ohio EPA Weekly Review and the major newspaper in the county where the facility is located. Comments and/or a request for a public hearing from the public and any affected parties will be accepted by Northwest District Office within 30 days of the date of publication in the newspaper. You will be notified in writing if a public hearing is scheduled. **In order to facilitate our review of all the comments or concerns you may have with the enclosed draft permit, please provide a hand marked-up copy of the draft permit showing the changes you think are necessary, along with any additional summary comments, by the end of the draft public comment period. The hard marked-up copy and any additional summary comments should be submitted to the Ohio EPA District Office or local air agency identified below and to this office at the following address:**

Ohio EPA, Division of Air Pollution Control
Permit Issuance and Data Management Section
Draft Title V Permit Correspondence
122 South Front Street
Columbus, Ohio 43215

A decision on processing the Title V permit will be made after consideration of written public comments and oral testimony (if a public hearing is conducted). After the comment period, you will be provided with a Preliminary Proposed Title V permit and an opportunity to comment prior to the Proposed Title V permit submittal to USEPA.

If you have any questions concerning this draft Title V permit, please contact Northwest District Office.

Sincerely,

Michael W. Ahern

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

cc: USEPA (electronically submitted)
File, DAPC PMU
Northwest District Office
Indiana
Michigan

State of Ohio Environmental Protection Agency

DRAFT TITLE V PERMIT

Issue Date: 06/13/05	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance

This document constitutes issuance of a Title V permit for Facility ID: 03-35-01-0056 to:

AMP-Ohio Gas Turbines - Napoleon
AMP-Ohio
2600 Airport Drive
Columbus, OH 43219

Emissions Unit ID (Company ID)/Emissions Unit Activity Description

P001 (CT#2 (GE Frame 5 LA)) Combustion Turbine Used to Generate Electricity During Periods of Peak Demand and During Emergencies	P002 (CT#1 (Westinghouse 301G)) Combustion Turbine Used to Generate Electricity During Periods of Peak Demand and During Emergencies

You will be contacted approximately eighteen (18) months prior to the expiration date regarding the renewal of this permit. If you are not contacted, please contact the appropriate Ohio EPA District Office or local air agency listed below. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, provided that a complete renewal application is submitted no earlier than eighteen (18) months and no later than one-hundred eighty (180) days prior to the expiration date.

Described below is the current Ohio EPA District Office or local air agency that is responsible for processing and administering your Title V permit:

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

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Joseph P. Koncelik
Director

PART I - GENERAL TERMS AND CONDITIONS

A. State and Federally Enforceable Section

1. Monitoring and Related Record Keeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.III of Part III of this Title V permit, 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.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

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

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

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted by January 31, April 30, July 31, and October 31 of each year in accordance with General Term and Condition A.1.c.ii below; and each report shall cover the previous calendar quarter.

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

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

Any scheduled maintenance, as referenced in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described above for malfunctions.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

ii. **Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Section A.IV of Part III of this Title V permit or, in some cases, in Part II of this Title V permit, all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**

Written reports of (a) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. OAC rule 3745-77-07(A)(3)(c) is not fully satisfied until the permittee addresses all other deviations of the federally enforceable requirements specified in the permit.

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

See B.6 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

iii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with General Term and Condition A.1.c.ii above shall be submitted in the following manner:**

Written reports that identify all other deviations of the federally enforceable requirements contained in this permit, including the monitoring, record keeping, and reporting requirements, which are not reported in accordance with General Term and Condition A.1.c.ii above shall be

submitted to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months.

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

These semi-annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with General Term and Condition A.1.c.ii above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.
(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii))

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 (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

v. Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

2. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in General Term and Condition A.1.c.i above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Risk Management Plans

If applicable, the permittee shall develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. § 7401 et seq. ("Act"); and, pursuant to 40 C.F.R. 68.215(a), the permittee shall submit either of the following:

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

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

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

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.

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

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

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, in accordance with A.10 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

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

(Authority for term: OAC rule 3745-77-07(A)(7))

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

8. Marketable Permit Programs

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.
(Authority for term: OAC rule 3745-77-07(A)(9))

9. Reasonably Anticipated Operating Scenarios

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these general terms and conditions shall apply to all operating scenarios authorized in this permit.
(Authority for term: OAC rule 3745-77-07(A)(10))

10. Reopening for Cause

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

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

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

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

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

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

11. Federal and State Enforceability

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

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

12. Compliance Requirements

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

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

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

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.

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

i. Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted on or before April 30th of each year during the permit term.
ii. Compliance certifications shall include the following:
(a) An identification of each term or condition of this permit that is the basis of the certification.
(b) The permittee's current compliance status.
(c) Whether compliance was continuous or intermittent.
(d) The method(s) used for determining the compliance status of the source currently and over the required reporting period.
(e) Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.
iii. Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

13. Permit Shield

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

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

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

14. Operational Flexibility

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

air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

15. Emergencies

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

16. Off-Permit Changes

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

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

b. The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA. Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

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

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

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

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

17. Compliance Method Requirements

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

18. Insignificant Activities

Each insignificant activity that has one or more applicable requirements shall comply with those applicable requirements.
(Authority for term: OAC rule 3745-77-07(A)(1))

19. Permit to Install Requirement

Prior to the "installation" or "modification" of any "air contaminant source," as those terms are defined in OAC rule 3745-31-01, a permit to install must be obtained from the Ohio EPA pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-07(A)(1))

20. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.
(Authority for term: OAC rule 3745-77-07(A)(1))

21. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification by the responsible official of the date on which the emissions unit was permanently shut down. Authorization to operate the affected part or activity of the stationary source shall cease upon the date certified by the responsible official that the emissions unit was permanently shut down.

If an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any monitoring, record keeping, reporting, or testing requirements, applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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

B. *State Only Enforceable Section*

1. 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 (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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.)

2. 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.

3. 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.

4. 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).

5. 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.

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

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

a. where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in General Term and Condition A.1.c.ii;

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

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

Part II - Specific Facility Terms and Conditions

A. State and Federally Enforceable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions unit located at this facility is exempt from permit requirements because it is not subject to any applicable requirements or because it meets the "de minimis" criteria established in OAC rule 3745-15-05:

Z001 - Aqueous Ammonia Storage Tank.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: CT#2 (GE Frame 5 LA) (P001)

Activity Description: Combustion Turbine Used to Generate Electricity During Periods of Peak Demand and During Emergencies

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
GE Frame 5LA natural gas-fired combustion turbine (with a nominal capacity of 16.5 MW), equipped with a selective catalytic reduction (SCR) system	OAC rule 3745-31-05(A)(3) (PTI #03-13389, issued 5/15/01)	Nitrogen oxides (NOx) emissions shall not exceed 14 ppmvd at 15% oxygen. 13.12 lbs NOx/hr 0.0140 lb particulate emissions (PE)/mmBtu of actual heat input 3.56 lbs PE/hr & 4.0 tons PE/yr 0.0057 lb sulfur dioxide (SO2)/mmBtu heat input 1.45 lbs SO2/hr & 1.6 tons SO2/yr 0.112 lb carbon monoxide (CO)/mmBtu of actual heat input 28.47 lbs CO/hr 2.29 lbs volatile organic compounds (VOC)/hr & 2.6 tons VOC/yr 0.18 lb formaldehyde/hr & 0.2 ton formaldehyde/yr startup and shutdown emissions: 2.5 tons NOx/yr and 1.0 ton CO/yr Visible PE from any stack shall not exceed 10 percent opacity, as a six-minute average.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(C) (PTI #03-13389, issued 5/15/01)	14.8 tons NOx per rolling, 12-month period 32.0 tons CO per rolling, 12-month period See A.II.1.
	OAC rule 3745-17-07(A)	The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC rule 3745-17-11(B)(4)	See A.I.2.a.
	OAC rule 3745-18-06(F)	See A.I.2.a.
	40 CFR, Part 60, Subpart GG	See A.I.2.b.
	OAC rule 3745-21-08(B)	See A.I.2.c.
	OAC rule 3745-23-06(B)	See A.I.2.c.

2. Additional Terms and Conditions

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

2.c The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-13389.

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 State Implementation Plan (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 Emission limitations established in this permit do not include emissions from startups/shutdowns unless specifically addressed.

2.e The 13.12 lbs NOx/hr, 3.56 lbs PE/hr, 1.45 lbs SO2/hr, 28.47 lbs CO/hr, 2.29 lbs VOC/hr and 0.18 lb formaldehyde/hr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping or reporting requirements to ensure compliance with these emission limitations.

II. Operational Restrictions

1. The maximum annual number of hours of operation for this emissions unit shall not exceed 2,250 hours* per rolling, 12-month period, based upon a summation of the monthly numbers of hours of operation.

* This annual restriction includes startup and shutdown periods as they are described in section A.II.3. The maximum annual hours for startups and shutdowns shall not exceed 125 hours.

[OAC rule 3745-77-07(A)(1) and PTI #03-13389]

2. The permittee shall burn only natural gas in this emissions unit. The maximum sulfur content of the natural gas shall not exceed 0.0068 percent, by weight.

[OAC rule 3745-77-07(A)(1) and PTI #03-13389]

3. As specified in the permittee's PTI application, the maximum heat input rating for this emissions unit is 254.2 mmBtu/hr. This value corresponds to a maximum natural gas flow rate of 254,216 cu. ft/hr with a heat content of 1000 Btu/cu. ft. The permittee shall operate this emissions unit within the parameters specified above, except for startup and shutdown periods. Startup periods shall be defined as the time necessary to bring the SCR unit to it's minimum operating temperature (as recommended by the vendor), but under no circumstances shall it exceed 60 minutes in duration. Shutdown periods shall not exceed 30 minutes in duration.

[OAC rule 3745-77-07(A)(1) and PTI #03-13389]

4. With the exception of startup and shutdown periods, this emissions unit shall be operated at 100% load. The permittee may petition the Ohio EPA to operate at a greater load range if it can demonstrate to the agency's satisfaction that the emissions unit will comply with all applicable emission limits in this permit.

[OAC rule 3745-77-07(A)(1) and PTI #03-13389]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

a. the number of hours of operation;

b. the rolling, 12-month number of hours of operation;

c. the NOx and CO emission rates*, in pounds;

d. the rolling, 12-month NOx and CO emissions rates, in tons;

e. the number of hours of operation for startup and shutdown periods;

f. the NOx and CO emission rates** for the startup and shutdown periods, in tons; and

g. the annual, year-to-date NOx and CO emission rates, in tons, associated with the startup and shutdown periods (summation of f for each pollutant).

* determined from the most recent emission testing data and/or continuous emission monitoring data available for each pollutant

** The permittee shall use 38.0 lbs NOx/hr and 13.0 lbs CO/hr as additional emissions associated with the startup and shutdown periods, or as determined by testing data or continuous monitoring data that maybe available for this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

III. Monitoring and/or Record Keeping Requirements (continued)

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

3. The permittee shall determine compliance with the sulfur content standard as follows: ASTM D 1072-80, D 3031-81, D 4084-82, or D 3246-81 shall be used for the sulfur content of gaseous fuels. The permittee shall determine the heat content of the fuels using ASTM method D240. The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Ohio EPA, Central Office. The newest or most recent revisions to the applicable test method shall be used for these analyses. Alternative, equivalent methods may be used if they comply with the requirements specified in 40 CFR, Part 60.13, or upon written approval by the Ohio EPA, Central Office. The frequency of the sampling shall be such that it complies with the requirements specified in 40 CFR, Part 60.334. A custom fuel monitoring schedule may be used if approved by the Ohio EPA, Northwest District Office.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

4. This emissions unit shall have an information management system that shall be capable of monitoring and recording percent load.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

5. The permittee shall operate and maintain equipment to continuously monitor and record NOx emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Parts 60 and Part 75, if applicable.

The permittee shall maintain records of data obtained by the continuous NOx monitoring system including, but not limited to:

a. emissions of NOx, in parts per million, on an instantaneous (one-minute) basis;

b. emissions of NOx, in pounds per hour;

c. results of quarterly cylinder gas audits or linearity checks, if applicable;

d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);

f. hours of operation of the emissions unit, continuous NOx monitoring system, and control equipment;

g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NOx monitoring system;

h. the date, time, hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NOx monitoring system; as well as,

i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

6. The permittee shall operate and maintain equipment to continuously monitor and record the fuel flow rate in order to stoichiometrically calculate emissions of NOx, in pounds per hour. Fuel heat content values for each fuel burned, as applied in the stoichiometric calculations, shall also be recorded. The permittee shall maintain records of data obtained by the fuel flow monitor/meter, including the dates and results of each calibration check and the magnitude of calibration adjustments; periods of downtime and malfunction of the fuel flow monitor/meter; as well as, the reason (if known) and the corrective actions taken (if any) for each such event.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

III. Monitoring and/or Record Keeping Requirements (continued)

7. The permittee shall maintain on-site documentation from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous NOx monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2; the accuracy requirements of Specification 6; and has been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75. The permittee shall document that the fuel flow monitor/meter meets 40 CFR 75 certification requirements prior to the performance specification test, and shall demonstrate how the pound per hour emissions of NOx is being calculated stoichiometrically. The letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

IV. Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

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

a. all exceedances of the rolling, 12-month number of hours of operation restriction of 2250;

b. all exceedances of the rolling, 12-month NOx emission limitation of 14.8 tons; and

c. all exceedances of the rolling, 12-month CO emission limitation of 32.0 tons.

These reports shall be submitted in accordance with General Term and Condition A.1.c of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

3. The permittee shall submit quarterly deviation (excursion) reports that identify any record which shows that the sulfur content of the natural gas exceeded 0.0068 percent, by weight. These reports shall be submitted in accordance with General Term and Condition A.1.c of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

4. The permittee shall submit deviation (excursion) reports that identify all periods of time when this emissions unit was not in compliance with the requirements established in sections A.II.3 and A.II.4 above. These reports shall be submitted in accordance with General Term and Condition A.1.c of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

IV. Reporting Requirements (continued)

5. The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NOx monitoring system:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of NOx emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, 40 CFR Part 76, OAC Chapters 3745-14 and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s). If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect.

b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

i. the facility name and address;

ii. the manufacturer and model number of the continuous NOx and other associated monitors;

iii. the location of the continuous NOx monitor;

iv. the exceedance report as detailed in (a) above;

v. the total NOx emissions for the calendar quarter (tons);

vi. the total operating time (hours) of the emissions unit;

vii. the total operating time of the continuous NOx monitoring system while the emissions unit was in operation

viii. results and date of quarterly cylinder gas audits or linearity checks, if applicable;

ix. results and date of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s);

x. the results of any relative accuracy test audit showing the continuous NOx monitor out-of-control and the compliant results following any corrective actions;

xi. the date, time, and duration of any/each malfunction* of the continuous NOx monitoring system, emissions unit, and/or control equipment;

xii. the date, time, and duration of any downtime* of the continuous NOx monitoring system and/or control equipment while the emissions unit was in operation; and

xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(11) and (12).

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR 75 are not to be used for showing compliance with the short term OAC 3745-31-05(A)(3) rule-based or NSPS-based limitation(s) in this permit.

* each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

IV. Reporting Requirements (continued)

6. The permittee shall submit quarterly reports that document the date, time, and duration of each malfunction and/or period of downtime of the continuous fuel flow monitoring system, while the emissions unit was in operation, and the reason (if known) and the corrective actions taken (if any) for each such event. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

7. The permittee shall collect, record, and maintain measurements, data, records, and reports required per 40 CFR Part 75; and shall submit certification, recertification, notifications, applications, monitoring plans, petitions for alternative monitoring systems, electronic quarterly reports, and any other pertinent record and/or report to the Administrator (U.S. EPA), as required by this Part.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

8. The permittee shall submit annual reports that summarize the following: (a) the actual annual number of hours of operation, (b) the actual annual number of hours for startups and shutdowns, (c) the actual annual NOx emissions (during startups and shutdowns and during normal operation) and (4) the actual annual CO emissions (during startups and shutdowns and during normal operation) for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing* shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit renewal.

b. The emission testing shall be conducted to demonstrate compliance with the NOx (in lbs/hr and in ppmv) and CO (in lbs/mmBtu and lbs/hr) emission limitations.

c. The following test method(s) shall be employed to demonstrate compliance with the above emission limitations: for NOx, Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A; and for CO, Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The testing shall be performed at peak load (as defined by 40 CFR, Part 60.331), unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

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 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, Northwest District Office 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 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.

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.

* In lieu of the test methods and procedures required under 40 CFR, Part 60.335, the permittee shall follow the testing requirements in accordance with this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

2. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined according to the following methods:

2.a Emission Limitations: NOx emissions shall not exceed 14 ppmvd at 15% Oxygen, 13.12 lbs NOx/hr and 14.8 tons NOx per rolling, 12-month period

Applicable Compliance Method: Compliance with the outlet concentration and lbs/hr NOx emission limitations shall be demonstrated based on the results of stack testing conducted in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A and on the monitoring and record keeping requirements established in section A.III of this permit.

Compliance with the annual allowable NOx emission limitation shall based on the monitoring and record keeping requirements established in section A.III.1 of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

2.b Emission Limitations: 0.0140 lb PE/mmBtu heat input, 3.56 lbs PE/hr and 4.0 tons PE/yr

Applicable Compliance Method: The hourly PE limitation was established by multiplying the maximum heat input of 254.2 mmBtu/hr by the vendor-supplied emission factor of 0.0140 lb PE/mmBtu.

As long as compliance with the hourly emission limitation and the restriction on the annual number of hours of operation is maintained, compliance with the annual emission limitation shall be ensured (the annual emission limitation was determined by multiplying the hourly emission limitation by the annual allowable number of hours of operation, and then dividing by 2000 lbs/ton).

If required, the permittee shall demonstrate compliance with the hourly and lbs PE/mmBtu limitations above through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

V. Testing Requirements (continued)

2.c Emission Limitations: 0.0057 lb SO2/mmBtu heat input, 1.45 lbs SO2/hr and 1.6 tons SO2/yr

Applicable Compliance Method: The lb/mmBtu SO2 emission limitation was established based on the maximum natural gas sulfur content of 2 gr/100 cu. ft as follows:

i. multiply the maximum sulfur content (2 gr/100 cu. ft) by the maximum hourly natural gas flow rate (254,216 cu. ft/hr), and then divide by 7000 gr/lb; and

ii. divide the result from section A.V.2.c.i above by the maximum heat input rate (254.2 mmBtu/hr) and multiply by 2.*

The hourly allowable SO2 emission limitation was determined by multiplying the lb/mmBtu emission limitation by the maximum hourly heat input capacity (mmBtu/hr).

As long as compliance with the hourly emission limitation and the restriction on the annual number of hours of operation is maintained, compliance with the annual emission limitation shall be ensured (the annual emission limitation was determined by multiplying the hourly emission limitation by the annual allowable number of hours of operation, and then dividing by 2000 lbs/ton).

If required, the permittee shall demonstrate compliance with the lb/mmBtu and hourly SO2 emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

* S to SO2 conversion factor

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

2.d Emission Limitations: 2.29 lbs VOC/hr and 2.6 tons VOC/yr

Applicable Compliance Method: The hourly allowable VOC emission limitation was established by multiplying the maximum heat input capacity of 254.2 mmBtu/hr by the vendor-supplied emission factor of 0.0090 lb VOC/mmBtu.

As long as compliance with the hourly emission limitation and the restriction on the annual number of hours of operation is maintained, compliance with the annual emission limitation shall be ensured (the annual emission limitation was determined by multiplying the hourly emission limitation by the annual allowable number of hours of operation and then dividing by 2000 lbs/ton).

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

2.e Emission Limitations: 0.1120 lb CO/mmBtu heat input, 28.47 lbs CO/hr and 32.0 tons CO per rolling, 12-month period

Applicable Compliance Method: Compliance with the lb/mmBtu and hourly allowable CO emission limitations shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable CO emission limitation shall be determined based on the the record keeping establishesd in section A.III.1 of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

V. Testing Requirements (continued)

2.f Emission Limitations: Startup and shutdown emissions - 2.5 tons NOx/yr and 1.0 ton CO/yr

Applicable Compliance Method: Compliance with the annual allowable NOx and CO emission limitations shall be determined based on the record keeping requirements establishesd in section A.III.1 of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

2.g Emission Limitations: 0.18 lb/hr formaldehyde and 0.2 ton formaldehyde/yr

Applicable Compliance Method: Compliance with the hourly allowable formaldehyde emission limitation may be demonstrated by multiplying the emission factor of 0.00071 pound of formaldehyde/mmBtu heat input (from AP-42, Table 3.1-3, revised 4/00) by the maximum heat input capacity of 254.2 mmBtu/hr.

As long as compliance with the hourly emission limitation and the restriction on the annual number of hours of operation is maintained, compliance with the annual emission limitation shall be ensured (the annual emission limitation was determined by multiplying the hourly emission limitation by the annual allowable number of hours of operation, and then dividing by 2000 lbs/ton).

If required, the permittee shall demonstrate compliance with the hourly allowable formaldehyde emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 320.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

2.h Emission Limitation: Visible PE from any stack shall not exceed 10 percent opacity as a six-minute average.

Applicable Compliance Method: Compliance with the visible PE limitation shall be determined by Method 9, 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

VI. Miscellaneous Requirements

1. Should this emissions unit be converted from a simple cycle to a combined cycle turbine in the future, a new BAT determination would be required. [OAC rule 3745-77-07(C)(1) and PTI #03-13389]

2. Within 180 days of the effective date of this permit, the permittee shall develop and maintain a written quality assurance/quality control plan for the continuous NOx monitoring system and fuel flow monitor/meter, designed to ensure continuous valid and representative readings of NOx emissions in units of the applicable standard(s). Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous NOx monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous NOx monitoring system in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits pursuant to 40 CFR Part 60, and linearity checks pursuant to 40 CFR Part 75; however, linearity checks completed pursuant to 40 CFR Part 75, Appendix B, may be substituted for the quarterly cylinder gas or relative accuracy audits required per 40 CFR Part 60. [OAC rule 3745-77-07(C)(1) and PTI #03-13389]

3. In accordance with good engineering practices, the SCR unit on emissions unit P001 shall be installed, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall maintain on site a copy of the operation & maintenance manual, as provided by the manufacturer. [OAC rule 3745-77-07(C)(1) and PTI #03-13389]

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
GE Frame 5LA natural gas-fired combustion turbine (with a nominal capacity of 16.5 MW), equipped with a selective catalytic reduction (SCR) system	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

1. The permit to install for this emissions unit was evaluated based on the actual materials and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

Pollutant: Formaldehyde
TLV (ug/m3): 273 (Converted from the STEL)
Maximum Hourly Emission Rate (lbs/hr): 0.52*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.38
MAGLC (ug/m3): 6.49

Pollutant: Sulfuric Acid
TLV (ug/m3): 1000
Maximum Hourly Emission Rate (lbs/hr): 1.43*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3.81
MAGLC (ug/m3): 23.8

Pollutant: Ammonia
TLV (ug/m3): 17000
Maximum Hourly Emission Rate (lbs/hr): 11.2*
Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.7
MAGLC (ug/m3): 404.8

* This was modeled for emissions units P001 & P002 combined.

III. Monitoring and/or Record Keeping Requirements (continued)

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: CT#1 (Westinghouse 301G) (P002)

Activity Description: Combustion Turbine Used to Generate Electricity During Periods of Peak Demand and During Emergencies

A. State and Federally Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Mitsubishi 301 natural gas-fired combustion turbine with nominal generating capacity of 33.0 MW, equipped with a selective catalytic reduction (SCR) system	OAC rule 3745-31-05(A)(3) (PTI #03-13389, issued 5/15/05)	Nitrogen oxides (NOx) emissions shall not exceed 14 ppmvd at 15% oxygen. 24.37 lbs NOx/hr 0.0140 lb particulate emissions (PE)/mmBtu of actual heat input 6.61 lbs PE/hr & 7.4 tons PE/yr 0.0057 lb sulfur dioxide (SO2)/mmBtu of actual heat input 2.69 lbs SO2/hr & 3.0 tons SO2/yr 0.1120 lb carbon monoxide (CO)/mmBtu of actual heat input 52.88 lbs carbon monoxide (CO)/hr 4.25 lbs volatile organic compounds (VOC)/hr & 4.8 tons VOC/yr Startup and shutdown emissions: 12.6 tons NOx/yr and 4.3 tons CO/yr Visible PE from any stack shall not exceed 10 percent opacity, as a six-minute average. 0.34 lb formaldehyde/hr & 0.3 ton formaldehyde/yr

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-31-05(C) (PTI #03-13389, issued 5/15/05)	27.4 tons NOx per rolling, 12-month period 59.5 tons CO per rolling, 12-month period See A.II.1.
	OAC rule 3745-17-07(A)	The visible PE limitation specified by this rule is less stringent than the visible PE limitation established pursuant to OAC rule 3745-31-05(A)(3).
	OAC Rule 3745-17-11(B)(4)	See A.I.2.a.
	OAC rule 3745-18-06(F)	See A.I.2.a.
	40 CFR Part 60, Subpart GG	See A.I.2.b.
	40 CFR, Parts 72 and 75	See A.I.2.c.
	OAC rule 3745-103	See A.I.2.c.
	OAC rule 3745-21-08(B)	See A.I.2.d.
	OAC rule 3745-23-06(B)	See A.I.2.d.

2. Additional Terms and Conditions

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

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

2.d The permittee has satisfied the "latest available control techniques and operating practices" required pursuant to OAC rule 3745-23-06 (B) and the "best available control techniques and operating practices" required pursuant to OAC rule 3745-21-08(B) by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05 (A)(3) in Permit to Install 03-13389.

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 State Implementation Plan (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.e The 24.37 lbs NOx/hr, 6.61 lbs PE/hr, 2.69 lbs SO2/hr, 52.88 lbs CO/hr, 4.28 lbs VOC/hr and 0.34 lb formaldehyde/hr emission limitations were established for PTI purposes to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop any additional monitoring, record keeping or reporting requirements to ensure compliance with these emission limitations.

2.f Emission limitations established in this permit do not include emissions from startups/shutdowns, unless specifically addressed.

II. Operational Restrictions

1. The maximum annual number of hours of operation for this emissions unit shall not exceed 2,250 hours* per rolling, 12-month period, based upon a summation of the monthly number of hours of operation.

* This annual restriction includes start-up and shutdown periods as they are described in section A.II.3. The maximum annual hours for startups and shutdowns shall not exceed 375 hours.

[OAC rule 3745-77-07(A)(1) and PTI #03-13389]

2. The permittee shall burn only natural gas in this emissions unit. The maximum sulfur content of the natural gas shall not exceed 0.0068 percent, by weight.

[OAC rule 3745-77-07(A)(1) and PTI #03-13389]

3. As specified in the permittee's PTI application, the maximum heat input rating for this emissions unit is 472.2 mmBtu/hr. This value corresponds to a maximum natural gas flow rate of 472,164 cu. ft./hr with a heat content of 1000 Btu/cu. ft. The permittee shall operate this emissions unit within the parameters specified above, except for startup and shutdown periods. Startup periods shall be defined as the time necessary to bring the SCR unit to it's minimum operating temperature (as recommended by the vendor), but under no circumstances shall it exceed 60 minutes in duration. Shutdown periods shall not exceed 30 minutes in duration.

[OAC rule 3745-77-07(A)(1) and PTI #03-13389]

4. With the exception of startup and shutdown periods, this emissions unit shall be operated at 100% load. The permittee may petition the Ohio EPA to operate at a greater load range if it can demonstrate to the agency's satisfaction that the emissions unit will comply with all applicable emission limits in this permit.

[OAC rule 3745-77-07(A)(1) and PTI #03-13389]

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:

a. the number of hours of operation;

b. the rolling, 12-month number of hours of operation;

c. the NOx and CO emission rates*, in pounds;

d. the rolling, 12-month NOx and CO emissions rates, in tons;

e. the number of hours of operation for the startup and shutdown periods;

f. the NOx and CO emission rates** for the startup and shutdown periods, in tons; and

g. the annual, year-to-date NOx and CO emission rates, in tons, associated with the startup and shutdown periods (summation of f for each pollutant).

* determined from the most recent emission testing data and/or continuous emission monitoring data available for each pollutant.

** The permittee shall use 67.0 lbs NOx/hr and 23.0 lbs CO/hr as additional emissions associated with the startup and shutdown periods, or as determined by testing data or continuous monitoring data that maybe available for this emissions unit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

III. Monitoring and/or Record Keeping Requirements (continued)

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

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

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

4. This emissions unit shall have an information management system that shall be capable of monitoring and recording percent load.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

5. The permittee shall operate and maintain equipment to continuously monitor and record NOx emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Parts 60 and Part 75, if applicable.

The permittee shall maintain records of data obtained by the continuous NOx monitoring system including, but not limited to:

a. emissions of NOx in parts per million on an instantaneous (one-minute) basis;

b. emissions of NOx in pounds per hour;

c. results of quarterly cylinder gas audits or linearity checks, if applicable;

d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;

e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);

f. hours of operation of the emissions unit, continuous NOx monitoring system, and control equipment;

g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NOx monitoring system;

h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous NOx monitoring system; as well as,

i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

III. Monitoring and/or Record Keeping Requirements (continued)

6. The permittee shall operate and maintain equipment to continuously monitor and record the fuel flow rate in order to stoichiometrically calculate emissions of NOx, in pounds per hour. Fuel heat content values for each fuel burned, as applied in the stoichiometric calculations, shall also be recorded. The permittee shall maintain records of data obtained by the fuel flow monitor/meter, including the dates and results of each calibration check and the magnitude of calibration adjustments; periods of downtime and malfunction of the fuel flow monitor/meter; as well as, the reason (if known) and the corrective actions taken (if any) for each such event.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

7. The permittee shall maintain on-site documentation from the U.S. EPA or the Ohio EPA's Central Office documenting that the continuous NOx monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2; the accuracy requirements of Specification 6; and has been certified by U.S. EPA or recommended for certification by Ohio EPA to U.S. EPA under 40 CFR Part 75. The permittee shall document that the fuel flow monitor/meter meets 40 CFR 75 certification requirements prior to the performance specification test, and shall demonstrate how the pound per hour emissions of NOx is being calculated stoichiometrically. The letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

IV. Reporting Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

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

a. all exceedances of the rolling, 12-month number of hours of operation restriction of 2250;

b. all exceedances of the rolling, 12-month NOx emission limitation of 27.4 tons; and

c. all exceedances of the rolling, 12-month CO emission limitation of 59.5 tons.

These reports shall be submitted in accordance with General Term and Condition A.1.c of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

3. The permittee shall submit quarterly deviation (excursion) reports that identify any record which shows that the sulfur content of the natural gas exceeded 0.0068 percent, by weight. These reports shall be submitted in accordance with General Term and Condition A.1.c of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

4. The permittee shall submit deviation (excursion) reports that identify all periods of time when this emissions unit was not in compliance with the requirements established in sections A.II.3 and A.II.4 above. These reports shall be submitted in accordance with General Term and Condition A.1.c of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

IV. Reporting Requirements (continued)

5. The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NOx monitoring system:

a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of NOx emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, 40 CFR Part 76, OAC Chapters 3745-14 and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s). If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect.

b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:

i. the facility name and address;

ii. the manufacturer and model number of the continuous NOx and other associated monitors;

iii. the location of the continuous NOx monitor;

iv. the exceedance report as detailed in (a) above;

v. the total NOx emissions for the calendar quarter (tons);

vi. the total operating time (hours) of the emissions unit;

vii. the total operating time of the continuous NOx monitoring system while the emissions unit was in operation

viii. results and date of quarterly cylinder gas audits or linearity checks, if applicable;

ix. results and date of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s);

x. the results of any relative accuracy test audit showing the continuous NOx monitor out-of-control and the compliant results following any corrective actions;

xi. the date, time, and duration of any/each malfunction* of the continuous NOx monitoring system, emissions unit, and/or control equipment;

xii. the date, time, and duration of any downtime* of the continuous NOx monitoring system and/or control equipment while the emissions unit was in operation; and

xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(11) and (12).

Each report shall address the operations conducted and data obtained during the previous calendar quarter. Data substitution procedures from 40 CFR 75 are not to be used for showing compliance with the short term OAC 3745-31-05(A)(3) rule-based or NSPS-based limitation(s) in this permit.

* each downtime and malfunction event shall be reported regardless if there is an exceedance of any applicable limit

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

IV. Reporting Requirements (continued)

6. The permittee shall submit quarterly reports that document the date, time, and duration of each malfunction and/or period of downtime of the continuous fuel flow monitoring system, while the emissions unit was in operation, and the reason (if known) and the corrective actions taken (if any) for each such event. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

7. The permittee shall collect, record, and maintain measurements, data, records, and reports required per 40 CFR Part 75; and shall submit certification, recertification, notifications, applications, monitoring plans, petitions for alternative monitoring systems, electronic quarterly reports, and any other pertinent record and/or report to the Administrator (U.S. EPA), as required by this Part.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

8. The permittee shall submit annual reports that summarize the following: (a) the actual annual number of hours of operation, (b) the actual annual number of hours for startups and shutdowns, (c) the actual annual NOx emissions (during startups and shutdowns and during normal operation) and (4) the actual annual CO emissions (during startups and shutdowns and during normal operation) for this emissions unit. These reports shall be submitted by January 31 of each year and shall cover the previous calendar year.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

V. Testing Requirements

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

a. The emission testing* shall be conducted within 6 months after issuance of this permit and within 6 months prior to permit renewal.

b. The emission testing shall be conducted to demonstrate compliance with the NOx (in lbs/hr and in ppmv) and CO (in lbs/mmBtu and lbs/hr) emission limitations.

c. The following test method(s) shall be employed to demonstrate compliance with the above emission limitations: for NOx, Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A; and for CO, Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

d. The testing shall be performed at peak load (as defined by 40 CFR, Part 60.331), unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

V. Testing Requirements (continued)

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 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, Northwest District Office 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 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.

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.

* In lieu of the test methods and procedures required under 40 CFR, Part 60.335, the permittee shall follow the testing requirements in accordance with this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

2. Compliance with the emission limitations in Section A.I of the terms and conditions of this permit shall be determined according to the following methods:

2.a Emission Limitations: NOx emissions shall not exceed 14 ppmvd at 15% Oxygen, 24.37 lbs NOx/hr and 27.4 tons NOx per, rolling 12-month period

Applicable Compliance Method: Compliance with the outlet concentration and lbs/hr NOx emission limitations shall be demonstrated based on the results of stack testing conducted in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A and on the monitoring and record keeping requirements established in section A.III of this permit.

Compliance with the annual allowable NOx emission limitation shall based on the monitoring and record keeping requirements established in section A.III.1 of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

2.b Emission Limitation: 0.0140 lb PE/mmBtu heat input, 6.61 lbs PE/hr and 7.4 tons PE/yr

Applicable Compliance Method: The hourly PE limitation was established by multiplying the maximum heat input of 472.2 mmBtu/hr by the vendor-supplied emission factor of 0.0140 lb PE/mmBtu.

As long as compliance with the hourly emission limitation and the restriction on the annual number of hours of operation is maintained, compliance with the annual emission limitation shall be ensured (the annual emission limitation was determined by multiplying the hourly emission limitation by the annual allowable number of hours of operation, and then dividing by 2000 lbs/ton).

If required, the permittee shall demonstrate compliance with the hourly and lbs PE/mmBtu limitations above through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1-5.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

V. Testing Requirements (continued)

2.c Emission Limitation: 0.0057 lb SO2/mmBtu heat input, 2.69 lbs SO2/hr and 3.0 tons SO2/yr

Applicable Compliance Method: The lb/mmBtu SO2 emission limitation was established based on the maximum natural gas sulfur content of 2 gr/100 cu. ft. as follows:

i. multiply the maximum sulfur content (2 gr/100 cu. ft.) by the maximum hourly natural gas flow rate (472,164 cu. ft./hr), and then divide by 7000 gr/lb; and

ii. divide the result from section A.V.2.c.i above by the maximum heat input rate (472.2 mmBtu/hr) and multiply by 2.*

The hourly allowable SO2 emission limitation was determined by multiplying the lb/mmBtu emission limitation by the maximum hourly heat input capacity (mmBtu/hr).

As long as compliance with the hourly emission limitation and the restriction on the annual number of hours of operation is maintained, compliance with the annual emission limitation shall be ensured (the annual emission limitation was determined by multiplying the hourly emission limitation by the annual allowable number of hours of operation and then dividing by 2000 lbs/ton).

If required, the permittee shall demonstrate compliance with the lb/mmBtu and hourly SO2 emission limitations through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6.

*S to SO2 conversion factor

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

2.d Emission Limitation: 4.25 lbs VOC/hr and 4.8 tons VOC/yr

Applicable Compliance Method: The hourly allowable VOC emission limitation was established by multiplying the maximum heat input of 472.2 mmBtu/hr by the vendor-supplied emission factor of 0.0090 lb VOC/mmBtu.

As long as compliance with the hourly emission limitation and the restriction on the annual number of hours of operation is maintained, compliance with the annual emission limitation shall be ensured (the annual emission limitation was determined by multiplying the hourly emission limitation by the annual allowable number of hours of operation, and then dividing by 2000 lbs/ton).

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

2.e Emission Limitation: 0.1120 lb CO/mmBtu heat input, 52.88 lbs CO/hr and 59.5 tons CO per rolling, 12 month period

Applicable Compliance Method: Compliance with the lb/mmBtu and hourly allowable CO emission limitations shall be demonstrated based on the results of emission testing conducted in accordance with Methods 1-4 and 10 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable CO emission limitation shall be determined based on the the record keeping requirements establishesd in section A.III.1 of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

V. Testing Requirements (continued)

2.f Emission Limitation: Startup and shutdown emissions: 12.6 tons NOx/yr and 4.3 tons CO/yr

Applicable Compliance Method: Compliance with the annual allowable NOx and CO emission limitations shall be determined based on the record keeping requirements establishesd in section A.III.1 of this permit.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

2.g Emission Limitation: 0.34 lb/hr formaldehyde and 0.3 ton formaldehyde/yr

Applicable Compliance Method: Compliance with the hourly allowable formaldehyde emission limitation may be demonstrated by multiplying the emission factor of 0.00071 pound of formaldehyde/mmBtu heat input (from AP-42, Table 3.1-3, revised 4/00) by the maximum heat input capacity of 472.2 mmBtu/hr.

As long as compliance with the hourly emission limitation and the restriction on the annual number of hours of operation is maintained, compliance with the annual emission limitation shall be ensured (the annual emission limitation was determined by multiplying the hourly emission limitation by the annual allowable number of hours of operation, and then dividing by 2000 lbs/ton).

If required, the permittee shall demonstrate compliance with the hourly allowable formaldehyde emission limitation through emission tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 4 and 320.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

2.h Emission Limitation: Visible PE from any stack shall not exceed 10 percent opacity, as a six-minute average.

Applicable Compliance Method: Compliance with the visible PE limitation shall be determined by Method 9, 40 CFR, Part 60, Appendix A.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

VI. Miscellaneous Requirements

1. Should this emissions unit be converted from a simple cycle to a combined cycle turbine in the future, a new BAT determination shall be required.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

2. Within 180 days of the effective date of this permit, the permittee shall develop and maintain a written quality assurance/quality control plan for the continuous NOx monitoring system and fuel flow monitor/meter, designed to ensure continuous valid and representative readings of NOx emissions in units of the applicable standard(s). Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous NOx monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous NOx monitoring system in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits pursuant to 40 CFR Part 60, and linearity checks pursuant to 40 CFR Part 75; however, linearity checks completed pursuant to 40 CFR Part 75, Appendix B, may be substituted for the quarterly cylinder gas or relative accuracy audits required per 40 CFR Part 60.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

VI. Miscellaneous Requirements (continued)

3. In accordance with good engineering practices, the SCR unit serving emissions unit P002 shall be installed, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall maintain on site a copy of the operation & maintenance manual, as provided by the manufacturer.

[OAC rule 3745-77-07(C)(1) and PTI #03-13389]

B. State Enforceable Section

I. Applicable Emissions Limitations and/or Control Requirements

1. The specific operation(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 employed. Additional applicable emissions limitations and/or control measures (if any) may be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
Mitsubishi 301 natural gas-fired combustion turbine with nominal generating capacity of 33.0 MW, equipped with a selective catalytic reduction (SCR) system	none	none

2. Additional Terms and Conditions

None

II. Operational Restrictions

None

III. Monitoring and/or Record Keeping Requirements

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

[OAC rule 3745-77-07(C)(1) and PTI #03-13377]

2. Physical changes to or changes in the method of operation of the emissions unit after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be still satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

III. Monitoring and/or Record Keeping Requirements (continued)

3. If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.
The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy:"

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

IV. Reporting Requirements

None

V. Testing Requirements

None

VI. Miscellaneous Requirements

None

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THIS IS THE LAST PAGE OF THE PERMIT

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Statement of Basis For Title V Permit

Part I - General	
Company Name	AMP-Ohio Gas Turbines - Napoleon
Premise Number	0335010056
What makes this facility a Title V facility?	NOx and CO
Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01 (U)?	YES
Were there any "common control" issues associated with this facility? If yes, provide a summary of those issues and explain how the DAPC decided to resolve them.	NO
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a minor permit modification per OAC rule 3745-77-08(C)(1)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	N/A
Please identify the affected unit(s)and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	N/A
Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a renewal per OAC rule 3745-77-08(E)	N/A

Part II (State and Federally Enforceable Requirements)			
Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
N/A			

C **Instructions for Part II:**
Each paragraph in Part II must be identified and the remainder of the table completed. If the SIP (not including 31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. Whether the basis for the term and condition is the "SIP" or "Other," an explanation of each term and condition in Part II must be provided in the "Comments" section.

Part III (Requirements Within the State and Federally Enforceable Section)

Any unusual requirements or aspects of the terms and conditions in Part III that are not self-explanatory should be explained in the appropriate comment field or in a paragraph following the table for Part III.

EU(s)	Limitation	Basis		ND	OR	M	St	ENF	R	St	Rp	St	ET	Misc	Comments
		SIP (3745-)	Other												
P001, P002	NOx emissions shall not exceed 14 ppmvd at 15% Oxygen	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. NOx CEMs will be used to ensure ongoing compliance. CAM is not currently applicable.

P001, P002	0.0140 lb PE/mmBtu heat input	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. CEMs are not economically justified. CAM is not currently applicable. ET-This limitation is based on the vendor's specifications and represents the worst case scenario emissions for this unit, therefore, no testing is required.
P001, P002	0.0057 lb SO_2/mmBtu heat input	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas and maximum sulfur content of natural gas not to exceed 0.068%, by weight. M and R includes type of fuel and fuel usage. CEMs are not economically justified. CAM is not currently applicable. ET-This limitation is based on the maximum sulfur content of natural gas allowed for this emission unit and represents the worst case scenario emissions, therefore, no testing is required.
P001, P002	0.1120 lbs CO/mmBtu heat input	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable.
P001, P002	Visible PE from any stack shall not exceed 10% opacity as a six-minute average	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. COMs are not economically justified. CAM is not currently applicable. ET-The M, R & Rp requirements are sufficient to demonstrate compliance without requiring formal Method 9 readings being conducted.
P001	13.12 lbs NOx/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. NOx CEMs will be used to ensure ongoing compliance. CAM is not currently applicable.
P001	3.56 lbs PE/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. Monitoring includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET- The limitation is based on the unit's potential to emit, therefore, no testing is required.

P001	4.0 tons PE/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P001	1.45 lbs SO_2/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas and maximum sulfur content of natural gas not to exceed 0.068%, by weight. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-The limitation is based on the unit's potential to emit, therefore, no testing is required.
P001	1.6 tons SO_2/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas and maximum sulfur content of natural gas not to exceed 0.068%, by weight. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P001	28.47 lbs CO/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	Y	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable.
P001	2.29 lbs VOC/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. ACEM is not economically justified. CAM is not currently applicable. ET-ET-The limitation is based on the unit's potential to emit, therefore, no testing is required.
P001	2.6 tons VOC/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.

P001	0.18 lb formaldehyde/hr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on the maximum heat input of 254.2 mmBtu/hr and the emission factor of 0.00071 lb/mmBtu heat input (AP-42, Section 3.1) are sufficient to show compliance.
P001	0.2 tons formaldehyde/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is not economically justified. CAM is not currently applicable. ET-Calculations based on maximum hourly potential to emit and actual annual hours of operation are sufficient to show compliance.
P001	Startup and Shutdown Emissions: 2.5 tons NOx/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A NOx CEM will be used to ensure that the emission unit does not exceed the presumed hourly NOx emission rate, which is used to calculate the tons/yr limit. CAM is not currently applicable. ET-Calculations based on the maximum hourly rate of 38.0 lbs NOx/hr for startup and shutdown periods and the actual annual hours of startup and shutdowns are sufficient to show compliance.
P001	Startup and Shutdown Emissions: 1.0 tons CO/yr	N	31-05(A)(3)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas. M and R includes type of fuel and fuel usage. A CEM is are not economically justified. CAM is not currently applicable. ET-Calculations based on the maximum hourly rate of 13.0 lbs CO/hr for startup and shutdown periods and the actual annual hours of startup and shutdowns are sufficient to show compliance.
P001	14.8 tons NOx per rolling 12-month period	N	31-05(D)	N	Y	Y	N	N	Y	N	Y	N	N	N	OR- Combust only natural gas and annual operational restriction of 2250 hours based upon a rolling, 12-month period. M and R includes type of fuel and fuel usage. CAM is not currently applicable. ET-Calculations based on actual CEM data or the most recent emission test and annual operational restriction of 2250 hours based upon a rolling 12-month period are sufficient to show compliance.

EU = emissions unit ID

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

- **Instructions for Part III:**

  - All non-insignificant EUs must be included in this table. For each EU, or group of similar EUs, each emission limitation and control requirement specified in section A.I.1 and A.I.2 of the permit must be identified and the remainder of the table completed.

  - If the SIP (not including OAC rule 3745-31-05) is the basis for the term and condition, identify the specific rule. If the SIP is not the basis for the term and condition, place an "N" in the column under "SIP." If the basis for the term and condition is something other than the SIP, including OAC rule 3745-31-05, NSPS or MACT, a "Y" should be noted in the "Other" column, and if not, an "N" should be noted. If the basis for the term and condition is "Other," an explanation of the basis must be provided in the "Comments" section. If OAC rule 3745-31-05 is cited in the "Other" column, please indicate in the "Comments" section whether or not <u>all</u> of the requirements have been transferred from the permit to install.

- To complete the remainder of the table after "Basis," except for the "Comments" section, simply specify a "Y" for yes or an "N" for no. For the "M," "R," "Rp," and "ET" columns, if "N" is specified, there should be a brief explanation in the "Comments" section as to why there are no requirements. If a brief explanation is provided in the "Comments" section, please do not simply indicate that monitoring or testing requirements are not necessary. An explanation of why a requirement is not necessary should be specified.

  When periodic monitoring requirements are established to satisfy the provisions of OAC rule 3745-77-07(A)(3)(a)(ii), the basis for the requirements must be explained. Whenever Engineering Guides have been used to establish the periodic monitoring requirements, the applicable Engineering Guide may be referenced in the "Comments" section. An example that should be clarified would be the situation where it has been determined that control equipment parametric monitoring will be used to evaluate ongoing compliance in lieu of performing frequent emission tests. In this situation, Engineering Guide #65 would be referenced along with the fact that the parametric monitoring range (or minimum value) corresponded to the range (or minimum value) documented during the most recent emission tests that demonstrated that the emissions unit was in compliance. If streamlining language is included in the "Monitoring," "Record Keeping," or "Reporting" requirements sections of the permit, explain which requirements are being streamlined (mark appropriate column above) and provide a brief explanation of why the streamlined term is equal to or more stringent than the "Monitoring," "Record Keeping," or "Reporting" requirements specified in the permit to install. If Engineering Guide #16 was used as the basis for establishing an emission test frequency, a simple note referencing the Engineering Guide in the "Comments" section would be sufficient.

  Also, if a "Y" is noted under "OR," "Misc," "St," "ND," or "ENF" an explanation of the requirements must be provided in the "Comments" section. In addition to a general explanation of the "OR," "Misc," "St," "ND," and/or "ENF" the following must be provided:

  1. For an operational restriction, clarify if appropriate monitoring, record keeping, and reporting requirements have been specified for the operational restriction and indicate whether or not CAM is currently applicable.
  2. If a control plan and schedule is included in the "Miscellaneous Requirements" section of the permit, provide an explanation in the "Comments" section of the violation, basis for the violation, and the company's proposed control plan and schedule.

3. If the “ND” column above is marked, please identify the particular rule(s) that is (are) not applicable to the specified emissions unit.
2. If the “ENF” column above is marked, please provide a brief explanation of the noncompliance issue(s) which prompted the use of the specified monitoring requirement.

An explanation is not required if an “N” is noted in the “OR,” “Misc,” “St,” “ND,” or “ENF” columns.

- **Additional information for modifications** - Several types of modifications, as defined by rule, may be processed concurrently. Please provide enough of a description for someone wishing to review the changes to the permit language to be able to identify where the change is made in the permit document. This brief description should be identified in the appropriate row in the first table of this form by replacing the “N/A” in the applicable row(s). Please also indicate if the modification is being initiated by an appeal by including the ERAC case number in the “Comments” area. Please update the term-specific text in the SOB as warranted (full insertion or replacement is acceptable; bold italic and strike out is not needed). Note all modification/reopening rows should remain “N/A” when developing the SOB during the initial permit development. Note: APA’s and Off-permit changes do not need to be noted in the SOB.