



State of Ohio Environmental Protection Agency

Street Address:

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

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

12/18/02

**CERTIFIED MAIL**

**RE: Preliminary Proposed Title V  
Chapter 3745-77 permit**

03-87-02-0374  
OMEGA JV2 Bowling Green Peaking Station  
Randy Meyer  
AMP-Ohio  
2600 Airport Drive  
Columbus, OH 43219

Dear Randy Meyer:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 06/26/02. The comment period for the Draft permit has ended. We are now ready to submit this permit to USEPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. **Please submit, in writing, any comments you may have within fourteen (14) days from your receipt of this letter to:**

Ohio Environmental Protection Agency  
Jim Orlemann, Manager, Engineering Section  
Division of Air Pollution Control  
P.O.Box 1049  
Columbus, OH 43216-1049

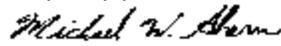
and

Northwest District Office  
(419) 352-8461

Also, if you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments.

If comments are not submitted within fourteen (14) days of your receipt of this letter, we will forward the proposed permit to USEPA for approval. All comments received will be carefully considered before proceeding to the proposed permit.

Very truly yours,

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

cc: Northwest District Office  
File, DAPC PMU



State of Ohio Environmental Protection Agency

**PRELIMINARY PROPOSED TITLE V PERMIT**

Issue Date: 12/18/02	Effective Date: To be entered upon final issuance	Expiration Date: To be entered upon final issuance
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This document constitutes issuance of a Title V permit for Facility ID: 03-87-02-0374 to:  
**OMEGA JV2 Bowling Green Peaking Station**  
 347 North Dunbridge Road  
 Bowling Green, OH 43402

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

P001 (Combustion Turbine ) Natural Gas Fired Combustion Turbine Used to	produce Electricity During peak Demand Periods
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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 3745-77-04(A) 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  
 (419) 352-8461

**OHIO ENVIRONMENTAL PROTECTION AGENCY**

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Christopher Jones  
 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, 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. 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))*
  - ii. **All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) with respect to emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:**
    - (a) Written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations ; (ii) the probable cause of such deviations; and (iii) any corrective actions or preventive measures taken, shall be promptly made to the appropriate Ohio EPA District Office or local air agency. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, i.e., in Part III of this Title V permit, the written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters. 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. These written reports shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the submission of monitoring reports every six

months and the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations. See B.6 below if no deviations occurred during the quarter.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i), (ii) and (iii))*

- (b) 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 deviation reporting requirements for this Title V permit, written reports that identify each malfunction that occurred during each calendar quarter shall be submitted, at a minimum, quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year, and shall cover the previous calendar quarters.

In identifying each deviation caused by a malfunction, the permittee shall specify the applicable requirement 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. Also, if a deviation caused by a malfunction is identified in a written report submitted pursuant to paragraph (a) above, a separate report is not required for that malfunction pursuant to this paragraph. Nevertheless, all malfunctions, including those reported only verbally in accordance with OAC rule 3745-15-06, must be reported in writing, at a minimum, on a quarterly basis.

Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation, operational restriction, and control device operating parameter limitation shall be reported in the same manner as described above for malfunctions. These written reports for malfunctions (and scheduled maintenance projects, if appropriate) shall satisfy the requirements (in part) of OAC rule 3745-77-07(A)(3)(c)(iii) pertaining to the prompt reporting of all deviations.

*(Authority for term: OAC rules 3745-77-07(A)(3)(c)(iii))*

iii. **For monitoring, record keeping, and reporting requirements:**

Written reports that identify any deviations from the federally enforceable monitoring, record keeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year, for the previous six calendar months. 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. These semi-annual written reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c)(i) and (ii) pertaining to the reporting of any deviations related to the monitoring, record keeping, and reporting requirements. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no deviations occurred during that period.

*(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))

**2. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions unit(s) 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 OAC rule 3745-15-06, 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).  
(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iii))

**3. Risk Management Plans**

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.  
(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, except that no such notice shall be required for changes that qualify as insignificant emission levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c. The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d. The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e. The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

(I) of rule 3745-77-07 of the Administrative Code shall affect any applicable obligation under Chapter 3745-31 of the Administrative Code.

(For purposes of clarification, the permittee can refer to Engineering Guide #63 that is available in the STARSHIP software package.)

*(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))*

**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 Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)**

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

## **Part II - Specific Facility Terms and Conditions**

### **A. State and Federally Enforcable Section**

**None**

### **B. State Only Enforceable Section**

**None**

### Part III - Terms and Conditions for Emissions Units

**Emissions Unit ID:** Combustion Turbine (P001)

**Activity Description:** Natural Gas Fired Combustion Turbine Used to produce Electricity During peak Demand Periods

#### A. State and Federally Enforceable Section

##### I. Applicable Emissions Limitations and/or Control Requirements

- 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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
422.57 mmBtu/hr, natural gas-fired turbine #1, with water injection	OAC rule 3745-31-05 (A)(3) (PTI# 03-13161)	3.0 lbs particulate emissions (PE)/hr 13.14 TPY PE  0.12 lb sulfur dioxide (SO <sub>2</sub> )/hr 0.53 TPY SO <sub>2</sub>  263.8 lbs carbon monoxide (CO)/hr  75.7 lbs volatile organic compounds (VOC)/hr  71.2 lbs nitrogen oxides (NO <sub>x</sub> )/hr  See A.II.  The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A), 3745-31-05(D), 3745-21-08(B) and 3745-23-06(B), and 40 CFR, Part 60 Subpart GG.  98.0 TPY CO, as a rolling, 12-month summation  30.0 TPY VOC, as a rolling, 12-month summation  65.0 TPY NO <sub>x</sub> , as a rolling, 12-month summation  2,250 hours of operation, based upon a rolling, 12-month summation
	OAC rule 3745-31-05 (D) (PTI# 03-13161)	
	OAC rule 3745-18-06(F)	See A.I.2.c.
	OAC rule 3745-17-11(B)(4)	See A.I.2.c.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20 percent opacity, as a six-minute average, except as specified by rule.
	40 CFR, Part 60 Subpart GG	See A.I.2.c.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.d.

**2. Additional Terms and Conditions**

- 2.a** The 3.0 lbs PE/hr, 13.14 TPY PE, 0.12 lb SO<sub>2</sub>/hr and 0.53 TPY SO<sub>2</sub> allowable emissions rates are established to reflect the potentials to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limitations.
- 2.b** Best available technology (BAT) for this emissions unit shall be the use of natural gas and water injection.
- 2.c** 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.d** The permittee has satisfied the "best available control techniques and operating practices" and "latest available control techniques and operating practices" required pursuant to OAC rules 3745-21-08 and 3745-23-06, respectively by committing to comply with the best available technology requirements established pursuant to OAC rule 3745-31-05(A)(3) in Permit to Install 03-13161.

**II. Operational Restrictions**

- 1. The maximum number of the annual operating hours for this emissions unit shall not exceed 2,250 hours, based upon a rolling, 12-month summation of the monthly numbers of operating hours.
- 2. The permittee shall operate and maintain a water injection system for the control of NO<sub>x</sub> emissions from this emissions unit.
- 3. The permittee shall burn only natural gas in this emissions unit.
- 4. The sulfur content of the natural gas used in this emissions unit shall not exceed 0.05%, by weight (this limit is at the threshold limit for acid rain monitoring requirements and is more stringent than the sulfur limit required by 40 CFR, Part 60, Subpart GG).

**III. Monitoring and/or Record Keeping Requirements**

- 1. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install # 03-13161, issued on 8/18/99: paragraphs A.III.2., A.III.4., A.III.5., A.III.6., and A.III.7. The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

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

2. 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 summation of the number of hours of operation.
  - c. The quantity of natural gas fired, in million cubic feet.
  - d. The emission rates for NO<sub>x</sub>, CO and VOC, in tons, calculated as follows:
    - i. for VOC: multiply the emission factor of 0.0021 lb VOC/mmBtu (from AP-42, Table 3.1-2a (revised 4/2000) by the amount of natural gas fired (mm cu. ft/month), and by the heat content of natural gas (mmBtu/mm cu. ft), and then divide by 2000;
    - ii. for NO<sub>x</sub>: sum the hourly NO<sub>x</sub> emission rates, lbs/hr, from the NO<sub>x</sub> CEM data measurement and recording in section A.III.6., for the calendar month, and then divide by 2000; and
    - iii. for CO: sum the hourly CO emission rates, lbs/hr, from the CO CEM data measurement and recording in section A.III.5., for the calendar month, and then divide by 2000.
  - e. The rolling, 12-month emission rates for NO<sub>x</sub>, CO and VOC, in tons.
3. 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.
4. The permittee shall determine and record the sulfur content of the natural gas being fired in this emission unit on a quarterly basis in accordance with the permittee's approved custom schedule.

Analyses for the purposes of determining the sulfur content of the natural gas may be performed by the permittee, the fuel vendor, or any other qualified agency as follows:

ASTM D 2880-71, 78, or 96 shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-80 or 90 (Re-approved 1994), D 3031-81, D 4084-82 or 94, or D 3246-81, 92, or 96 shall be used for the sulfur content of gaseous fuels. 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 Director.

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

5. The permittee shall perform the following monitoring and record keeping requirements for the Continuous CO Monitor:
  - a. The permittee shall operate and maintain equipment to continuously monitor and record CO from this emissions unit in units established in this permit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.
  - b. The permittee shall maintain records of all data obtained by the continuous CO monitoring system including, but not limited to, parts per million CO on an instantaneous (one minute) basis, emissions of CO in units established in this permit in the appropriate averaging period (i.e., lbs/hr for each hour and each rolling, 3-hour period), results of daily zero/span calibration checks, and the magnitude of manual calibration adjustments.
  - c. The permittee shall maintain a written quality assurance/quality control plan for the continuous CO monitoring system designed to ensure continuous valid and representative readings of CO. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. The quality assurance/quality control plan and a logbook dedicated to the continuous CO monitoring system must be kept on site and available for inspection during regular office hours.
  - d. A statement of certification of the existing continuous CO monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 4. Proof of certification shall be made available to the Director (the Ohio EPA, Northwest District Office) upon request.
6. The permittee shall perform the following monitoring and record keeping requirements for the Continuous NOx Monitor:
  - a. The permittee shall operate and maintain equipment to continuously monitor and record NOx from this emissions unit in units established in this permit. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13.
  - b. The permittee shall maintain records of all data obtained by the continuous NOx monitoring system including, but not limited to, parts per million NOx on an instantaneous (one-minute) basis, emissions of NOx in units established in this permit in the appropriate averaging period (i.e., lbs/hr for each hour and each rolling, 3-hour period), results of daily zero/span calibration checks, and the magnitude of manual calibration adjustments.
  - c. The permittee shall maintain a written quality assurance/quality control plan for the continuous NOx monitoring system designed to ensure continuous valid and representative readings of NOx. The plan shall follow the requirements of 40 CFR Part 60, Appendix F. 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.
  - d. A statement of certification of the existing continuous NOx monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2 and/or 40 CFR Part 75. Proof of certification shall be made available to the Director (the Ohio EPA, Northwest District Office) upon request.

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

7. The permittee shall perform the following monitoring and record keeping requirements for the Continuous Oxygen Monitor:

a. The permittee shall operate and maintain existing equipment to continuously monitor and record O<sub>2</sub> from this emissions unit in units of percent O<sub>2</sub>. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13 and/or 40 CFR Part 75.

The permittee shall maintain records of all data obtained by the continuous O<sub>2</sub> monitoring system including, but not limited to percent O<sub>2</sub> on an instantaneous (one-minute) basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

b. A statement of certification of the existing continuous O<sub>2</sub> monitoring system shall be maintained on site and shall consist of a letter from the Ohio EPA detailing the results of an Agency review of the certification tests and a statement by the Agency that the system is considered certified in accordance with the requirements of 40 CFR Part 60, Appendix B, Performance Specification 3 and/or 40 CFR Part 75. Proof of certification shall be made available to the Director (the Ohio EPA, Northwest District Office) upon request.

c. The permittee shall maintain a written quality assurance/quality control plan for the continuous O<sub>2</sub> monitoring system designed to ensure continuous valid and representative readings of O<sub>2</sub> emissions. The plan shall follow the requirements of 40 CFR Part 60, Appendix F and/or 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated to the continuous O<sub>2</sub> monitoring system must be kept on site and available for inspection during regular office hours.

8. The permittee shall keep a log of all periods of time during which the control system (water injection) was not operating, while the emissions unit was in operation, and ice fog was formed and deemed a traffic hazard by the permittee.

9. In lieu of monitoring the nitrogen content of the natural gas being fired in the turbine and the ratio of water to fuel being fired as required by 40 CFR 60, Subpart GG [section 60.334(b) and section 60.334(a), respectively], the permittee shall install and operate systems to continuously monitor and record emissions of NO<sub>x</sub> from this emissions unit in accordance with section A.III.6. of this permit.

10. In lieu of submitting excess emissions reports required per 40 CFR, Part 60.334, the permittee shall submit excess emissions reports for this emissions unit in accordance with Section A.IV. of this permit.

11. The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

- a. the color of the emissions;
- b. whether the emissions are representative of normal operations;
- c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- d. the total duration of any visible emission incident; and
- e. any corrective actions taken to eliminate the visible emissions.

12. The information management system for this emission unit shall be capable of monitoring and recording the fuel flow in million cu. ft. and hours of operation.

### IV. Reporting Requirements

1. The permittee shall submit quarterly summaries that include a log of all periods of time during which the control system (water injection) was not operating, while the emissions unit was in operation, and ice fog was formed and deemed a traffic hazard by the permittee. The report shall include the ambient conditions existing during the period, the date and time the air pollution control system was deactivated, and the date and time when the air pollution control system was reactivated. These reports shall be postmarked by April 30, July 30, October 30 and January 30 and shall cover the previous calendar quarters.

#### **IV. Reporting Requirements (continued)**

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

- a. All exceedances of the rolling, 12-month hourly operating restriction of 2,250.
- b. All exceedances of the rolling, 12-month CO limitation of 98 tons.
- c. All exceedances of the rolling, 12-month VOC limitation of 30 tons.
- d. All exceedances of the rolling, 12-month NOx limitation of 65 tons.

The permittee shall submit the quarterly deviation reports to the Director in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

**3.** 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.

**4.** The permittee shall submit quarterly deviation (excursion) reports that identify all instances when the sulfur content of the natural gas used in this emissions unit exceeded 0.05%, by weight.

The permittee shall submit the quarterly deviation reports to the Director in accordance with paragraph A.1.c. of the General Terms and Conditions of this permit.

**5.** Data Reporting - Continuous CO Emissions Monitoring

**5.a** The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Northwest District Office documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any) of all instances of CO values in excess of the hourly emission limitation of 263.8 lbs CO/hr, based upon the rolling, 3-hour average emission rates. These reports shall also contain the total CO emissions for the calendar quarter (in tons).

**5.b** The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Northwest District Office documenting any continuous CO monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.

**5.c** If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.

**6.** Data Reporting - Continuous NOx Emissions Monitoring

**6.a** The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Northwest District Office documenting the date, commencement and completion times, duration, magnitude, reason (if known), and corrective actions taken (if any), of all instances of NOx values in excess of the hourly emission limitation of 75.7 lbs NO/hr, based upon the rolling, 3-hour average emission rates. These reports shall also contain the total NOx emissions for the calendar quarter (in tons).

#### **IV. Reporting Requirements (continued)**

- 6.b** The permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Northwest District Office documenting any continuous NOx monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall also be included in the quarterly report.
- 6.c** If there are no excess emissions during the calendar quarter, the permittee shall submit a statement to that effect along with the emissions unit operating time during the reporting period and the date, time, reason, and corrective action(s) taken for each time period of emissions unit, control equipment, and/or monitoring system malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line also shall be included in the quarterly report. These quarterly excess emission reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.
- 7.** Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Ohio EPA, Northwest District Office documenting all instances of continuous O2 monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for each time period of emissions unit malfunctions. The total operating time of the emissions unit and the total operating time of the analyzer while the emissions unit was on line shall be included in the quarterly report. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall address the data obtained during the previous calendar quarter.
- 8.** The permittee shall submit semiannual written reports that (a) identify all days during which any visible particulate emissions were observed from the stack serving this emissions unit and (b) describe any corrective actions taken to eliminate the visible particulate emissions. These reports shall be submitted to the Director (the Ohio EPA, Northwest District Office) by January 31 and July 31 of each year and shall cover the previous 6-month period.

#### **V. Testing Requirements**

- 1.** Compliance with the emission limitations specified in section A.I. of the terms and conditions of this permit shall be determined in accordance with the following methods:

- 1.a** Emission Limitations:  
3.0 lbs PE/hr & 13.14 TPY

Applicable Compliance Method:

The hourly allowable PE limitation was established by multiplying a company-supplied emission factor of 0.007 lb PE/mmBtu by a maximum heat input rate of 422.57 mmBtu/hr.

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

Compliance with the annual PE limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was determined by multiplying the hourly limitation by 8760 hrs/yr, and then dividing by 2000 lbs/ton).

## V. Testing Requirements (continued)

- 1.b** Emission Limitations:  
0.12 lb SO<sub>2</sub>/hr & 0.53 TPY

Applicable Compliance Method:

The hourly allowable SO<sub>2</sub> emission limitation represents the facility's potential to emit based on a maximum sulfur content of 0.05%. Therefore, as long as the permittee is in compliance with the natural gas maximum sulfur content of 0.05%, compliance with the hourly SO<sub>2</sub> emission limitation shall be assumed.

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

Compliance with the annual PE limitation shall be assumed as long as compliance with the hourly limitation is maintained (the annual limitation was determined by multiplying the hourly limitation by 8760, and then dividing by 2000).

- 1.c** Emission Limitation:  
263.8 lbs CO/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable CO emission limitation above in accordance with the record keeping requirements specified in section A.III.5 of this permit.

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

- 1.d** Emission Limitation:  
75.7 lbs VOC/hr

Applicable Compliance Method:

The permittee may determine compliance with the hourly allowable VOC emission limitation by multiplying the emission factor from AP-42, Table 3.1-2a (revised 4/00) of 0.0021 lb OC/mmBtu by the maximum heat input rate of 422.57 mmBtu/hr.

If required, the permittee shall demonstrate compliance the hourly allowable VOC emission limitation by testing in accordance with Methods 18, 25, or 25A, as appropriate, of 40 CFR, Part 60, Appendix A.

- 1.e** Emission Limitation:  
71.2 lbs NO<sub>x</sub>/hr

Applicable Compliance Method:

The permittee shall demonstrate compliance with the hourly allowable NO<sub>x</sub> emission limitation in accordance with the record keeping requirements specified in section A.III.6 of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable NO<sub>x</sub> emission limitation by testing in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

- 1.f** Emission Limitation:  
98.0 TPY CO, as a rolling, 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the annual allowable CO emission limitation based on the monitoring and record keeping requirements specified in section A.III.2. of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable NO<sub>x</sub> emission limitation by testing in accordance with Methods 1 - 4 and 10 of 40 CFR, Part 60, Appendix A.

## **V. Testing Requirements (continued)**

- 1.g** Emission Limitation:  
30.0 TPY VOC, as a rolling, 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with with the annual allowable VOC emission limitation based on the monitoring and record keeping requirements specified in section A.III.2. of this permit.

- 1.h** Emission Limitation:  
65.0 TPY NO<sub>x</sub>, as a rolling, 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with with the annual allowable NO<sub>x</sub> emission limitation based on the monitoring and record keeping requirements specified in section A.III.2. of this permit.

- 1.i** Emission Limitation:  
2,250 hours of operation, based on a rolling, 12-month summation

Applicable Compliance Method:

The permittee shall demonstrate compliance with the number of hours of operation restriction based on the monitoring and record keeping requirements specified in section A.III.2. of this permit.

- 1.j** Emission Limitation:  
0.05%, by weight, sulfur content of the natural gas

Applicable Compliance Method:

The permittee shall demonstrate compliance with the sulfur content restriction based on the monitoring and record keeping requirements specified in section A.III.4. of this permit.

- 1.k** Emission Limitation:  
Visible PE shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with the visible PE limitation in accordance with OAC rule 3745-17-03 (B)(1).

- 2.** In lieu of complying with the test methods and procedures required under 40 CFR, Part 60.335, the permittee shall comply with the testing and continuous emissions monitoring requirements for this emissions unit in accordance with sections A.III and A.V.1 and 2 of this permit.

## **VI. Miscellaneous Requirements**

**None**

**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.

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/ Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
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**2. Additional Terms and Conditions**

None

**II. Operational Restrictions**

None

**III. Monitoring and/or Record Keeping Requirements**

None

**IV. Reporting Requirements**

None

**V. Testing Requirements**

None

**VI. Miscellaneous Requirements**

None

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