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

09/24/03

CERTIFIED MAIL

RE: Preliminary Proposed Title V
Chapter 3745-77 permit

03-20-01-0006
Toledo Edison Co., Richland Substation
Marjorie Gail Twymon
First Energy Corporation
76 South Main Street
Akron, OH 44308

Dear Marjorie Gail Twymon:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 06/30/03. 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. **In order to facilitate our review of all the comments or concerns you may have with the enclosed preliminary proposed permit, please provide a hand marked-up copy of the permit showing the changes you think are necessary, along with any additional summary comments, within fourteen (14) days from your receipt of this letter to:**

Ohio EPA, Division of Air Pollution Control
Jim Orlemann, Manager, Engineering Section
Preliminary Proposed Title V Permit Correspondence
122 South Front Street
Columbus, Ohio 43215

and

Northwest District Office
347 North Dunbridge Road
Bowling Green, OH 43402
(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.

Sincerely,

Michael W. Ahern

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: 09/24/03	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: 03-20-01-0006 to:

Toledo Edison Co., Richland Substation
Carpenter Rd. S/U.S. 24
Defiance, OH 43512

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

B001 (Peaker No. 1)
No. 2 oil-fired combustion turbine with option to burn natural gas

B002 (Peaker No. 2)
Natural gas-fired combustion turbine with option to burn No. 2 oil.

B003 (Peaker No. 3)
Natural gas-fired combustion turbine with option to burn No. 2 oil.

P001 (Peaker No. 4)
Natural gas-fired combustion turbine with option to burn No. 2 oil.

P002 (Peaker No. 5)
Natural gas-fired combustion turbine with option to burn No. 2 oil.

P003 (Peaker No. 6)
Natural gas-fired combustion turbine with option to burn No. 2 oil.

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

OHIO ENVIRONMENTAL PROTECTION AGENCY

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, 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 Enforcable Section

None

B. State Only Enforceable Section

1. The following insignificant emissions units are located at this facility:

Z001 - 6 mmBtu/hr, natural gas-fired pre-heater; Z002 - 0.0015 mmBtu/hr, natural gas-fired pre-heater; Z003 - 0.0015 mmBtu/hr, natural gas-fired pre-heater; Z004 - 0.0015 mmBtu/hr, natural gas-fired preheater; Z005 - emergency diesel generator; Z006 - emergency diesel generator; and Z007 - emergency diesel generator.

Each insignificant emissions unit at this facility must comply with all applicable State and federal regulations, as well as any emission limitations and/or control requirements contained within a Permit to Install (PTI) for the emissions unit.

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Peaker No. 1 (B001)

Activity Description: No. 2 oil-fired combustion turbine with option to burn natural gas

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
327 mmBtu/hr, #2 fuel oil-fired simple cycle turbine generator with natural gas backup (peaker #1)	OAC rule 3745-31-05(D) (PTI #03-13247)	165.14 lbs sulfur dioxide (SO2)/hr (from this emissions unit) 72.55 tons SO2/rolling, 12-month summation (for emissions units B001, B002 and B003, combined) 35.97 lbs carbon monoxide (CO)/hr (from this emissions unit) 25.09 tons CO/rolling, 12-month summation (for emissions units B001, B002 and B003, combined) 7.85 lbs volatile organic compounds (VOC)/hr (from this emissions unit) 5.47 tons VOC/rolling, 12-month summation (for emissions units B001, B002 and B003, combined) 228.25 lbs nitrogen oxides (NOx)/hr (from this emissions unit) 100.35 tons NOx/rolling, 12-month summation (for emissions units B001, B002 and B003, combined) 12.43 lbs particulate emissions (PE)/hr (from this emissions unit) 5.46 tons PE/rolling, 12-month summation (for emissions units B001, B002 and B003, combined) See A.II.1, A.II.2. and A.II.3.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(4)	0.040 lb PE/mmBtu of actual heat input
	OAC rule 3745-18-26(C)	0.7 lb SO2/mmBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The maximum annual natural gas usage for emissions units B001, B002 and B003, combined, shall not exceed 445 mm cu. ft feet, based upon a rolling, 12-month summation.

2. The maximum #2 fuel oil/distillate oil usage for emissions units B001, B002 and B003, combined, shall not exceed 2,080,000 gallons, based upon a rolling, 12-month summation.

3. The permittee shall not use a combination of the fuel usage restrictions in section A.II.1. and A.II.2. for emissions units B001, B002 and B003, combined, that would result in NOx emissions of more than 100.35 tons of NOx per rolling, 12-month period, based upon an emission factor of 0.698 lb/mmBtu for fuel oil and 0.44 lb/mmBtu for natural gas.

4. The permittee shall burn only #2 fuel oil/distillate oil and/or natural gas in this emissions unit.

5. The quality of the no. 2 fuel oil burned in this emissions unit shall have a sulfur content that is sufficient to comply with the allowable SO2 emission limitation specified in Section A.I above.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and maintain each month the following information for emissions units B001, B002 and B003, combined:

a. the amount of natural gas combusted, in mm cu. ft;

b. the amount of #2 fuel oil or distillate oil combusted; in gallons; and

c. the rolling, 12-month summations for the monthly natural gas usage rates, in mm cu. ft, and for the monthly no. 2 fuel oil usage rates, in gallons.

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

2. The permittee shall calculate and maintain each month the following information for emissions units B001, B002 and B003, combined:

a. the calculated SO2 emissions, in tons, using the following equation:

i. for natural gas usage, multiply the amount of natural gas combusted, from section A.III.1.a above, by the emission facotr of (lb SO2/mm cu. ft*), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the amount of fuel oil combusted, from section A.III.1.b above, by the emission factor of (lb SO2/1000 gallon*), and then divide by 2000; and

iii. sum i + ii.

b. the rolling, 12-month summation of the monthly SO2 emission rates, in tons.

*emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

3. The permittee shall calculate and maintain each month the following information for emissions units B001, B002 and B003, combined:

a. the calculated CO emissions, in tons, using the following equation:

i. for natural gas usage, multiply the amount of natural gas combusted, from section A.III.1.a above, by the emission factor of (lb CO/mm cu. ft*), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the amount of fuel oil combusted, from section A.III.1.b above, by the emission factor of (lb CO/1000 gallon*), and then divide by 2000; and

iii. sum i + ii.

b. the rolling, 12-month summation of the monthly CO emission rates, in tons.

*emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

4. The permittee shall calculate and maintain each month the following information for emissions units B001, B002 and B003, combined:

a. the calculated VOC emissions, in tons, using the following equation:

i. for natural gas usage, multiply the amount of natural gas combusted, from section A.III.1.a above, by the emission factor of (lb VOC/mm cu. ft*), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the amount of fuel oil combusted, from section A.III.1.b above, by the emission factor of (lb VOC/1000 gallon*), and then divide by 2000; and

iii. sum i + ii.

b. the rolling, 12-month summation of the monthly VOC emission rates, in tons.

*emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

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

5. The permittee shall calculate and maintain each month the following information for emissions units B001, B002 and B003, combined:

a. the calculated NOx emissions, in tons, using the following equation:

i. for natural gas usage, multiply the amount of natural gas combusted, from section A.III.1.a above, by the emission factor of (lb NOx/mm cu. ft*), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the amount of fuel oil combusted, from section A.III.1.b above, by the emission factor of (lb NOx/1000 gallon*), and then divide by 2000; and

iii. sum i + ii.

b. the rolling, 12-month summation of the monthly NOx emission rates, in tons.

*emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

6. The permittee shall calculate and maintain each month the following information for emissions units B001, B002 and B003, combined:

a. the calculated PE, in tons, using the following equation:

i. for natural gas usage, multiply the amount of natural gas combusted, from section A.III.1.a above, by the emission factor of (lb PE /mm cu. ft*), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the amount of fuel oil combusted, from section A.III.1.b above, by the emission factor of (lb PE /1000 gallon*), and then divide by 2000; and

iii. sum i + ii.

b. the rolling, 12-month summation of the monthly PE rates, in tons.

*emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

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

8. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as ASTM method D240 (for heat content) and ASTM method D4294 (for sulfur content)), or equivalent methods as approved by the Director.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month fuel usage restrictions of 445 mm cu. ft (for natural gas usage) and 2,080,000 gallons (for fuel oil usage). These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than #2 fuel oil, distillate oil or natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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

a. all exceedances of the rolling, 12-month SO2 emission limitation of 72.55 tons;

b. all exceedances of the rolling, 12-month CO emission limitation of 25.09 tons;

c. all exceedances of the rolling, 12-month VOC emission limitation of 5.47 tons;

d. all exceedances of the rolling, 12-month NOx emission limitation of 100.35 tons; and

e. all exceedances of the rolling, 12-month PE limitation of 5.46 tons.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

4. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record that shows a deviation of the allowable sulfur dioxide emission limitation (lb/mmBtu), as shown by the calculated sulfur dioxide emission rates from Section A.III.8 above. The notification shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the deviation occurs.

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 testing shall be performed at 100% of peak load.

b. The emission testing shall be conducted within 3 months after issuance of this permit, during the third year of this permit, and within 6 months prior to permit expiration.

c. Two separate emission tests shall be conducted to demonstrate compliance with the NOx, CO, VOC, SO2, and PE emission limits. One test shall be conducted while firing natural gas, and the other while firing #2 fuel oil/distillate oil.

d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. for NOx, Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A;

ii. for PE, Methods 1 - 5 of 40 CFR, Part 60, Appendix A;

iii. for SO2, Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A;

iv. for VOC, Method 25 of 40 CFR, Part 60; and

v. 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.

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

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).

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.

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

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

V. Testing Requirements (continued)

2.a Emission Limitations: 165.14 lbs SO2/hr and 72.55 tons SO2/rolling, 12-month summation

Applicable Compliance Method:
Compliance with the hourly SO2 emission limitation shall be based on the results of the emission testing conducted in accordance with the Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable SO2 emission limitation shall be based on the record keeping requirements established in section A.III of this permit.

2.b Emission Limitations: 35.97 lbs CO/hr and 25.09 tons CO/rolling, 12-month summation

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

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

2.c Emission Limitations: 7.85 lbs VOC/hr and 5.47 VOC tons/rolling, 12-month summation

Applicable Compliance Method:
Compliance with the hourly VOC emission limitation shall be based on the results of the emission testing conducted in accordance with the Methods 1-4 and 25 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable VOC emission limitation shall be based on the record keeping requirements established in section A.III of this permit.

2.d Emission Limitations: 228.25 lbs NOx/hr and 100.35 NOx tons/rolling, 12-month summation

Applicable Compliance Method:
Compliance with the hourly NOx emission limitation shall be based on the results of the emission testing conducted in accordance with the Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

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

2.e Emission Limitations: 12.43 lbs PE/hr and 5.46 PE tons/rolling, 12-month summation

Applicable Compliance Method:
Compliance with the hourly PE limitation shall be based on the results of the emission testing conducted in accordance with the Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable PE limitation shall be based on the record keeping requirements established in section A.III of this permit.

2.f Emission Limitation: Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Appliable Compliance Method:
If required, compliance with the visible particulate emissions limitation shall be determined in accordance with OAC rule 3745-17-03(B)(1).

2.g Emission Limitation: 0.040 lb PE/mmBtu of actual heat input

Applicable Compliance Method:
Compliance with the PE emission limitation above shall be based on the results of the emission testing conducted in accordance with the Methods 1-5 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

2.h Emission Limitation: 0.7 lb SO2/mmBtu of actual heat input

Applicable Compliance Method:
Compliance with the SO2 emission limitation above shall be based on the results of the emission testing conducted in accordance with the Methods 1-4 and Method 6 of 40 CFR, Part 60, Appendix A.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Peaker No. 2 (B002)

Activity Description: Natural gas-fired combustion turbine with option to burn No. 2 oil.

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
327 mmBtu/hr, natural gas-fired simple cycle turbine generator with #2 fuel oil backup (peaker #2)	OAC rule 3745-31-05(D) (PTI #03-13247)	165.14 lbs sulfur dioxide (SO2)/hr (from this emissions unit) 72.55 tons SO2/rolling, 12-month summation (for emissions units B001, B002 and B003, combined) 35.97 lbs carbon monoxide (CO)/hr (from this emissions unit) 25.09 tons CO/rolling, 12-month summation (for emissions units B001, B002 and B003, combined) 7.85 lbs volatile organic compounds (VOC)/hr (from this emissions unit) 5.47 tons VOC/rolling, 12-month summation (for emissions units B001, B002 and B003, combined) 228.25 lbs nitrogen oxides (NOx)/hr (from this emissions unit) 100.35 tons NOx/rolling, 12-month summation (for emissions units B001, B002 and B003, combined) 12.43 lbs particulate emissions (PE)/hr (from this emissions unit) 5.46 tons PE/rolling, 12-month summation (for emissions units B001, B002 and B003, combined) See A.II.1, A.II.2. and A.II.3.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(4)	0.040 lb PE/mmBtu of actual heat input
	OAC rule 3745-18-26(C)	0.7 lb SO2/mmBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The maximum annual natural gas usage for emissions units B001, B002 and B003, combined, shall not exceed 445 mm cu. ft feet, based upon a rolling, 12-month summation.

2. The maximum #2 fuel oil/distillate oil usage for emissions units B001, B002 and B003, combined, shall not exceed 2,080,000 gallons, based upon a rolling, 12-month summation.

3. The permittee shall not use a combination of the fuel usage restrictions in section A.II.1. and A.II.2. for emissions units B001, B002 and B003, combined, that would result in NOx emissions of more than 100.35 tons of NOx per rolling, 12-month period, based upon an emission factor of 0.698 lb/mmBtu for fuel oil and 0.44 lb/mmBtu for natural gas.

4. The permittee shall burn only #2 fuel oil/distillate oil and/or natural gas in this emissions unit.

5. The quality of the no. 2 fuel oil burned in this emissions unit shall have a sulfur content that is sufficient to comply with the allowable SO2 emission limitation specified in Section A.I above.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and maintain each month the following information for emissions units B001, B002 and B003, combined:

a. the amount of natural gas combusted, in mm cu. ft;

b. the amount of #2 fuel oil or distillate oil combusted; in gallons; and

c. the rolling, 12-month summations for the monthly natural gas usage rates, in mm cu. ft, and for the monthly no. 2 fuel oil usage rates, in gallons.

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

2. The permittee shall calculate and maintain each month the following information for emissions units B001, B002 and B003, combined:

a. the calculated SO2 emissions, in tons, using the following equation:

i. for natural gas usage, multiply the amount of natural gas combusted, from section A.III.1.a above, by the emission facotr of (lb SO2/mm cu. ft*), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the amount of fuel oil combusted, from section A.III.1.b above, by the emission factor of (lb SO2/1000 gallon*), and then divide by 2000; and

iii. sum i + ii.

b. the rolling, 12-month summation of the monthly SO2 emission rates, in tons.

*emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

3. The permittee shall calculate and maintain each month the following information for emissions units B001, B002 and B003, combined:

a. the calculated CO emissions, in tons, using the following equation:

i. for natural gas usage, multiply the amount of natural gas combusted, from section A.III.1.a above, by the emission factor of (lb CO/mm cu. ft*), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the amount of fuel oil combusted, from section A.III.1.b above, by the emission factor of (lb CO/1000 gallon*), and then divide by 2000; and

iii. sum i + ii.

b. the rolling, 12-month summation of the monthly CO emission rates, in tons.

*emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

4. The permittee shall calculate and maintain each month the following information for emissions units B001, B002 and B003, combined:

a. the calculated VOC emissions, in tons, using the following equation:

i. for natural gas usage, multiply the amount of natural gas combusted, from section A.III.1.a above, by the emission factor of (lb VOC/mm cu. ft*), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the amount of fuel oil combusted, from section A.III.1.b above, by the emission factor of (lb VOC/1000 gallon*), and then divide by 2000; and

iii. sum i + ii.

b. the rolling, 12-month summation of the monthly VOC emission rates, in tons.

*emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

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

5. The permittee shall calculate and maintain each month the following information for emissions units B001, B002 and B003, combined:

a. the calculated NOx emissions, in tons, using the following equation:

i. for natural gas usage, multiply the amount of natural gas combusted, from section A.III.1.a above, by the emission factor of (lb NOx/mm cu. ft*), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the amount of fuel oil combusted, from section A.III.1.b above, by the emission factor of (lb NOx/1000 gallon*), and then divide by 2000; and

iii. sum i + ii.

b. the rolling, 12-month summation of the monthly NOx emission rates, in tons.

*emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

6. The permittee shall calculate and maintain each month the following information for emissions units B001, B002 and B003, combined:

a. the calculated PE, in tons, using the following equation:

i. for natural gas usage, multiply the amount of natural gas combusted, from section A.III.1.a above, by the emission factor of (lb PE /mm cu. ft*), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the amount of fuel oil combusted, from section A.III.1.b above, by the emission factor of (lb PE /1000 gallon*), and then divide by 2000; and

iii. sum i + ii.

b. the rolling, 12-month summation of the monthly PE rates, in tons.

*emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

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

8. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as ASTM method D240 (for heat content) and ASTM method D4294 (for sulfur content)), or equivalent methods as approved by the Director.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month fuel usage restrictions of 445 mm cu. ft (for natural gas usage) and 2,080,000 gallons (for fuel oil usage). These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than #2 fuel oil, distillate oil or natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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

a. all exceedances of the rolling, 12-month SO2 emission limitation of 72.55 tons;

b. all exceedances of the rolling, 12-month CO emission limitation of 25.09 tons;

c. all exceedances of the rolling, 12-month VOC emission limitation of 5.47 tons;

d. all exceedances of the rolling, 12-month NOx emission limitation of 100.35 tons; and

e. all exceedances of the rolling, 12-month PE limitation of 5.46 tons.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

4. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record that shows a deviation of the allowable sulfur dioxide emission limitation (lb/mmBtu), as shown by the calculated sulfur dioxide emission rates from Section A.III.8 above. The notification shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the deviation occurs.

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 testing shall be performed at 100% of peak load.

b. The emission testing shall be conducted within 3 months after issuance of this permit, during the third year of this permit, and within 6 months prior to permit expiration.

c. Two separate emission tests shall be conducted to demonstrate compliance with the NOx, CO, VOC, SO2, and PE emission limits. One test shall be conducted while firing natural gas, and the other while firing #2 fuel oil/distillate oil.

d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. for NOx, Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A;

ii. for PE, Methods 1 - 5 of 40 CFR, Part 60, Appendix A;

iii. for SO2, Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A;

iv. for VOC, Method 25 of 40 CFR, Part 60; and

v. 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.

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

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).

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.

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

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

V. Testing Requirements (continued)

2.a Emission Limitations: 165.14 lbs SO2/hr and 72.55 tons SO2/rolling, 12-month summation

Applicable Compliance Method:
Compliance with the hourly SO2 emission limitation shall be based on the results of the emission testing conducted in accordance with the Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable SO2 emission limitation shall be based on the record keeping requirements established in section A.III of this permit.

2.b Emission Limitations: 35.97 lbs CO/hr and 25.09 tons CO/rolling, 12-month summation

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

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

2.c Emission Limitations: 7.85 lbs VOC/hr and 5.47 VOC tons/rolling, 12-month summation

Applicable Compliance Method:
Compliance with the hourly VOC emission limitation shall be based on the results of the emission testing conducted in accordance with the Methods 1-4 and 25 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable VOC emission limitation shall be based on the record keeping requirements established in section A.III of this permit.

2.d Emission Limitations: 228.25 lbs NOx/hr and 100.35 NOx tons/rolling, 12-month summation

Applicable Compliance Method:
Compliance with the hourly NOx emission limitation shall be based on the results of the emission testing conducted in accordance with the Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

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

2.e Emission Limitations: 12.43 lbs PE/hr and 5.46 PE tons/rolling, 12-month summation

Applicable Compliance Method:
Compliance with the hourly PE limitation shall be based on the results of the emission testing conducted in accordance with the Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable PE limitation shall be based on the record keeping requirements established in section A.III of this permit.

2.f Emission Limitation: Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Appliable Compliance Method:
If required, compliance with the visible particulate emissions limitation shall be determined in accordance with OAC rule 3745-17-03(B)(1).

2.g Emission Limitation: 0.040 lb PE/mmBtu of actual heat input

Applicable Compliance Method:
Compliance with the PE emission limitation above shall be based on the results of the emission testing conducted in accordance with the Methods 1-5 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

2.h Emission Limitation: 0.7 lb SO2/mmBtu of actual heat input

Applicable Compliance Method:
Compliance with the SO2 emission limitation above shall be based on the results of the emission testing conducted in accordance with the Methods 1-4 and Method 6 of 40 CFR, Part 60, Appendix A.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Peaker No. 3 (B003)

Activity Description: Natural gas-fired combustion turbine with option to burn No. 2 oil.

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
327 mmBtu/hr, natural gas-fired simple cycle turbine generator with #2 fuel oil backup (peaker #3)	OAC rule 3745-31-05(D) (PTI #03-13247)	165.14 lbs sulfur dioxide (SO2)/hr (from this emissions unit) 72.55 tons SO2/rolling, 12-month summation (for emissions units B001, B002 and B003, combined) 35.97 lbs carbon monoxide (CO)/hr (from this emissions unit) 25.09 tons CO/rolling, 12-month summation (for emissions units B001, B002 and B003, combined) 7.85 lbs volatile organic compounds (VOC)/hr (from this emissions unit) 5.47 tons VOC/rolling, 12-month summation (for emissions units B001, B002 and B003, combined) 228.25 lbs nitrogen oxides (NOx)/hr (from this emissions unit) 100.35 tons NOx/rolling, 12-month summation (for emissions units B001, B002 and B003, combined) 12.43 lbs particulate emissions (PE)/hr (from this emissions unit) 5.46 tons PE/rolling, 12-month summation (for emissions units B001, B002 and B003, combined) See A.II.1, A.II.2. and A.II.3.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.
	OAC rule 3745-17-11(B)(4)	0.040 lb PE/mmBtu of actual heat input
	OAC rule 3745-18-26(C)	0.7 lb SO2/mmBtu of actual heat input

2. Additional Terms and Conditions

None

II. Operational Restrictions

1. The maximum annual natural gas usage for emissions units B001, B002 and B003, combined, shall not exceed 445 mm cu. ft feet, based upon a rolling, 12-month summation.

2. The maximum #2 fuel oil/distillate oil usage for emissions units B001, B002 and B003, combined, shall not exceed 2,080,000 gallons, based upon a rolling, 12-month summation.

3. The permittee shall not use a combination of the fuel usage restrictions in section A.II.1. and A.II.2. for emissions units B001, B002 and B003, combined, that would result in NOx emissions of more than 100.35 tons of NOx per rolling, 12-month period, based upon an emission factor of 0.698 lb/mmBtu for fuel oil and 0.44 lb/mmBtu for natural gas.

4. The permittee shall burn only #2 fuel oil/distillate oil and/or natural gas in this emissions unit.

5. The quality of the no. 2 fuel oil burned in this emissions unit shall have a sulfur content that is sufficient to comply with the allowable SO2 emission limitation specified in Section A.I above.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall calculate and maintain each month the following information for emissions units B001, B002 and B003, combined:

a. the amount of natural gas combusted, in mm cu. ft;

b. the amount of #2 fuel oil or distillate oil combusted; in gallons; and

c. the rolling, 12-month summations for the monthly natural gas usage rates, in mm cu. ft, and for the monthly no. 2 fuel oil usage rates, in gallons.

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

2. The permittee shall calculate and maintain each month the following information for emissions units B001, B002 and B003, combined:

a. the calculated SO2 emissions, in tons, using the following equation:

i. for natural gas usage, multiply the amount of natural gas combusted, from section A.III.1.a above, by the emission facotr of (lb SO2/mm cu. ft*), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the amount of fuel oil combusted, from section A.III.1.b above, by the emission factor of (lb SO2/1000 gallon*), and then divide by 2000; and

iii. sum i + ii.

b. the rolling, 12-month summation of the monthly SO2 emission rates, in tons.

*emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

3. The permittee shall calculate and maintain each month the following information for emissions units B001, B002 and B003, combined:

a. the calculated CO emissions, in tons, using the following equation:

i. for natural gas usage, multiply the amount of natural gas combusted, from section A.III.1.a above, by the emission factor of (lb CO/mm cu. ft*), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the amount of fuel oil combusted, from section A.III.1.b above, by the emission factor of (lb CO/1000 gallon*), and then divide by 2000; and

iii. sum i + ii.

b. the rolling, 12-month summation of the monthly CO emission rates, in tons.

*emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

4. The permittee shall calculate and maintain each month the following information for emissions units B001, B002 and B003, combined:

a. the calculated VOC emissions, in tons, using the following equation:

i. for natural gas usage, multiply the amount of natural gas combusted, from section A.III.1.a above, by the emission factor of (lb VOC/mm cu. ft*), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the amount of fuel oil combusted, from section A.III.1.b above, by the emission factor of (lb VOC/1000 gallon*), and then divide by 2000; and

iii. sum i + ii.

b. the rolling, 12-month summation of the monthly VOC emission rates, in tons.

*emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

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

5. The permittee shall calculate and maintain each month the following information for emissions units B001, B002 and B003, combined:

a. the calculated NOx emissions, in tons, using the following equation:

i. for natural gas usage, multiply the amount of natural gas combusted, from section A.III.1.a above, by the emission factor of (lb NOx/mm cu. ft*), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the amount of fuel oil combusted, from section A.III.1.b above, by the emission factor of (lb NOx/1000 gallon*), and then divide by 2000; and

iii. sum i + ii.

b. the rolling, 12-month summation of the monthly NOx emission rates, in tons.

*emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

6. The permittee shall calculate and maintain each month the following information for emissions units B001, B002 and B003, combined:

a. the calculated PE, in tons, using the following equation:

i. for natural gas usage, multiply the amount of natural gas combusted, from section A.III.1.a above, by the emission factor of (lb PE /mm cu. ft*), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the amount of fuel oil combusted, from section A.III.1.b above, by the emission factor of (lb PE /1000 gallon*), and then divide by 2000; and

iii. sum i + ii.

b. the rolling, 12-month summation of the monthly PE rates, in tons.

*emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

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

8. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods (such as ASTM method D240 (for heat content) and ASTM method D4294 (for sulfur content)), or equivalent methods as approved by the Director.

IV. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify all exceedances of the rolling, 12-month fuel usage restrictions of 445 mm cu. ft (for natural gas usage) and 2,080,000 gallons (for fuel oil usage). These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

2. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than #2 fuel oil, distillate oil or natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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

a. all exceedances of the rolling, 12-month SO2 emission limitation of 72.55 tons;

b. all exceedances of the rolling, 12-month CO emission limitation of 25.09 tons;

c. all exceedances of the rolling, 12-month VOC emission limitation of 5.47 tons;

d. all exceedances of the rolling, 12-month NOx emission limitation of 100.35 tons; and

e. all exceedances of the rolling, 12-month PE limitation of 5.46 tons.

These reports shall be submitted in accordance with the General Terms and Conditions of this permit.

4. The permittee shall notify the Director (the Ohio EPA, Northwest District Office) in writing of any record that shows a deviation of the allowable sulfur dioxide emission limitation (lb/mmBtu), as shown by the calculated sulfur dioxide emission rates from Section A.III.8 above. The notification shall be sent to the Director (the Ohio EPA, Northwest District Office) within 45 days after the deviation occurs.

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 testing shall be performed at 100% of peak load.

b. The emission testing shall be conducted within 3 months after issuance of this permit, during the third year of this permit, and within 6 months prior to permit expiration.

c. Two separate emission tests shall be conducted to demonstrate compliance with the NOx, CO, VOC, SO2, and PE emission limits. One test shall be conducted while firing natural gas, and the other while firing #2 fuel oil/distillate oil.

d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. for NOx, Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A;

ii. for PE, Methods 1 - 5 of 40 CFR, Part 60, Appendix A;

iii. for SO2, Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A;

iv. for VOC, Method 25 of 40 CFR, Part 60; and

v. 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.

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

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).

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.

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

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

V. Testing Requirements (continued)

2.a Emission Limitations: 165.14 lbs SO2/hr and 72.55 tons SO2/rolling, 12-month summation

Applicable Compliance Method:
Compliance with the hourly SO2 emission limitation shall be based on the results of the emission testing conducted in accordance with the Methods 1-4 and 6 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable SO2 emission limitation shall be based on the record keeping requirements established in section A.III of this permit.

2.b Emission Limitations: 35.97 lbs CO/hr and 25.09 tons CO/rolling, 12-month summation

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

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

2.c Emission Limitations: 7.85 lbs VOC/hr and 5.47 VOC tons/rolling, 12-month summation

Applicable Compliance Method:
Compliance with the hourly VOC emission limitation shall be based on the results of the emission testing conducted in accordance with the Methods 1-4 and 25 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable VOC emission limitation shall be based on the record keeping requirements established in section A.III of this permit.

2.d Emission Limitations: 228.25 lbs NOx/hr and 100.35 NOx tons/rolling, 12-month summation

Applicable Compliance Method:
Compliance with the hourly NOx emission limitation shall be based on the results of the emission testing conducted in accordance with the Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

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

2.e Emission Limitations: 12.43 lbs PE/hr and 5.46 PE tons/rolling, 12-month summation

Applicable Compliance Method:
Compliance with the hourly PE limitation shall be based on the results of the emission testing conducted in accordance with the Methods 1 - 5 of 40 CFR, Part 60, Appendix A.

Compliance with the annual allowable PE limitation shall be based on the record keeping requirements established in section A.III of this permit.

2.f Emission Limitation: Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule.

Appliable Compliance Method:
If required, compliance with the visible particulate emissions limitation shall be determined in accordance with OAC rule 3745-17-03(B)(1).

2.g Emission Limitation: 0.040 lb PE/mmBtu of actual heat input

Applicable Compliance Method:
Compliance with the PE emission limitation above shall be based on the results of the emission testing conducted in accordance with the Methods 1-5 of 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

2.h Emission Limitation: 0.7 lb SO2/mmBtu of actual heat input

Applicable Compliance Method:
Compliance with the SO2 emission limitation above shall be based on the results of the emission testing conducted in accordance with the Methods 1-4 and Method 6 of 40 CFR, Part 60, Appendix A.

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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures

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

Part III - Terms and Conditions for Emissions Units

Emissions Unit ID: Peaker No. 4 (P001)

Activity Description: Natural gas-fired combustion turbine with option to burn No. 2 oil.

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
1431 mmBtu/hr (130 MW), natural gas-fired simple cycle turbine generator, with #2 fuel oil/distillate oil backup with water injection NOx reduction system (peaker #4)	OAC rule 3745-31-05(A)(3) (PTI #03-13247)	38.0 lbs of particulate emissions (PE)/hr 251.4 lbs nitrogen oxides (NOx)/hr, excluding startup/shutdown periods 300 lbs NOx/hr (during startup/shutdown periods) NOx emissions shall not exceed 25 ppmvd at 15% oxygen (as a 3-hour average), when firing natural gas, excluding startup/shutdown periods. NOx emissions shall not exceed 42 ppmvd NOx at 15% oxygen (as a 3-hour average), when firing #2 fuel oil/distillate oil, excluding startup/shutdown periods. 71.0 lbs sulfur dioxide (SO2)/hr 40.0 lbs carbon monoxide (CO)/hr, excluding startup/shutdown periods 281 lbs CO/hr (during startup/shutdown periods) 17.2 lbs volatile organic compounds (VOC)/hr 1.0 lb formaldehyde/hr Visible PE from any stack shall not exceed 10% opacity, as a 6-minute average, when firing natural gas.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
		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.
	OAC rule 3745-31-05(D) (PTI #03-13247)	65.3 tons SO2/rolling, 12-month summation (for emissions units P001, P002 and P003, combined) 192.9 tons CO/rolling, 12-month summation (for emissions units P001, P002 and P003, combined)(See A.I.2.d.) 15.8 tons VOC/rolling, 12-month summation (for emissions units P001, P002 and P003, combined) 238.7 tons NOx/rolling, 12-month summation (for emissions units P001, P002 and P003, combined) (See A.I.2.d.) 36.1 tons PE/rolling, 12-month summation (for emissions units P001, P002 and P003, combined) 1.7 tons formaldehyde/rolling, 12-month summation (for emissions units P001, P002 and P003, combined)
	OAC rule 3745-18-06(F)	See A.I.2.c.
	OAC rule 3745-17-11(B)(4)	See A.I.2.c.
	OAC rule 3745-17-07(A)	When firing #2 fuel oil/distillate oil, visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule. When firing natural gas, see A.I.2.c.
	40 CFR, Part 60, Subpart GG	See A.I.2.c.
	40 CFR, Part 75	See Part I, term and condition A.4.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.f.

2. Additional Terms and Conditions

2.a The hourly allowable emission limitations of 300 lbs NOx/hr (during startup and shutdown periods) and 281 lbs CO/hr (during startup and shutdown periods) were established for PTI purposes 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 The maximum heat input rate of this emissions unit is 1431 mmBtu/hr, when firing natural gas, and 1413 mmBtu/hr, when firing #2 fuel oil. These values correspond to a #2 fuel oil flow of 10,240 gallons/hr and a natural gas flow of 1.43 million cubic feet/hr. The facility's information management system shall be capable of monitoring and recording these fuel flows for this emissions unit. This emissions unit shall operate within 5% of these fuel flows, when firing #2 fuel oil/distillate oil, except for startup (not to exceed 45 minutes in duration) and shutdown (not to exceed 45 minutes in duration).

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 annual NOx and CO emissions include startup/shutdown emissions (at an estimated worst case rate of 300 startups/shutdowns annually, per turbine).

2.e Best available technology (BAT) for this emissions unit shall be the use of natural gas and # 2 fuel oil for fuel and the use of water injection to control NOx emissions.

2.f 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 03-13247.

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.

II. Operational Restrictions

1. The maximum annual fuel usage for emissions units P001, P002 and P003, combined, shall not exceed any of the following:

a. 4747.46 mm cu. ft of natural gas per rolling, 12-month period;

b. 18.84 million gallons of #2 fuel oil/distillate oil per rolling, 12-month period; and

c. 4747.46 million cubic feet of cumulative fuel usage, where:

1.0 million cubic feet of natural gas = 1.0 million cubic feet of cumulative fuel usage

1.0 million gallons of #2 oil/distillate oil = 252.0 million cubic feet of cumulative fuel usage

2. The permittee shall burn only #2 fuel oil, distillate oil and/or natural gas in this emissions unit.

3. The sulfur content of the # 2 fuel oil 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).

4. The permittee shall operate and maintain a water injection system for the control of NOx emissions from this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor the sulfur content of the fuel oil being fired in the turbine. The frequency of the monitoring shall be determined as follows:

a. If the turbine is supplied its fuel oil from a bulk storage tank, the values shall be determined on each occasion that fuel oil is transferred to the storage tank from any other source.

b. If the turbine is supplied its fuel oil without intermediate bulk storage the values shall be determined and recorded daily. The permittee or fuel oil vendor may develop custom fuel oil schedules for the determination of the values based on the design and operation of the affected facility and the characteristics of the fuel oil supply. These custom schedules shall be substantiated with data and must be approved by the Ohio EPA, Northwest District Office before they can be used.

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

2. Statement of Certification - Continuous NOx Monitoring:

a. Prior to the installation of the continuous NOx monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2 for approval by the Ohio EPA, Northwest District Office.

b. 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 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 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 and 40 CFR, Part 75.

d. The permittee shall maintain records of all data obtained by the continuous NOx monitoring system including, but not limited to, parts per million NOx, at 15% oxygen, as a 3-hour average, emissions of NOx in units established in this permit in the appropriate averaging period (i.e., lbs/hr for each hour), results of daily zero/span calibration checks, and the magnitude of manual calibration adjustments.

e. 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.

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

3. Continuous O2 Monitor:

a. Prior to the installation of the continuous O2 monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 3 for approval by the Ohio EPA, Central Office.

b. The permittee shall operate and maintain equipment to continuously monitor and record O2 from this emissions unit in units of percent O2. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13 and 40 CFR Part 75.

c. The permittee shall maintain records of all data obtained by the continuous O2 monitoring system including, but not limited to percent O2 on an instantaneous (one-minute) basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

d. A statement of certification of the continuous O2 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 40 CFR Part 75. Proof of certification shall be made available to the Director (the Ohio EPA, Northwest District Office) upon request.

e. The permittee shall maintain a written quality assurance/quality control plan for the continuous O2 monitoring system designed to ensure continuous valid and representative readings of O2 emissions. 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 O2 monitoring system must be kept on site and available for inspection during regular office hours.

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

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

5. The permittee shall maintain monthly records of the following information for emissions units P001, P002 and P003, combined:

a. the SO2 emissions, in tons, calculated as follows:

i. for natural gas usage, multiply the quantity of natural gas fired, from section A.III.7.a, by the emission factor of (lb SO2/mm cu. ft**), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the quantity of fuel oil fired, from section A.III.7.b, by the emission factor of (lb SO2/1000 gallon**), and then divide by 2000; and

iii. sum i + ii.

b. the VOC emissions, in tons, calculated as follows:

i. for natural gas usage, multiply the quantity of natural gas fired, from section A.III.7.a, by the emission factor of (lb VOC/mm cu. ft**), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the quantity of fuel oil fired, from section A.III.7.b, by the emission factor of (lb VOC/1000 gallon**), and then divide by 2000; and

iii. sum i + ii.

c. the PE, in tons, calculated as follows:

i. for natural gas usage, multiply the quantity of natural gas fired, from section A.III.7.a, by the emission factor of (lb PE/mm cu. ft**), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the quantity of fuel oil fired, from section A.III.7.b, by the emission factor of (lb PE/1000 gallon**), and then divide by 2000; and

iii. sum i + ii.

d. i. for natural gas usage, multiply the quantity of natural gas fired, from section A.III.7.a, by the emission factor of (lb formaldehyde/mm cu. ft**), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the quantity of fuel oil fired, from section A.III.7.b, by the emission factor of (lb formaldehyde/1000 gallon**), and then divide by 2000; and

iii. sum i + ii.

** emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

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

6. The permittee shall maintain monthly records of the following information for emissions units P001, P002 and P003, combined:

a. the total NOx emissions (including startup and shutdown periods), in tons (calculated by summing the hourly NOx emission rates, lbs/hr, from the NOx CEM data measurement and recording in section A.III.2., for the calendar month, and then dividing by 2000);

b. the rolling 12-month NOx emission rate, in tons;

c. the number and duration of the startup and shutdown periods;

d. the CO emissions during startup and shutdown periods, in tons [calculated by summing the hourly CO emission rates during startup and shutdowns (281 pounds per hour)*];

e. the CO emissions (excluding startup and shutdown periods), in tons, calculated as follows:

i. for natural gas usage, multiply the quantity of natural gas fired, from section A.III.7.a, by the emission factor of (lb CO/mm cu. ft**), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the quantity of fuel oil fired, from section A.III.7.b, by the emission factor of (lb CO/1000 gallon**), and then divide by 2000; and

iii. sum i + ii.

f. the total CO emissions, in tons (A.III.6.d and A.III.6.e); and

g. the rolling 12-month CO emission rate (including startup and shutdown periods), in tons.

*if a more accurate estimate (for startup/shutdown CO emissions) is developed it may be used instead of the current estimate of 281 pounds per hour factor upon approval from the Ohio EPA, Northwest District Office.

**emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

7. The permittee shall maintain monthly records of the following information for emissions units P001, P002 and P003, combined:

a. the quantity of natural gas fired, in million cubic feet;

b. the quantity of #2 fuel oil/distillate oil fired, in million gallons;

c. the cumulative fuel usage rate (as described in condition A.II.1.); and

d. the rolling 12-month summations of the natural gas usage rate, in million cubic feet, #2 oil/distillate oil usage rate, in million gallons, and the cumulative fuel usage rate, in million cubic feet.

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 NOx from this emissions unit in accordance with section A.III.2. of this permit.

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

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 information management system for this emissions unit shall be capable of monitoring and recording the fuel flow, in million cu. ft. and the number of hours of operation.

12. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify each period during which an exemption for ice-fog provided in 40 CFR 60.332(g) is in effect. 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.

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

a. all exceedances of the rolling, 12-month natural gas usage restriction of 4747.46 million cubic feet;

b. all exceedances of the rolling, 12-month # 2 fuel oil usage restriction of 18.84 million gallons;

c. all exceedances of the rolling, 12-month cumulative fuel usage restriction of 4747.46 million cubic feet;

d. all exceedances of the rolling, 12-month SO2 emission limitation of 65.3 tons;

e. all exceedances of the rolling, 12-month CO emission limitation of 192.9 tons;

f. all exceedances of the rolling, 12-month VOC emission limitation of 15.8 tons;

g. all exceedances of the rolling, 12-month NOx emission limitation of 238.7 tons; and

h. all exceedances of the rolling, 12-month PE limitation of 36.1 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 or #2 fuel oil or distillate oil 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 # 2 fuel oil 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 NOx Emissions Monitoring:

IV. Reporting Requirements (continued)

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 NOx values in excess of the hourly emission limitations of 251.4 lbs NO/hr (excluding startup and shutdown periods) and 300 lbs NOx/hr (during startup and shutdown periods) and the ppmvd NOx limitations of 25 (as a 3-hour average) (when firing natural gas, excluding startup and shutdown periods) and 42 (as a 3-hour average) (when firing fuel oil, excluding startup and shutdown periods). These reports shall also contain the total NOx 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 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.

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 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.

6. The permittee shall submit quarterly summuries that include a log of all periods of time during which the control system (water injection) was not operating, while the emmissions 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.

7. 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.

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 testing shall be performed at 100% load.

b. The emission testing shall be conducted within 3 months after issuance of this permit and annually thereafter.

c. The emission testing shall be conducted to demonstrate compliance with the NOx (lbs/hr and ppmvd limitations), CO, VOC, SO2* and PE limitations.

d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. for NOx, Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A;

ii. for PE Methods 1 - 5 of 40 CFR, Part 60, Appendix A;

iii. for SO2, Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A;

iv. for VOC, Methods 1 - 4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A; and

v. 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.

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

* In lieu of SO2 testing, the permittee may sample the sulfur content of the fuel as specified by 40 CFR, Part 60, Subpart GG. This data, in conjunction with the fuel flow, may be used to determine the SO2 emissions (lbs/hr).

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).

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.

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

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

V. Testing Requirements (continued)

2.a Emission Limitations:
251.4 lbs NOx/hr, 25 ppm NOx at 15% oxygen (as a 3-hour average), when firing natural gas, excluding startup/shutdown periods

42 ppm NOx at 15% oxygen (as a 3-hour average), when firing #2 oil, excluding startup/shutdown periods

Applicable Compliance Method:
Compliance with the allowable NOx emission limitations above shall be based on the results of emission testing conducted in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

Compliance shall also be based on the record keeping requirements established in section A.III of this permit.

2.b Emission Limitations:
38.0 lbs PE/hr
71.0 lbs SO2/hr
40.0 lbs CO/hr, excluding startup/shutdown periods
17.2 lbs VOC/hr

Applicable Compliance Method:
Compliance with the hourly allowable PE limitation shall be based on the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5.

Compliance with the hourly allowable SO2 emission limitation shall be based on the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 6.

Compliance with the hourly allowable CO emission limitation shall be based on the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 10.

Compliance with the hourly allowable VOC emission limitation shall be based on the results of emission testing conducted in accordance Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.

2.c Emission Limitations:
1.0 lb formaldehyde/hr, 1.7 tons formaldehyde/rolling, 12-month summation

Applicable Compliance Method:
Compliance with the hourly allowable formaldehyde emission limitation may be determined by multiplying an emission factor of 0.00071 lb formaldehyde/mmBtu of actual heat input [from AP-42, Table 3.1-3 (revised 4/00)] by the emissions unit's maximum heat input rate (1431 mmBtu/hr).

The permittee shall demonstrate compliance with the annual allowable emission limitation pursuant to the record keeping requirements established in section A.III of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable formaldehyde emission limitation by testing in accordance with Methods 1 - 4 and 0011 of 40 CFR, Part 60, Appendix A.

2.d Emission Limitations:
Visible PE from any stack shall not exceed 10% opacity, as a 6-minute average, when burring natural gas.

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule, when firing # 2 fuel oil.

Applicable Compliance Method: If required, compliance with the visible PE limitations above shall be determined by Method 9, 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

2.e Emission Limitations:
281 lbs CO/hr (during startup/shutdown periods)

300 lbs NOx/hr (during startup/shutdown periods)

Applicable Compliance Method: The hourly emission limitations above represent the maximum hourly emissions for NOx and CO (during startup and shutdown periods), as provided by the manufacturer for CO.

Compliance with the hourly NOx emission limitation above may be demonstrated by the record keeping and monitoring requirements established in section A.III of this permit

If required, compliance with the hourly NOx emission limitation above shall be demonstrated in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

If required, compliance with the hourly CO emission limitation above shall be demonstrated in accordance with Methods 1 - 4 and 10 of 40 CFR, Part 60, Appendix A.

2.f Emission Limitations:
36.1 tons PE/rolling, 12-month summation
65.3 tons SO2/rolling 12-month summation
15.8 tons VOC/rolling, 12-month summation
192.9 tons CO/rolling, 12-month summation,
120.0 tons NOx/rolling, 12-month summation

Applicable Compliance Method:
The permittee shall demonstrate compliance with the annual allowable PE, SO2, CO, NOx and VOC emission limitations pursuant to the record keeping requirements established in section A.III 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
1431 mmBtu/hr (130 MW), natural gas-fired simple cycle turbine generator, with #2 fuel oil/distillate oil backup with water injection NOx reduction system (peaker #4)	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 (P001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions uni'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 SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of 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): 272.69

Maximum Hourly Emission Rate (lbs/hr): 0.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.2380

MAGLC (ug/m3): 6.49

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 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.).

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(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

3. 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: Peaker No. 5 (P002)

Activity Description: Natural gas-fired combustion turbine with option to burn No. 2 oil.

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
1431 mmBtu/hr (130 MW), natural gas-fired simple cycle turbine generator, with #2 fuel oil/distillate oil backup with water injection NOx reduction system (peaker #5)	OAC rule 3745-31-05(A)(3) (PTI #03-13247)	38.0 lbs of particulate emissions (PE)/hr 251.4 lbs nitrogen oxides (NOx)/hr, excluding startup/shutdown periods 300 lbs NOx/hr (during startup/shutdown periods) NOx emissions shall not exceed 25 ppmvd at 15% oxygen (as a 3-hour average), when firing natural gas, excluding startup/shutdown periods. NOx emissions shall not exceed 42 ppmvd NOx at 15% oxygen (as a 3-hour average), when firing #2 fuel oil/distillate oil, excluding startup/shutdown periods. 71.0 lbs sulfur dioxide (SO2)/hr 40.0 lbs carbon monoxide (CO)/hr, excluding startup/shutdown periods 281 lbs CO/hr (during startup/shutdown periods) 17.2 lbs volatile organic compounds (VOC)/hr 1.0 lb formaldehyde/hr Visible PE from any stack shall not exceed 10% opacity, as a 6-minute average, when firing natural gas.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
		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.
	OAC rule 3745-31-05(D) (PTI #03-13247)	65.3 tons SO2/rolling, 12-month summation (for emissions units P001, P002 and P003, combined) 192.9 tons CO/rolling, 12-month summation (for emissions units P001, P002 and P003, combined)(See A.I.2.d.) 15.8 tons VOC/rolling, 12-month summation (for emissions units P001, P002 and P003, combined) 238.7 tons NOx/rolling, 12-month summation (for emissions units P001, P002 and P003, combined) (See A.I.2.d.) 36.1 tons PE/rolling, 12-month summation (for emissions units P001, P002 and P003, combined) 1.7 tons formaldehyde/rolling, 12-month summation (for emissions units P001, P002 and P003, combined)
	OAC rule 3745-18-06(F)	See A.I.2.c.
	OAC rule 3745-17-11(B)(4)	See A.I.2.c.
	OAC rule 3745-17-07(A)	When firing #2 fuel oil/distillate oil, visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule. When firing natural gas, see A.I.2.c.
	40 CFR, Part 60, Subpart GG	See A.I.2.c.
	40 CFR, Part 75	See Part I, term and condition A.4.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.f.

2. Additional Terms and Conditions

2.a The hourly allowable emission limitations of 300 lbs NOx/hr (during startup and shutdown periods) and 281 lbs CO/hr (during startup and shutdown periods) were established for PTI purposes 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 The maximum heat input rate of this emissions unit is 1431 mmBtu/hr, when firing natural gas, and 1413 mmBtu/hr, when firing #2 fuel oil. These values correspond to a #2 fuel oil flow of 10,240 gallons/hr and a natural gas flow of 1.43 million cubic feet/hr. The facility's information management system shall be capable of monitoring and recording these fuel flows for this emissions unit. This emissions unit shall operate within 5% of these fuel flows, when firing #2 fuel oil/distillate oil, except for startup (not to exceed 45 minutes in duration) and shutdown (not to exceed 45 minutes in duration).

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 annual NOx and CO emissions include startup/shutdown emissions (at an estimated worst case rate of 300 startups/shutdowns annually, per turbine).

2.e Best available technology (BAT) for this emissions unit shall be the use of natural gas and # 2 fuel oil for fuel and the use of water injection to control NOx emissions.

2.f 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 03-13247.

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.

II. Operational Restrictions

1. The maximum annual fuel usage for emissions units P001, P002 and P003, combined, shall not exceed any of the following:

a. 4747.46 mm cu. ft of natural gas per rolling, 12-month period;

b. 18.84 million gallons of #2 fuel oil/distillate oil per rolling, 12-month period; and

c. 4747.46 million cubic feet of cumulative fuel usage, where:

1.0 million cubic feet of natural gas = 1.0 million cubic feet of cumulative fuel usage

1.0 million gallons of #2 oil/distillate oil = 252.0 million cubic feet of cumulative fuel usage

2. The permittee shall burn only #2 fuel oil, distillate oil and/or natural gas in this emissions unit.

3. The sulfur content of the # 2 fuel oil 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).

4. The permittee shall operate and maintain a water injection system for the control of NOx emissions from this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor the sulfur content of the fuel oil being fired in the turbine. The frequency of the monitoring shall be determined as follows:

a. If the turbine is supplied its fuel oil from a bulk storage tank, the values shall be determined on each occasion that fuel oil is transferred to the storage tank from any other source.

b. If the turbine is supplied its fuel oil without intermediate bulk storage the values shall be determined and recorded daily. The permittee or fuel oil vendor may develop custom fuel oil schedules for the determination of the values based on the design and operation of the affected facility and the characteristics of the fuel oil supply. These custom schedules shall be substantiated with data and must be approved by the Ohio EPA, Northwest District Office before they can be used.

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

2. Statement of Certification - Continuous NOx Monitoring:

a. Prior to the installation of the continuous NOx monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2 for approval by the Ohio EPA, Northwest District Office.

b. 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 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 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 and 40 CFR, Part 75.

d. The permittee shall maintain records of all data obtained by the continuous NOx monitoring system including, but not limited to, parts per million NOx, at 15% oxygen, as a 3-hour average, emissions of NOx in units established in this permit in the appropriate averaging period (i.e., lbs/hr for each hour), results of daily zero/span calibration checks, and the magnitude of manual calibration adjustments.

e. 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.

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

3. Continuous O2 Monitor:

a. Prior to the installation of the continuous O2 monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 3 for approval by the Ohio EPA, Central Office.

b. The permittee shall operate and maintain equipment to continuously monitor and record O2 from this emissions unit in units of percent O2. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13 and 40 CFR Part 75.

c. The permittee shall maintain records of all data obtained by the continuous O2 monitoring system including, but not limited to percent O2 on an instantaneous (one-minute) basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

d. A statement of certification of the continuous O2 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 40 CFR Part 75. Proof of certification shall be made available to the Director (the Ohio EPA, Northwest District Office) upon request.

e. The permittee shall maintain a written quality assurance/quality control plan for the continuous O2 monitoring system designed to ensure continuous valid and representative readings of O2 emissions. 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 O2 monitoring system must be kept on site and available for inspection during regular office hours.

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

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

5. The permittee shall maintain monthly records of the following information for emissions units P001, P002 and P003, combined:

a. the SO2 emissions, in tons, calculated as follows:

i. for natural gas usage, multiply the quantity of natural gas fired, from section A.III.7.a, by the emission factor of (lb SO2/mm cu. ft**), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the quantity of fuel oil fired, from section A.III.7.b, by the emission factor of (lb SO2/1000 gallon**), and then divide by 2000; and

iii. sum i + ii.

b. the VOC emissions, in tons, calculated as follows:

i. for natural gas usage, multiply the quantity of natural gas fired, from section A.III.7.a, by the emission factor of (lb VOC/mm cu. ft**), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the quantity of fuel oil fired, from section A.III.7.b, by the emission factor of (lb VOC/1000 gallon**), and then divide by 2000; and

iii. sum i + ii.

c. the PE, in tons, calculated as follows:

i. for natural gas usage, multiply the quantity of natural gas fired, from section A.III.7.a, by the emission factor of (lb PE/mm cu. ft**), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the quantity of fuel oil fired, from section A.III.7.b, by the emission factor of (lb PE/1000 gallon**), and then divide by 2000; and

iii. sum i + ii.

d. i. for natural gas usage, multiply the quantity of natural gas fired, from section A.III.7.a, by the emission factor of (lb formaldehyde/mm cu. ft**), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the quantity of fuel oil fired, from section A.III.7.b, by the emission factor of (lb formaldehyde/1000 gallon**), and then divide by 2000; and

iii. sum i + ii.

** emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

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

6. The permittee shall maintain monthly records of the following information for emissions units P001, P002 and P003, combined:

a. the total NOx emissions (including startup and shutdown periods), in tons (calculated by summing the hourly NOx emission rates, lbs/hr, from the NOx CEM data measurement and recording in section A.III.2., for the calendar month, and then dividing by 2000);

b. the rolling 12-month NOx emission rate, in tons;

c. the number and duration of the startup and shutdown periods;

d. the CO emissions during startup and shutdown periods, in tons [calculated by summing the hourly CO emission rates during startup and shutdowns (281 pounds per hour)*];

e. the CO emissions (excluding startup and shutdown periods), in tons, calculated as follows:

i. for natural gas usage, multiply the quantity of natural gas fired, from section A.III.7.a, by the emission factor of (lb CO/mm cu. ft**), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the quantity of fuel oil fired, from section A.III.7.b, by the emission factor of (lb CO/1000 gallon**), and then divide by 2000; and

iii. sum i + ii.

f. the total CO emissions, in tons (A.III.6.d and A.III.6.e); and

g. the rolling 12-month CO emission rate (including startup and shutdown periods), in tons.

*if a more accurate estimate (for startup/shutdown CO emissions) is developed it may be used instead of the current estimate of 281 pounds per hour factor upon approval from the Ohio EPA, Northwest District Office.

**emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

7. The permittee shall maintain monthly records of the following information for emissions units P001, P002 and P003, combined:

a. the quantity of natural gas fired, in million cubic feet;

b. the quantity of #2 fuel oil/distillate oil fired, in million gallons;

c. the cumulative fuel usage rate (as described in condition A.II.1.); and

d. the rolling 12-month summations of the natural gas usage rate, in million cubic feet, #2 oil/distillate oil usage rate, in million gallons, and the cumulative fuel usage rate, in million cubic feet.

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 NOx from this emissions unit in accordance with section A.III.2. of this permit.

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

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 information management system for this emissions unit shall be capable of monitoring and recording the fuel flow, in million cu. ft. and the number of hours of operation.

12. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify each period during which an exemption for ice-fog provided in 40 CFR 60.332(g) is in effect. 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.

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

a. all exceedances of the rolling, 12-month natural gas usage restriction of 4747.46 million cubic feet;

b. all exceedances of the rolling, 12-month # 2 fuel oil usage restriction of 18.84 million gallons;

c. all exceedances of the rolling, 12-month cumulative fuel usage restriction of 4747.46 million cubic feet;

d. all exceedances of the rolling, 12-month SO2 emission limitation of 65.3 tons;

e. all exceedances of the rolling, 12-month CO emission limitation of 192.9 tons;

f. all exceedances of the rolling, 12-month VOC emission limitation of 15.8 tons;

g. all exceedances of the rolling, 12-month NOx emission limitation of 238.7 tons; and

h. all exceedances of the rolling, 12-month PE limitation of 36.1 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 or #2 fuel oil or distillate oil 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 # 2 fuel oil 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 NOx Emissions Monitoring:

IV. Reporting Requirements (continued)

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 NOx values in excess of the hourly emission limitations of 251.4 lbs NO/hr (excluding startup and shutdown periods) and 300 lbs NOx/hr (during startup and shutdown periods) and the ppmvd NOx limitations of 25 (as a 3-hour average) (when firing natural gas, excluding startup and shutdown periods) and 42 (as a 3-hour average) (when firing fuel oil, excluding startup and shutdown periods). These reports shall also contain the total NOx 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 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.

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 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.

6. The permittee shall submit quarterly summuries that include a log of all periods of time during which the control system (water injection) was not operating, while the emmissions 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.

7. 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.

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 testing shall be performed at 100% load.

b. The emission testing shall be conducted within 3 months after issuance of this permit and annually thereafter.

c. The emission testing shall be conducted to demonstrate compliance with the NOx (lbs/hr and ppmvd limitations), CO, VOC, SO2* and PE limitations.

d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. for NOx, Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A;

ii. for PE Methods 1 - 5 of 40 CFR, Part 60, Appendix A;

iii. for SO2, Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A;

iv. for VOC, Methods 1 - 4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A; and

v. 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.

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

* In lieu of SO2 testing, the permittee may sample the sulfur content of the fuel as specified by 40 CFR, Part 60, Subpart GG. This data, in conjunction with the fuel flow, may be used to determine the SO2 emissions (lbs/hr).

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).

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.

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

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

V. Testing Requirements (continued)

2.a Emission Limitations:
251.4 lbs NOx/hr, 25 ppm NOx at 15% oxygen (as a 3-hour average), when firing natural gas, excluding startup/shutdown periods

42 ppm NOx at 15% oxygen (as a 3-hour average), when firing #2 oil, excluding startup/shutdown periods

Applicable Compliance Method:
Compliance with the allowable NOx emission limitations above shall be based on the results of emission testing conducted in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

Compliance shall also be based on the record keeping requirements established in section A.III of this permit.

2.b Emission Limitations:
38.0 lbs PE/hr
71.0 lbs SO2/hr
40.0 lbs CO/hr, excluding startup/shutdown periods
17.2 lbs VOC/hr

Applicable Compliance Method:
Compliance with the hourly allowable PE limitation shall be based on the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5.

Compliance with the hourly allowable SO2 emission limitation shall be based on the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 6.

Compliance with the hourly allowable CO emission limitation shall be based on the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 10.

Compliance with the hourly allowable VOC emission limitation shall be based on the results of emission testing conducted in accordance Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.

2.c Emission Limitations:
1.0 lb formaldehyde/hr, 1.7 tons formaldehyde/rolling, 12-month summation

Applicable Compliance Method:
Compliance with the hourly allowable formaldehyde emission limitation may be determined by multiplying an emission factor of 0.00071 lb formaldehyde/mmBtu of actual heat input [from AP-42, Table 3.1-3 (revised 4/00)] by the emissions unit's maximum heat input rate (1431 mmBtu/hr).

The permittee shall demonstrate compliance with the annual allowable emission limitation pursuant to the record keeping requirements established in section A.III of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable formaldehyde emission limitation by testing in accordance with Methods 1 - 4 and 0011 of 40 CFR, Part 60, Appendix A.

2.d Emission Limitations:
Visible PE from any stack shall not exceed 10% opacity, as a 6-minute average, when burring natural gas.

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule, when firing # 2 fuel oil.

Applicable Compliance Method: If required, compliance with the visible PE limitations above shall be determined by Method 9, 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

2.e Emission Limitations:
281 lbs CO/hr (during startup/shutdown periods)

300 lbs NOx/hr (during startup/shutdown periods)

Applicable Compliance Method: The hourly emission limitations above represent the maximum hourly emissions for NOx and CO (during startup and shutdown periods), as provided by the manufacturer for CO.

Compliance with the hourly NOx emission limitation above may be demonstrated by the record keeping and monitoring requirements established in section A.III of this permit

If required, compliance with the hourly NOx emission limitation above shall be demonstrated in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

If required, compliance with the hourly CO emission limitation above shall be demonstrated in accordance with Methods 1 - 4 and 10 of 40 CFR, Part 60, Appendix A.

2.f Emission Limitations:
36.1 tons PE/rolling, 12-month summation
65.3 tons SO2/rolling 12-month summation
15.8 tons VOC/rolling, 12-month summation
192.9 tons CO/rolling, 12-month summation,
120.0 tons NOx/rolling, 12-month summation

Applicable Compliance Method:
The permittee shall demonstrate compliance with the annual allowable PE, SO2, CO, NOx and VOC emission limitations pursuant to the record keeping requirements established in section A.III 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
1431 mmBtu/hr (130 MW), natural gas-fired simple cycle turbine generator, with #2 fuel oil/distillate oil backup with water injection NOx reduction system (peaker #5)	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 (P001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions uni'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 SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of 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): 272.69

Maximum Hourly Emission Rate (lbs/hr): 0.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.2380

MAGLC (ug/m3): 6.49

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 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.).

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(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

3. 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: Peaker No. 6 (P003)

Activity Description: Natural gas-fired combustion turbine with option to burn No. 2 oil.

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
1431 mmBtu/hr (130 MW), natural gas-fired simple cycle turbine generator, with #2 fuel oil/distillate oil backup with water injection NOx reduction system (peaker #6)	OAC rule 3745-31-05(A)(3) (PTI #03-13247)	38.0 lbs of particulate emissions (PE)/hr 251.4 lbs nitrogen oxides (NOx)/hr, excluding startup/shutdown periods 300 lbs NOx/hr (during startup/shutdown periods) NOx emissions shall not exceed 25 ppmvd at 15% oxygen (as a 3-hour average), when firing natural gas, excluding startup/shutdown periods. NOx emissions shall not exceed 42 ppmvd NOx at 15% oxygen (as a 3-hour average), when firing #2 fuel oil/distillate oil, excluding startup/shutdown periods. 71.0 lbs sulfur dioxide (SO2)/hr 40.0 lbs carbon monoxide (CO)/hr, excluding startup/shutdown periods 281 lbs CO/hr (during startup/shutdown periods) 17.2 lbs volatile organic compounds (VOC)/hr 1.0 lb formaldehyde/hr Visible PE from any stack shall not exceed 10% opacity, as a 6-minute average, when firing natural gas.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
		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.
	OAC rule 3745-31-05(D) (PTI #03-13247)	65.3 tons SO2/rolling, 12-month summation (for emissions units P001, P002 and P003, combined) 192.9 tons CO/rolling, 12-month summation (for emissions units P001, P002 and P003, combined)(See A.I.2.d.) 15.8 tons VOC/rolling, 12-month summation (for emissions units P001, P002 and P003, combined) 238.7 tons NOx/rolling, 12-month summation (for emissions units P001, P002 and P003, combined) (See A.I.2.d.) 36.1 tons PE/rolling, 12-month summation (for emissions units P001, P002 and P003, combined) 1.7 tons formaldehyde/rolling, 12-month summation (for emissions units P001, P002 and P003, combined)
	OAC rule 3745-18-06(F)	See A.I.2.c.
	OAC rule 3745-17-11(B)(4)	See A.I.2.c.
	OAC rule 3745-17-07(A)	When firing #2 fuel oil/distillate oil, visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule. When firing natural gas, see A.I.2.c.
	40 CFR, Part 60, Subpart GG	See A.I.2.c.
	40 CFR, Part 75	See Part I, term and condition A.4.
	OAC rules 3745-21-08(B) and 3745-23-06(B)	See A.I.2.f.

2. Additional Terms and Conditions

2.a The hourly allowable emission limitations of 300 lbs NOx/hr (during startup and shutdown periods) and 281 lbs CO/hr (during startup and shutdown periods) were established for PTI purposes 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 The maximum heat input rate of this emissions unit is 1431 mmBtu/hr, when firing natural gas, and 1413 mmBtu/hr, when firing #2 fuel oil. These values correspond to a #2 fuel oil flow of 10,240 gallons/hr and a natural gas flow of 1.43 million cubic feet/hr. The facility's information management system shall be capable of monitoring and recording these fuel flows for this emissions unit. This emissions unit shall operate within 5% of these fuel flows, when firing #2 fuel oil/distillate oil, except for startup (not to exceed 45 minutes in duration) and shutdown (not to exceed 45 minutes in duration).

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 annual NOx and CO emissions include startup/shutdown emissions (at an estimated worst case rate of 300 startups/shutdowns annually, per turbine).

2.e Best available technology (BAT) for this emissions unit shall be the use of natural gas and # 2 fuel oil for fuel and the use of water injection to control NOx emissions.

2.f 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 03-13247.

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.

II. Operational Restrictions

1. The maximum annual fuel usage for emissions units P001, P002 and P003, combined, shall not exceed any of the following:

a. 4747.46 mm cu. ft of natural gas per rolling, 12-month period;

b. 18.84 million gallons of #2 fuel oil/distillate oil per rolling, 12-month period; and

c. 4747.46 million cubic feet of cumulative fuel usage, where:

1.0 million cubic feet of natural gas = 1.0 million cubic feet of cumulative fuel usage

1.0 million gallons of #2 oil/distillate oil = 252.0 million cubic feet of cumulative fuel usage

2. The permittee shall burn only #2 fuel oil, distillate oil and/or natural gas in this emissions unit.

3. The sulfur content of the # 2 fuel oil 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).

4. The permittee shall operate and maintain a water injection system for the control of NOx emissions from this emissions unit.

III. Monitoring and/or Record Keeping Requirements

1. The permittee shall monitor the sulfur content of the fuel oil being fired in the turbine. The frequency of the monitoring shall be determined as follows:

a. If the turbine is supplied its fuel oil from a bulk storage tank, the values shall be determined on each occasion that fuel oil is transferred to the storage tank from any other source.

b. If the turbine is supplied its fuel oil without intermediate bulk storage the values shall be determined and recorded daily. The permittee or fuel oil vendor may develop custom fuel oil schedules for the determination of the values based on the design and operation of the affected facility and the characteristics of the fuel oil supply. These custom schedules shall be substantiated with data and must be approved by the Ohio EPA, Northwest District Office before they can be used.

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

2. Statement of Certification - Continuous NOx Monitoring:

a. Prior to the installation of the continuous NOx monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 2 for approval by the Ohio EPA, Northwest District Office.

b. 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 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 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 and 40 CFR, Part 75.

d. The permittee shall maintain records of all data obtained by the continuous NOx monitoring system including, but not limited to, parts per million NOx, at 15% oxygen, as a 3-hour average, emissions of NOx in units established in this permit in the appropriate averaging period (i.e., lbs/hr for each hour), results of daily zero/span calibration checks, and the magnitude of manual calibration adjustments.

e. 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.

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

3. Continuous O2 Monitor:

a. Prior to the installation of the continuous O2 monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 3 for approval by the Ohio EPA, Central Office.

b. The permittee shall operate and maintain equipment to continuously monitor and record O2 from this emissions unit in units of percent O2. Such continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.13 and 40 CFR Part 75.

c. The permittee shall maintain records of all data obtained by the continuous O2 monitoring system including, but not limited to percent O2 on an instantaneous (one-minute) basis, results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

d. A statement of certification of the continuous O2 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 40 CFR Part 75. Proof of certification shall be made available to the Director (the Ohio EPA, Northwest District Office) upon request.

e. The permittee shall maintain a written quality assurance/quality control plan for the continuous O2 monitoring system designed to ensure continuous valid and representative readings of O2 emissions. 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 O2 monitoring system must be kept on site and available for inspection during regular office hours.

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

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

5. The permittee shall maintain monthly records of the following information for emissions units P001, P002 and P003, combined:

a. the SO2 emissions, in tons, calculated as follows:

i. for natural gas usage, multiply the quantity of natural gas fired, from section A.III.7.a, by the emission factor of (lb SO2/mm cu. ft**), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the quantity of fuel oil fired, from section A.III.7.b, by the emission factor of (lb SO2/1000 gallon**), and then divide by 2000; and

iii. sum i + ii.

b. the VOC emissions, in tons, calculated as follows:

i. for natural gas usage, multiply the quantity of natural gas fired, from section A.III.7.a, by the emission factor of (lb VOC/mm cu. ft**), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the quantity of fuel oil fired, from section A.III.7.b, by the emission factor of (lb VOC/1000 gallon**), and then divide by 2000; and

iii. sum i + ii.

c. the PE, in tons, calculated as follows:

i. for natural gas usage, multiply the quantity of natural gas fired, from section A.III.7.a, by the emission factor of (lb PE/mm cu. ft**), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the quantity of fuel oil fired, from section A.III.7.b, by the emission factor of (lb PE/1000 gallon**), and then divide by 2000; and

iii. sum i + ii.

d. i. for natural gas usage, multiply the quantity of natural gas fired, from section A.III.7.a, by the emission factor of (lb formaldehyde/mm cu. ft**), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the quantity of fuel oil fired, from section A.III.7.b, by the emission factor of (lb formaldehyde/1000 gallon**), and then divide by 2000; and

iii. sum i + ii.

** emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

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

6. The permittee shall maintain monthly records of the following information for emissions units P001, P002 and P003, combined:

a. the total NOx emissions (including startup and shutdown periods), in tons (calculated by summing the hourly NOx emission rates, lbs/hr, from the NOx CEM data measurement and recording in section A.III.2., for the calendar month, and then dividing by 2000);

b. the rolling 12-month NOx emission rate, in tons;

c. the number and duration of the startup and shutdown periods;

d. the CO emissions during startup and shutdown periods, in tons [calculated by summing the hourly CO emission rates during startup and shutdowns (281 pounds per hour)*];

e. the CO emissions (excluding startup and shutdown periods), in tons, calculated as follows:

i. for natural gas usage, multiply the quantity of natural gas fired, from section A.III.7.a, by the emission factor of (lb CO/mm cu. ft**), and then divide by 2000;

ii. for #2 fuel oil/distillate oil usage, multiply the quantity of fuel oil fired, from section A.III.7.b, by the emission factor of (lb CO/1000 gallon**), and then divide by 2000; and

iii. sum i + ii.

f. the total CO emissions, in tons (A.III.6.d and A.III.6.e); and

g. the rolling 12-month CO emission rate (including startup and shutdown periods), in tons.

*if a more accurate estimate (for startup/shutdown CO emissions) is developed it may be used instead of the current estimate of 281 pounds per hour factor upon approval from the Ohio EPA, Northwest District Office.

**emission factor derived from the results of the most recent emission testing (conducted in accordance with section A.V.1 of this permit) that demonstrated the emissions unit was in compliance.

7. The permittee shall maintain monthly records of the following information for emissions units P001, P002 and P003, combined:

a. the quantity of natural gas fired, in million cubic feet;

b. the quantity of #2 fuel oil/distillate oil fired, in million gallons;

c. the cumulative fuel usage rate (as described in condition A.II.1.); and

d. the rolling 12-month summations of the natural gas usage rate, in million cubic feet, #2 oil/distillate oil usage rate, in million gallons, and the cumulative fuel usage rate, in million cubic feet.

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 NOx from this emissions unit in accordance with section A.III.2. of this permit.

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

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 information management system for this emissions unit shall be capable of monitoring and recording the fuel flow, in million cu. ft. and the number of hours of operation.

12. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/mmBtu). (The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.

The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit.

IV. Reporting Requirements

1. The permittee shall submit quarterly reports that identify each period during which an exemption for ice-fog provided in 40 CFR 60.332(g) is in effect. 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.

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

a. all exceedances of the rolling, 12-month natural gas usage restriction of 4747.46 million cubic feet;

b. all exceedances of the rolling, 12-month # 2 fuel oil usage restriction of 18.84 million gallons;

c. all exceedances of the rolling, 12-month cumulative fuel usage restriction of 4747.46 million cubic feet;

d. all exceedances of the rolling, 12-month SO2 emission limitation of 65.3 tons;

e. all exceedances of the rolling, 12-month CO emission limitation of 192.9 tons;

f. all exceedances of the rolling, 12-month VOC emission limitation of 15.8 tons;

g. all exceedances of the rolling, 12-month NOx emission limitation of 238.7 tons; and

h. all exceedances of the rolling, 12-month PE limitation of 36.1 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 or #2 fuel oil or distillate oil 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 # 2 fuel oil 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 NOx Emissions Monitoring:

IV. Reporting Requirements (continued)

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 NOx values in excess of the hourly emission limitations of 251.4 lbs NO/hr (excluding startup and shutdown periods) and 300 lbs NOx/hr (during startup and shutdown periods) and the ppmvd NOx limitations of 25 (as a 3-hour average) (when firing natural gas, excluding startup and shutdown periods) and 42 (as a 3-hour average) (when firing fuel oil, excluding startup and shutdown periods). These reports shall also contain the total NOx 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 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.

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 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.

6. The permittee shall submit quarterly summuries that include a log of all periods of time during which the control system (water injection) was not operating, while the emmissions 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.

7. 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.

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 testing shall be performed at 100% load.

b. The emission testing shall be conducted within 3 months after issuance of this permit and annually thereafter.

c. The emission testing shall be conducted to demonstrate compliance with the NOx (lbs/hr and ppmvd limitations), CO, VOC, SO2* and PE limitations.

d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

i. for NOx, Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A;

ii. for PE Methods 1 - 5 of 40 CFR, Part 60, Appendix A;

iii. for SO2, Methods 1 - 4 and 6 of 40 CFR, Part 60, Appendix A;

iv. for VOC, Methods 1 - 4 and 18, 25 or 25A of 40 CFR, Part 60, Appendix A; and

v. 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.

e. The test(s) shall be conducted while the emissions unit is operating at or near its maximum capacity, unless otherwise specified or approved by the Ohio EPA, Northwest District Office.

* In lieu of SO2 testing, the permittee may sample the sulfur content of the fuel as specified by 40 CFR, Part 60, Subpart GG. This data, in conjunction with the fuel flow, may be used to determine the SO2 emissions (lbs/hr).

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).

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.

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

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

V. Testing Requirements (continued)

2.a Emission Limitations:
251.4 lbs NOx/hr, 25 ppm NOx at 15% oxygen (as a 3-hour average), when firing natural gas, excluding startup/shutdown periods

42 ppm NOx at 15% oxygen (as a 3-hour average), when firing #2 oil, excluding startup/shutdown periods

Applicable Compliance Method:
Compliance with the allowable NOx emission limitations above shall be based on the results of emission testing conducted in accordance with Methods 1-4 and 7 of 40 CFR, Part 60, Appendix A.

Compliance shall also be based on the record keeping requirements established in section A.III of this permit.

2.b Emission Limitations:
38.0 lbs PE/hr
71.0 lbs SO2/hr
40.0 lbs CO/hr, excluding startup/shutdown periods
17.2 lbs VOC/hr

Applicable Compliance Method:
Compliance with the hourly allowable PE limitation shall be based on the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 5.

Compliance with the hourly allowable SO2 emission limitation shall be based on the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 6.

Compliance with the hourly allowable CO emission limitation shall be based on the results of emission testing conducted in accordance with 40 CFR, Part 60, Appendix A, Methods 1 - 4 and 10.

Compliance with the hourly allowable VOC emission limitation shall be based on the results of emission testing conducted in accordance Methods 18, 25, or 25A, of 40 CFR, Part 60, Appendix A.

2.c Emission Limitations:
1.0 lb formaldehyde/hr, 1.7 tons formaldehyde/rolling, 12-month summation

Applicable Compliance Method:
Compliance with the hourly allowable formaldehyde emission limitation may be determined by multiplying an emission factor of 0.00071 lb formaldehyde/mmBtu of actual heat input [from AP-42, Table 3.1-3 (revised 4/00)] by the emissions unit's maximum heat input rate (1431 mmBtu/hr).

The permittee shall demonstrate compliance with the annual allowable emission limitation pursuant to the record keeping requirements established in section A.III of this permit.

If required, the permittee shall demonstrate compliance with the hourly allowable formaldehyde emission limitation by testing in accordance with Methods 1 - 4 and 0011 of 40 CFR, Part 60, Appendix A.

2.d Emission Limitations:
Visible PE from any stack shall not exceed 10% opacity, as a 6-minute average, when burring natural gas.

Visible PE from any stack shall not exceed 20% opacity, as a 6-minute average, except as provided by rule, when firing # 2 fuel oil.

Applicable Compliance Method: If required, compliance with the visible PE limitations above shall be determined by Method 9, 40 CFR, Part 60, Appendix A.

V. Testing Requirements (continued)

2.e Emission Limitations:
281 lbs CO/hr (during startup/shutdown periods)

300 lbs NOx/hr (during startup/shutdown periods)

Applicable Compliance Method: The hourly emission limitations above represent the maximum hourly emissions for NOx and CO (during startup and shutdown periods), as provided by the manufacturer for CO.

Compliance with the hourly NOx emission limitation above may be demonstrated by the record keeping and monitoring requirements established in section A.III of this permit

If required, compliance with the hourly NOx emission limitation above shall be demonstrated in accordance with Methods 1 - 4 and 7 of 40 CFR, Part 60, Appendix A.

If required, compliance with the hourly CO emission limitation above shall be demonstrated in accordance with Methods 1 - 4 and 10 of 40 CFR, Part 60, Appendix A.

2.f Emission Limitations:
36.1 tons PE/rolling, 12-month summation
65.3 tons SO2/rolling 12-month summation
15.8 tons VOC/rolling, 12-month summation
192.9 tons CO/rolling, 12-month summation,
120.0 tons NOx/rolling, 12-month summation

Applicable Compliance Method:
The permittee shall demonstrate compliance with the annual allowable PE, SO2, CO, NOx and VOC emission limitations pursuant to the record keeping requirements established in section A.III 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.

Operations, Property, and/or Equipment	Applicable Rules/ Requirements	Applicable Emissions Limitations/Control Measures
1431 mmBtu/hr (130 MW), natural gas-fired simple cycle turbine generator, with #2 fuel oil/distillate oil backup with water injection NOx reduction system (peaker #6)	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 (P001) was evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions uni'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 SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of 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): 272.69

Maximum Hourly Emission Rate (lbs/hr): 0.93

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 0.2380

MAGLC (ug/m3): 6.49

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 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.).

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(VV)(1)(a)(ii), and a modification of the existing Permit to Install will not be required. If the change(s) is (are) defined as a modification under other provisions of the modification definition [other than (VV)(1)(a)(ii)], then the permittee shall obtain a final permit to install prior to the change.

3. 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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