



COLUMBUS | CLEVELAND  
CINCINNATI-DAYTON  
MARIETTA

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**Sally W. Bloomfield**  
614.227.2368  
sbloomfield@bricker.com

November 14, 2014

*Via Electronic Filing*

Ms. Barcy McNeal  
Administration/Docketing  
Public Utilities Commission of Ohio  
180 East Broad Street, 11<sup>th</sup> Floor  
Columbus, OH 43215-3793

**Re: Oregon Clean Energy, LLC  
Case No. 12-2959-EL-BGN**

Dear Ms. McNeal:

The May 1, 2013 Opinion, Order, and Certificate approving Oregon Clean Energy, LLC's ("Oregon") Certificate of Environmental Compatibility and Public Need to Construct an Electric Generation Facility ("Certificate") and the March 15, 2013 Second Supplement to Application established a set of conditions and supplemental commitments as part of the Certificate.

Specifically, in part, **Commitment #20**, which included in the Second Supplement filed on March 15, 2013, requires that:

**Prior to the commencement of construction activities that require permits or authorizations by federal or state laws and regulations, the Applicant will obtain and comply with such permits or authorizations. The Applicant will provide copies of permits and authorizations, including all supporting documentation, to Staff within seven days of issuance or receipt by the Applicant. The Applicant will provide a schedule of construction activities and acquisition of corresponding permits for each activity at the preconstruction conference.**

Attached is a copy of the Ohio EPA Stormwater Permit dated October 3, 2014, and the Ohio EPA final Division of Air Pollution Control Permit-to-Install issued June 18, 2013.

If you have any questions please call at the number listed above.

Sincerely,

Sally W. Bloomfield

Attachments

Cc: Grant Zeto (w/Attachments)  
Chris Cunningham (w/Attachments)



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

October 03, 2014

BVC  
TOM MAQDANZ  
816 N LALLENDORF RD  
OREGON OH 43616

Re: Approval Under Ohio EPA National Pollutant Discharge Elimination System (NPDES) Construction Site Storm Water General Permit OHC000004 (the permit)

Dear Applicant:

Your NPDES Notice of Intent (NOI) application is approved for the following facility/site. Please use your Ohio EPA Facility Permit Number in all future correspondence.

**Facility Name:** OREGON CLEAN ENERGY CENTER  
**Facility Location:** 816 N LALLENDORF RD  
**City:** OREGON **Township:**  
**County:** Lucas  
**Ohio EPA Facility Permit Number** 2GC03936\*AG

Please read and review the permit carefully. The permit contains requirements and prohibitions with which you must comply. Coverage under this permit will remain in effect until a renewal of the permit is issued by the Ohio EPA. If more than one operator (defined in the permit) will be engaged at the site, each operator shall seek coverage under the general permit. Additional operator(s) shall submit a Co-Permittee NOI to be covered under this facility permit number. There is no fee associated with the Co-Permittee NOI form.

Please be aware that this letter only authorizes discharges in accordance with the above referenced NPDES CGP. The placement of fill into regulated waters of the state may require a 401 Water Quality Certification and/or Isolated Wetlands Permit from Ohio EPA. Also, a Permit-To-Install (PTI) is required for the construction of sanitary or industrial wastewater collection, conveyance, storage, treatment, or disposal facility; unless a specific exemption by rule exists. Failure to obtain the required permits in advance is a violation of Ohio Revised Code 6111 and potentially subjects you to enforcement and civil penalties.

You may obtain additional information, copies of the general permit and current forms/instructions from our website at: <http://epa.ohio.gov/dsw/storm/index.aspx>

If you have questions, please call 614-644-2001.

Ohio EPA has developed a customer service survey to get feedback from regulated entities that have contacted Ohio EPA for regulatory assistance, or worked with the Agency to obtain a permit, license or other authorization. Ohio EPA's goal is to provide our customers with the best possible customer service, and your feedback is important to us in meeting this goal. Please take a few minutes to complete this survey and share your experience with us at <http://www.surveymonkey.com/s/ohioepacustomersurvey>

Sincerely,

Craig W. Butler  
Director

CC: L HABLITZEL

50 West Town Street • Suite 700 • P.O. Box 1049 • Columbus, OH 43216-1049  
[www.epa.ohio.gov](http://www.epa.ohio.gov) • (614) 644-3020 • (614) 644-3184 (fax)



Division of Surface Water - Notice of Intent (NOI) For Coverage Under Ohio  
Environmental Protection Agency General NPDES Permit MJ 10-2-2014

(Read accompanying instructions carefully before completing this form.)

Submission of this NOI constitutes notice that the party identified in Section I of this form intends to be authorized to discharge into state surface waters under Ohio EPA's NPDES general permit program. Becoming a permittee obligates a discharger to comply with the terms and conditions of the permit. Complete all required information as indicated by the instructions. Do not use correction fluid on this form. Forms transmitted by fax will not be accepted. A check for the proper amount must accompany this form and be made payable to "Treasurer, State of Ohio." (See the fee table in Attachment C of the NOI instructions for the appropriate processing fee.)

I. Applicant Information/Mailing Address

Company (Applicant) Name: BVCI

Mailing (Applicant) Address: 816 N. Lallendorf Road

City: Oregon

State: Ohio

Zip Code: 43616

Contact Person: Tom Magdanz

Phone: (863) 602-2098

Fax: Click here.

Contact E-mail Address: MagdanzTO@bv.com

II. Facility/Site Location Information

Facility Name: Oregon Clean Energy Center

Facility Address/Location: 816 N. Lallendorf Road

City: Oregon

State: Ohio

Zip Code: 43616

County(ies): Lucas County

Township(s): Click here to enter text.

Facility Contact Person: Tom Magdanz

Phone: (863) 602-2098

Fax: Click here.

Facility Contact E-mail Address: MagdanzTO@bv.com

(For Construction & Coal, must complete lat/long & attach map)

Latitude: 41°40'3.25"N → 41.667569

Longitude: 83°26'31.41"W

Receiving Stream or MS4: Driftmeyer Ditch and Johlin Ditch

→ -83.442058

III. General Permit Information

General Permit Number: OHC000004 Construction Storm Water

Initial Coverage: ☒

Renewal Coverage: ☐

Type of Activity: All Construction Storm Water - 20 or more acres

SIC Code(s): 4911

disturbed Fee = \$500

Existing NPDES Permit Number: N/A

ODNR Coal Mining Application Number: N/A

If Household Sewage Treatment System, is system for: ☐ new home construction or ☐ replacement of failed

Outfall:	Design Flow (MGD):	Associated Permit Effluent Table:	Latitude:	Longitude:
#.	Flow.	Choose an item.	Click here.	Click here.

Are These Permits Required? PTI No

Individual 401 Water Quality Certification No

Isolated Wetland No

USACE Nationwide Permit No

Individual NPDES Yes - Yet to Apply

Proposed Project Start Date: 10/15/2014

Estimated Completion Date: 7/01/2017

Total Land Disturbance (Acres): 48 acres

MS4 Drainage Area (Sq. Miles):

IV. Payment Information

Check #: 65222559

Check Amount: \$500.00

Date of Check: 9/22/2014

For Ohio EPA Use Only

Check ID (OFA): 677261

ORG #: 120824

Rev ID: 1002239

DOC #: 199582

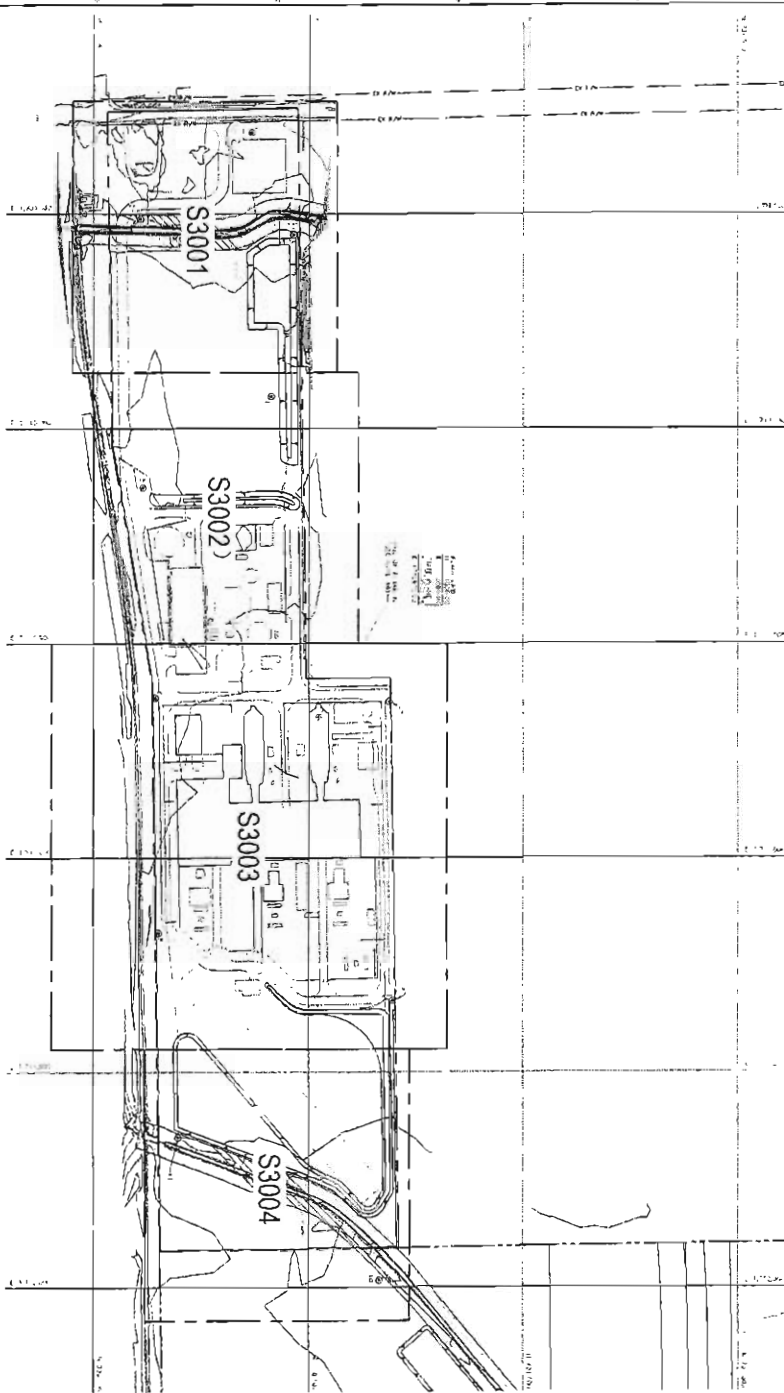
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Applicant Name: Jason Schottler

Applicant Signature: Jason Schottler

Title: Associate Vice President & Project Manager

Date: 9/22/2014



1. The following information is to be submitted to the City of Portland:

- 1.1. The following information is to be submitted to the City of Portland:
- 1.2. The following information is to be submitted to the City of Portland:
- 1.3. The following information is to be submitted to the City of Portland:
- 1.4. The following information is to be submitted to the City of Portland:
- 1.5. The following information is to be submitted to the City of Portland:
- 1.6. The following information is to be submitted to the City of Portland:
- 1.7. The following information is to be submitted to the City of Portland:
- 1.8. The following information is to be submitted to the City of Portland:
- 1.9. The following information is to be submitted to the City of Portland:
- 1.10. The following information is to be submitted to the City of Portland:

LETTER OF APPROVAL TO ALL 1000 PERMITS

1. The following information is to be submitted to the City of Portland:

2. The following information is to be submitted to the City of Portland:

3. The following information is to be submitted to the City of Portland:

4. The following information is to be submitted to the City of Portland:

5. The following information is to be submitted to the City of Portland:

6. The following information is to be submitted to the City of Portland:

7. The following information is to be submitted to the City of Portland:

8. The following information is to be submitted to the City of Portland:

9. The following information is to be submitted to the City of Portland:

10. The following information is to be submitted to the City of Portland:

PERMIT TO CONSTRUCT									
NO.	DATE	DESCRIPTION	APPLICANT	ENGINEER	STATUS	REMARKS	DATE	APPROVED	REMARKS
1	11/11/13	PERMIT TO CONSTRUCT	OREGON CLEAN ENERGY LLC	BLACK & VEATCH	PENDING				
2	11/11/13	PERMIT TO CONSTRUCT	OREGON CLEAN ENERGY LLC	BLACK & VEATCH	PENDING				
3	11/11/13	PERMIT TO CONSTRUCT	OREGON CLEAN ENERGY LLC	BLACK & VEATCH	PENDING				
4	11/11/13	PERMIT TO CONSTRUCT	OREGON CLEAN ENERGY LLC	BLACK & VEATCH	PENDING				
5	11/11/13	PERMIT TO CONSTRUCT	OREGON CLEAN ENERGY LLC	BLACK & VEATCH	PENDING				
6	11/11/13	PERMIT TO CONSTRUCT	OREGON CLEAN ENERGY LLC	BLACK & VEATCH	PENDING				
7	11/11/13	PERMIT TO CONSTRUCT	OREGON CLEAN ENERGY LLC	BLACK & VEATCH	PENDING				
8	11/11/13	PERMIT TO CONSTRUCT	OREGON CLEAN ENERGY LLC	BLACK & VEATCH	PENDING				
9	11/11/13	PERMIT TO CONSTRUCT	OREGON CLEAN ENERGY LLC	BLACK & VEATCH	PENDING				
10	11/11/13	PERMIT TO CONSTRUCT	OREGON CLEAN ENERGY LLC	BLACK & VEATCH	PENDING				

FOR PERMITTING PURPOSES ONLY

OREGON CLEAN ENERGY LLC

BLACK & VEATCH

DATE: 11/11/13

PROJECT: S3001, S3002, S3003, S3004

1. The following information is to be submitted to the City of Portland:

2. The following information is to be submitted to the City of Portland:

3. The following information is to be submitted to the City of Portland:

4. The following information is to be submitted to the City of Portland:

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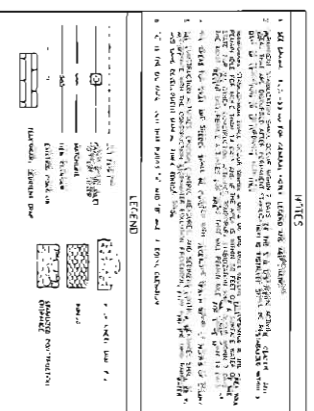
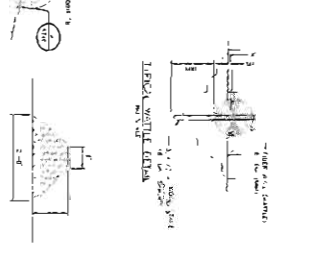
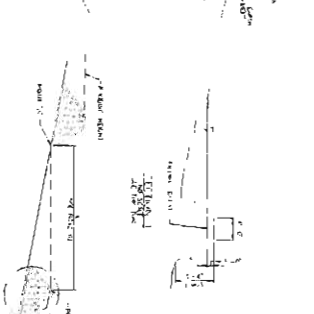
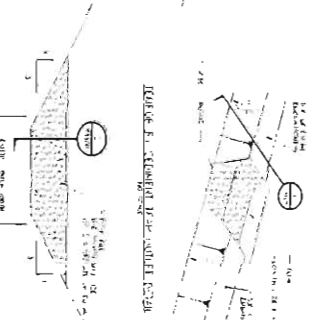
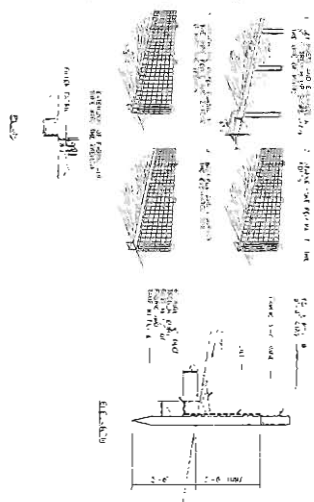
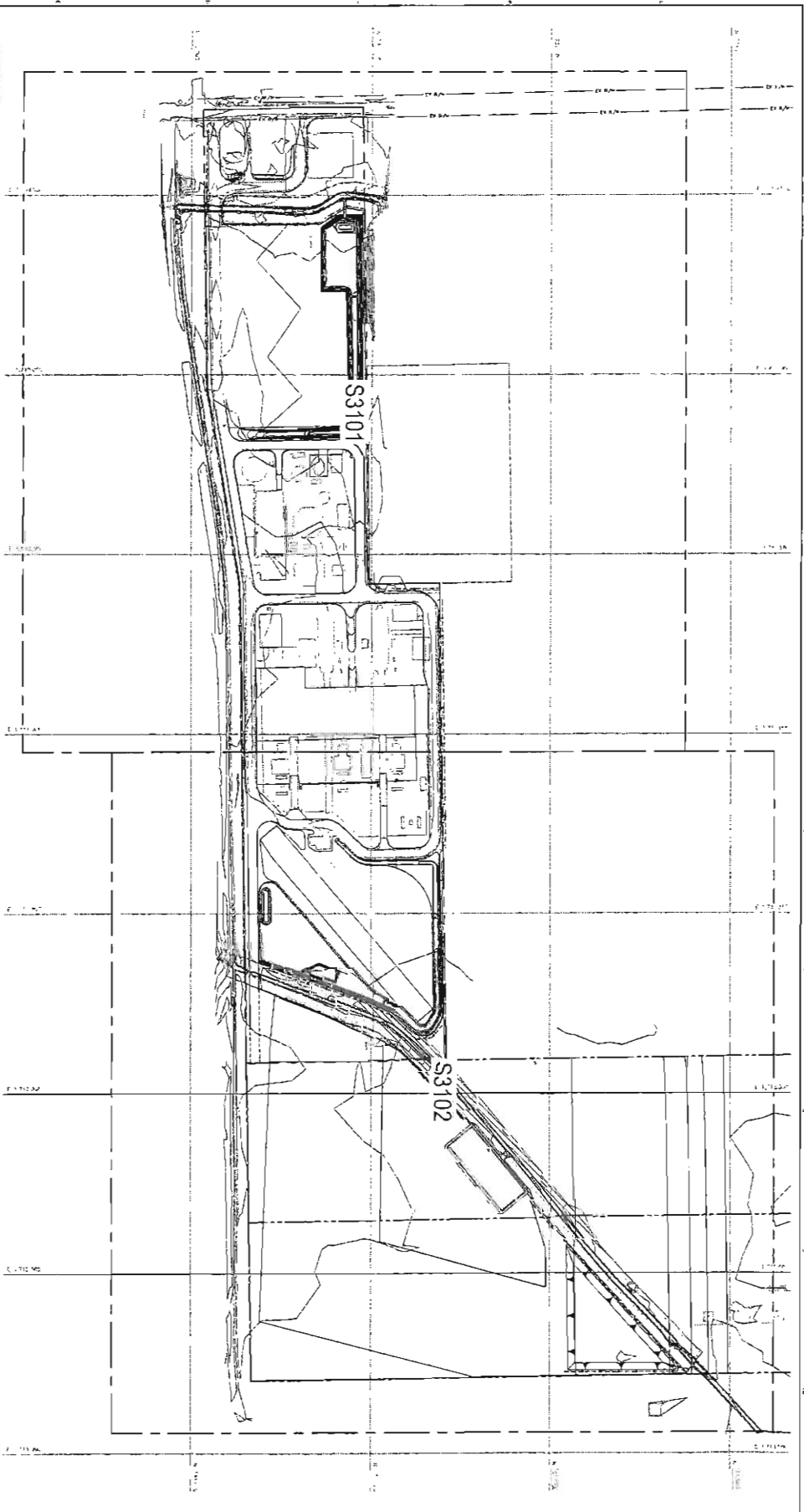
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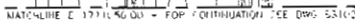
8. The following information is to be submitted to the City of Portland:

9. The following information is to be submitted to the City of Portland:

10. The following information is to be submitted to the City of Portland:



DATE: 10/10/2014		PROJECT: S3101, S3102		SCALE: 1" = 100'		N		1" = 100'	
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FOR PERMITTING  
PURPOSES ONLY

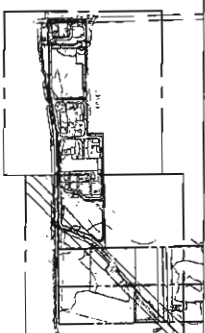
OREGON CLEAN ENERGY LLC  
OREGON CLEAN ENERGY CENTER

EROSION CONTROL - SITE  
PLAN - AREA 1

DESIGN CONTROL - SITE PLAN - AREA 1

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161 PLUM

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DATE	1971	1972	1973	1974	1975	1976	1977	1978	1979	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2037	2038	2039	2040	2041	2042	2043	2044	2045	2046	2047	2048	2049	2050	2051	2052	2053	2054	2055	2056	2057	2058	2059	2060	2061	2062	2063	2064	2065	2066	2067	2068	2069	2070	2071	2072	2073	2074	2075	2076	2077	2078	2079	2080	2081	2082	2083	2084	2085	2086	2087	2088	2089	2090	2091	2092	2093	2094	2095	2096	2097	2098	2099	2100	2101	2102	2103	2104	2105	2106	2107	2108	2109	2110	2111	2112	2113	2114	2115	2116	2117	2118	2119	2120	2121	2122	2123	2124	2125	2126	2127	2128	2129	2130	2131	2132	2133	2134	2135	2136	2137	2138	2139	2140	2141	2142	2143	2144	2145	2146	2147	2148	2149	2150	2151	2152	2153	2154	2155	2156	2157	2158	2159	2160	2161	2162	2163	2164	2165	2166	2167	2168	2169	2170	2171	2172	2173	2174	2175	2176	2177	2178	2179	2180	2181	2182	2183	2184	2185	2186	2187	2188	2189	2190	2191	2192	2193	2194	2195	2196	2197	2198	2199	2200	2201	2202	2203	2204	2205	2206	2207	2208	2209	2210	2211	2212	2213	2214	2215	2216	2217	2218	2219	2220	2221	2222	2223	2224	2225	2226	2227	2228	2229	2230	2231	2232	2233	2234	2235	2236	2237	2238	2239	2240	2241	2242	2243	2244	2245	2246	2247	2248	2249	2250	2251	2252	2253	2254	2255	2256	2257	2258	2259	2260	2261	2262	2263	2264	2265	2266	2267	2268	2269	2270	2271	2272	2273	2274	2275	2276	2277	2278	2279	2280	2281	2282	2283	2284	2285	2286	2287	2288	2289	2290	2291	2292	2293	2294	2295	2296	2297	2298	2299	2300	2301	2302	2303	2304	2305	2306	2307	2308	2309	2310	2311	2312	2313	2314	2315	2316	2317	2318	2319	2320	2321	2322	2323	2324	2325	2326	2327	2328	2329	2330	2331	2332	2333	2334	2335	2336	2337	2338	2339	2340	2341	2342	2343	2344	2345	2346	2347	2348	2349	2350	2351	2352	2353	2354	2355	2356	2357	2358	2359	2360	2361	2362	2363	2364	2365	2366	2367	2368	2369	2370	2371	2372	2373	2374	2375	2376	2377	2378
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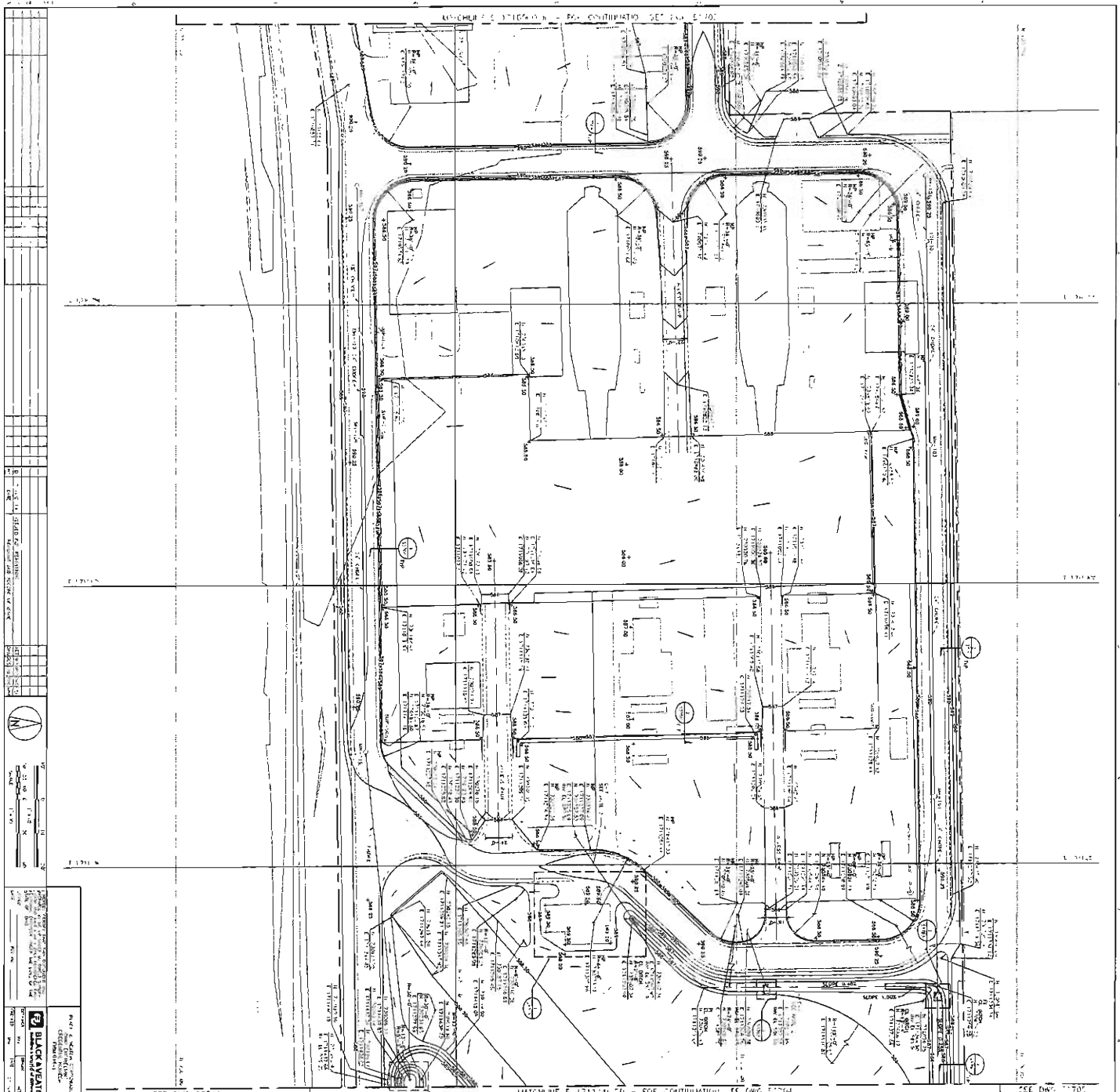
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### TEMPORARY PERMITTING STRUCTURE TABLE

NO.	DESCRIPTION	DATE	BY	CHKD.
1	TEMPORARY PERMITTING STRUCTURE	10/1/20	J. L. L.	J. L. L.
2	TEMPORARY PERMITTING STRUCTURE	10/1/20	J. L. L.	J. L. L.
3	TEMPORARY PERMITTING STRUCTURE	10/1/20	J. L. L.	J. L. L.
4	TEMPORARY PERMITTING STRUCTURE	10/1/20	J. L. L.	J. L. L.
5	TEMPORARY PERMITTING STRUCTURE	10/1/20	J. L. L.	J. L. L.
6	TEMPORARY PERMITTING STRUCTURE	10/1/20	J. L. L.	J. L. L.
7	TEMPORARY PERMITTING STRUCTURE	10/1/20	J. L. L.	J. L. L.
8	TEMPORARY PERMITTING STRUCTURE	10/1/20	J. L. L.	J. L. L.
9	TEMPORARY PERMITTING STRUCTURE	10/1/20	J. L. L.	J. L. L.
10	TEMPORARY PERMITTING STRUCTURE	10/1/20	J. L. L.	J. L. L.

### NOTES

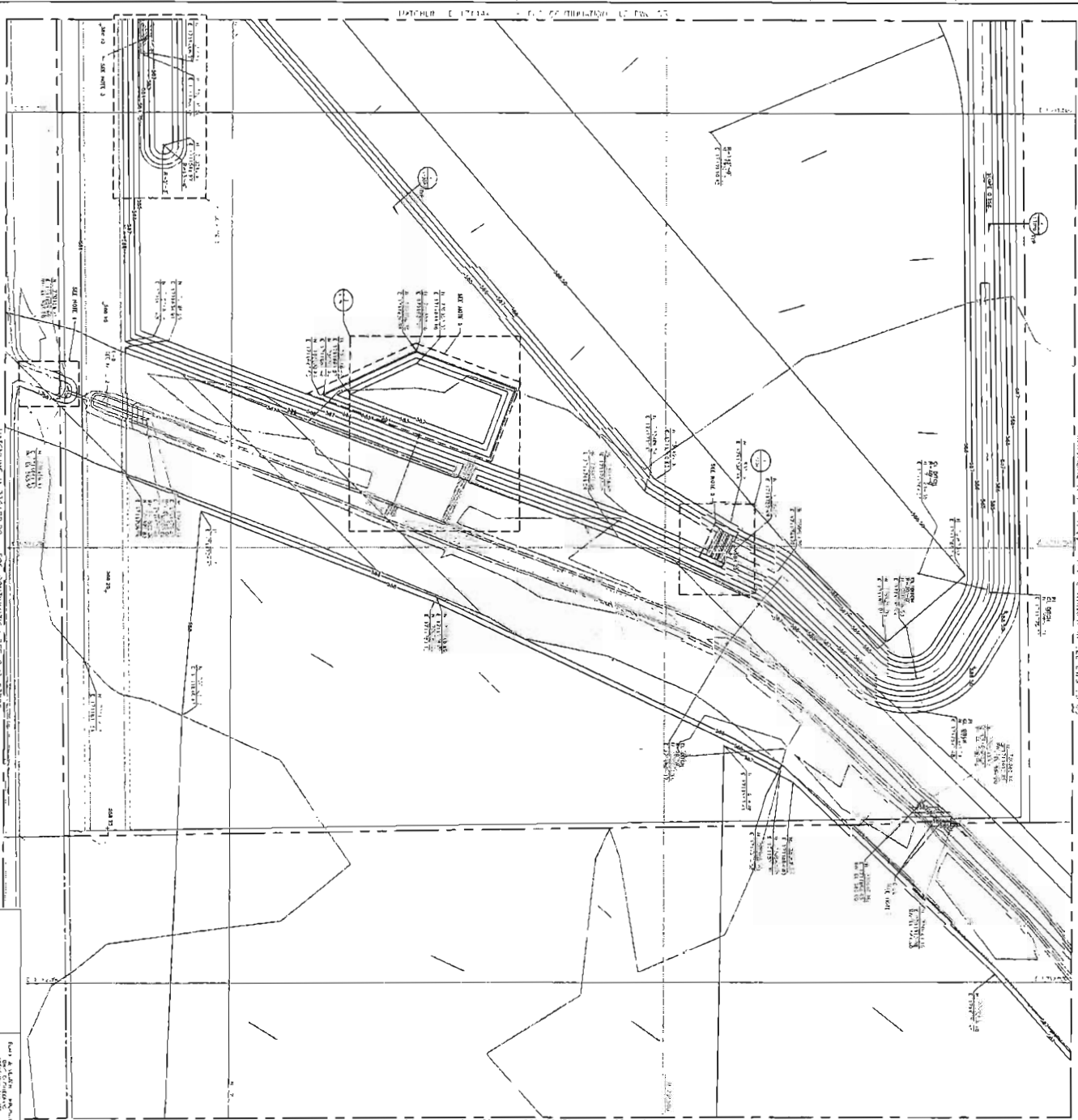
1. SEE DRAWING 5-2703 FOR SITE PLAN AND DIMENSIONS.
2. SEE DRAWING 5-2703 FOR SITE PLAN AND DIMENSIONS.
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**FOR PERMITTING PURPOSES ONLY**

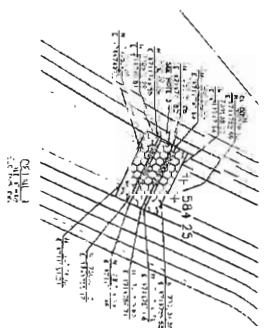
OREGON CLEAN ENERGY LLC  
164704-102C-52703

BLACK & VEATCH  
164704-102C-52703

INDICATING N 71° 15' E - FOR ADMINISTRATION SEE DWG. 3709



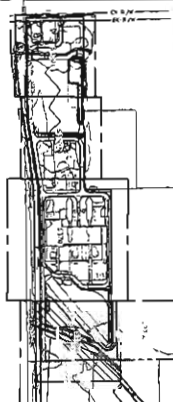
MATCHLINE E 1° 15' 00" N - FOR CONSTRUCTION SEE DWG. 3710



NOTES

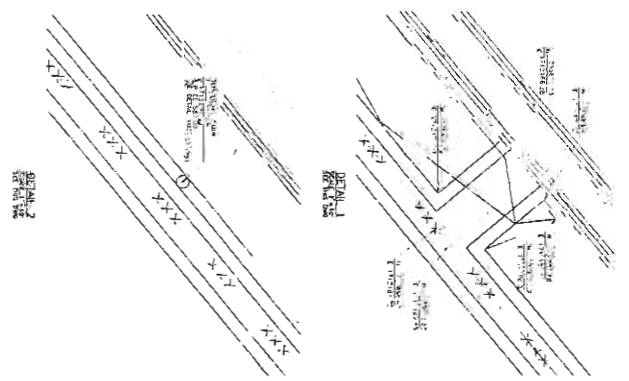
1. All proposed construction shall be in accordance with the applicable provisions of the applicable codes and standards.
2. The owner shall provide all necessary permits and approvals for the proposed construction.
3. The owner shall provide all necessary easements and rights-of-way for the proposed construction.
4. The owner shall provide all necessary utility easements and rights-of-way for the proposed construction.
5. The owner shall provide all necessary environmental and cultural resource clearances for the proposed construction.
6. The owner shall provide all necessary historical and archaeological clearances for the proposed construction.
7. The owner shall provide all necessary fire and life safety clearances for the proposed construction.
8. The owner shall provide all necessary accessibility clearances for the proposed construction.
9. The owner shall provide all necessary energy and efficiency clearances for the proposed construction.
10. The owner shall provide all necessary security clearances for the proposed construction.

SEE PLAN

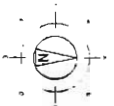
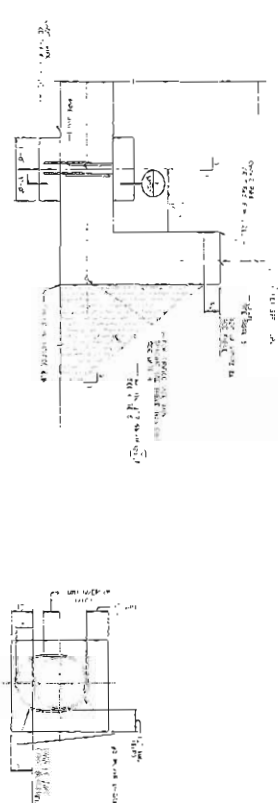
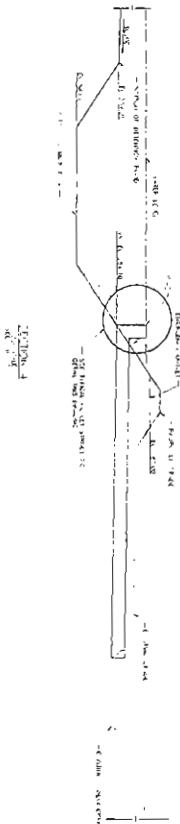
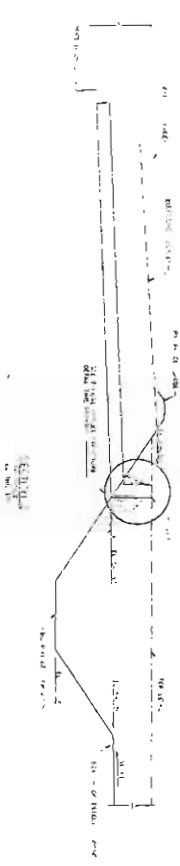
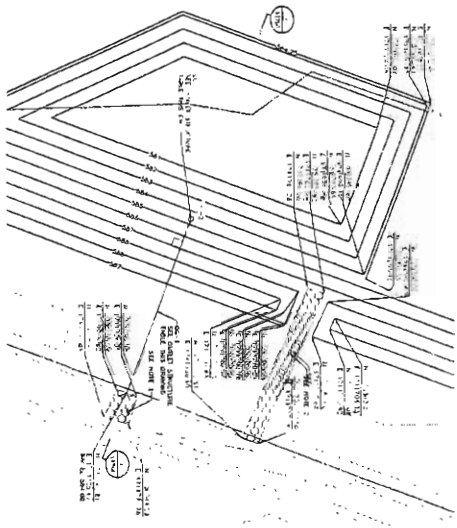
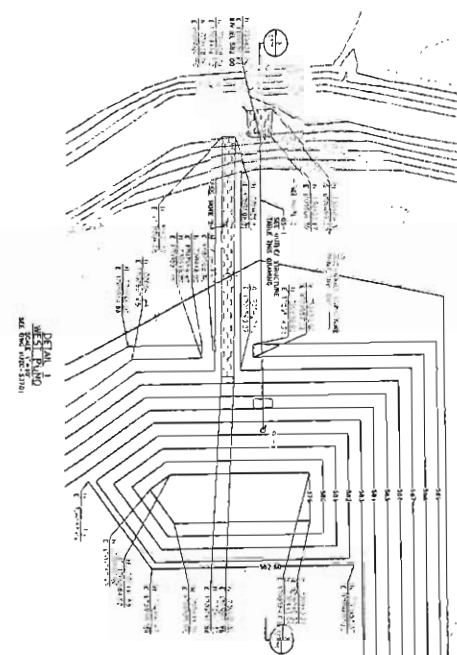


FOR PERMITTING PURPOSES ONLY

OREGON CLEAN ENERGY, LLC	
OREGON CLEAN ENERGY, LLC	
STATE OF OREGON - SITE	DATE: 10/1/2014
PROJECT: 184704-107C-53704	0



1. All (Floor, Wall, etc.) in this section, to be utilized and noted as per 2.	
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SUBJECT SIZE AND ELEVATION TABLE	
NO.	DESCRIPTION
1	PROPOSED ROAD
2	EXISTING ROAD
3	PROPOSED ROAD
4	EXISTING ROAD
5	PROPOSED ROAD
6	EXISTING ROAD
7	PROPOSED ROAD
8	EXISTING ROAD
9	PROPOSED ROAD
10	EXISTING ROAD

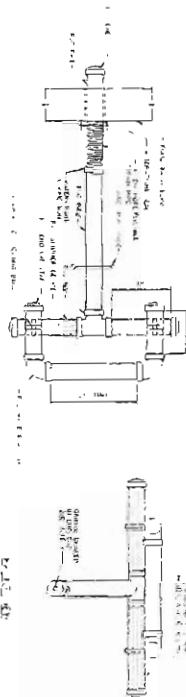
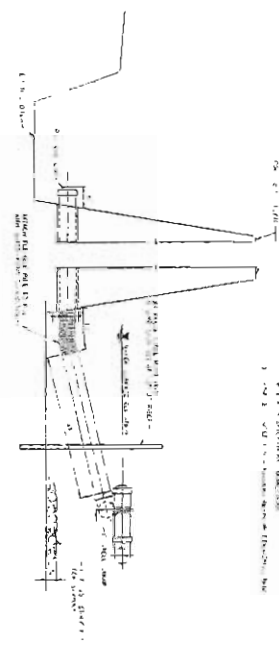
SUBJECT SIZE AND ELEVATION TABLE	
NO.	DESCRIPTION
1	PROPOSED ROAD
2	EXISTING ROAD
3	PROPOSED ROAD
4	EXISTING ROAD
5	PROPOSED ROAD
6	EXISTING ROAD
7	PROPOSED ROAD
8	EXISTING ROAD
9	PROPOSED ROAD
10	EXISTING ROAD



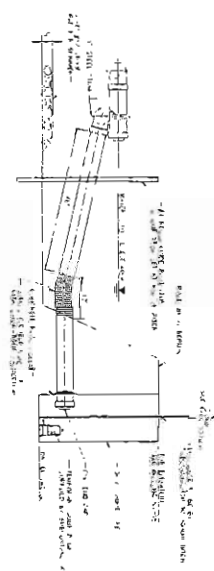
FOR PERMITTING PURPOSES ONLY

ORIGON STATE ENGINEERING  
184704-1122-53750

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1. <b>PROJECT NAME:</b> <u>ORGANIC CLEAN ENERGY, LLC</u> <u>ORGANIC CLEAN ENERGY, LLC</u> <u>19404 - UFG - 53761</u>		2. <b>DATE:</b> <u>0</u>
3. <b>PROJECT LOCATION:</b> <u>3700 E. FORTY-ONE ST.</u> <u>AND WEST EXHIBITION DRIVE</u> <u>CHICAGO, IL 60641</u>		4. <b>DATE:</b> <u>0</u>
5. <b>PROJECT TYPE:</b> <u>REPAIR</u>		6. <b>DATE:</b> <u>0</u>
7. <b>PROJECT DESCRIPTION:</b> <u>REPAIR</u>		8. <b>DATE:</b> <u>0</u>
9. <b>PROJECT STATUS:</b> <u>REPAIR</u>		10. <b>DATE:</b> <u>0</u>
11. <b>PROJECT COMMENTS:</b> <u>REPAIR</u>		12. <b>DATE:</b> <u>0</u>
13. <b>PROJECT CONTACT:</b> <u>REPAIR</u>		14. <b>DATE:</b> <u>0</u>
15. <b>PROJECT CONTACT:</b> <u>REPAIR</u>		16. <b>DATE:</b> <u>0</u>
17. <b>PROJECT CONTACT:</b> <u>REPAIR</u>		18. <b>DATE:</b> <u>0</u>
19. <b>PROJECT CONTACT:</b> <u>REPAIR</u>		20. <b>DATE:</b> <u>0</u>
21. <b>PROJECT CONTACT:</b> <u>REPAIR</u>		22. <b>DATE:</b> <u>0</u>
23. <b>PROJECT CONTACT:</b> <u>REPAIR</u>		24. <b>DATE:</b> <u>0</u>
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FOR PERMITTING PURPOSES ONLY

1. The first of these is the fact that the





**BLACK & VEATCH**  
Building a world of difference.

**BLACK & VEATCH CONSTRUCTION, INC.**  
11401 LAMAR AVENUE, OVERLAND PARK, KS USA

RECEIVED  
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EPA / OFA  
DIVISION FISCAL SECTION

September 22, 2014

Ohio Environmental Protection Agency  
Office of Fiscal Administration  
P.O. Box 1049  
Columbus, OH 43216-1049

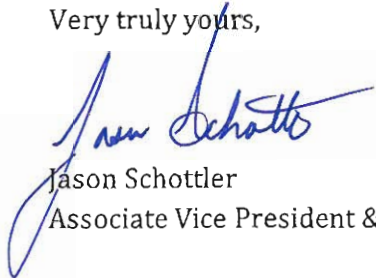
Oregon Clean Energy Center  
B&V Project 184704  
B&V File 34.3600

Attention: Ohio Environmental Protection Agency, Division of Surface Water  
Subject: Coverage under Ohio EPA General Permit Number OHC000004

Black & Veatch Construction, Inc. (BVCI) is submitting the attached Notice of Intent and permit fee for coverage of the Oregon Clean Energy Center under General Permit Number OHC000004.

If you have comments or questions regarding this NOI, please contact Tom Magdanz, BVCI Construction Manager, at (913) 458-8309.

Very truly yours,



Jason Schottler  
Associate Vice President & Project Manager

Enclosure: Notice of Intent (NOI) for Coverage under Ohio Environmental Protection Agency General NPDES Permit

Check No. 65222559

Oregon Clean Energy Center Stormwater Pollution Prevention Plan

cc: Rodney Shultz, Deputy City Engineer, City of Oregon, OH  
Tom Magdanz, BVCI



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

6/18/2013

William Martin  
Oregon Clean Energy Center  
20 Park Plaza, Suite 456  
Boston, MA 02216

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL  
Facility ID: 0448020102  
Permit Number: P0110840  
Permit Type: Initial Installation  
County: Lucas

#### Certified Mail

Yes	TOXIC REVIEW
Yes	PSD
Yes	SYNTHETIC MINOR TO AVOID MAJOR NSR
Yes	CEMS
Yes	MACT/GACT
Yes	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
Yes	MODELING SUBMITTED
Yes	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install (PTI) which will allow you to install or modify the described emissions unit(s) in a manner indicated in the permit. Because this permit contains several conditions and restrictions, we urge you to read it carefully. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

#### **How to appeal this permit**

The issuance of this PTI is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00, made payable to "Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission  
77 South High Street, 17th Floor  
Columbus, OH 43215

## **How to save money, reduce pollution and reduce energy consumption**

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: [www.ohioairquality.org/clean\\_air](http://www.ohioairquality.org/clean_air)

## **How to give us feedback on your permitting experience**

Please complete a survey at [www.epa.ohio.gov/dapc/permitsurvey.aspx](http://www.epa.ohio.gov/dapc/permitsurvey.aspx) and give us feedback on your permitting experience. We value your opinion.

## **How to get an electronic copy of your permit**

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015 or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,



Michael W. Ahern, Manager

Permit Issuance and Data Management Section, DAPC

Cc: U.S. EPA  
TDES; Michigan; Indiana; Canada



**FINAL**

**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
**Oregon Clean Energy Center**

Facility ID:	0448020102
Permit Number:	P0110840
Permit Type:	Initial Installation
Issued:	6/18/2013
Effective:	6/18/2013





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
Oregon Clean Energy Center

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**Final Permit-to-Install**  
Oregon Clean Energy Center  
**Permit Number:** P0110840  
**Facility ID:** 0448020102  
**Effective Date:** 6/18/2013

## Authorization

Facility ID: 0448020102  
Facility Description: 800 MW combined cycle gas turbine (CCGT) facility  
Application Number(s): A0045417, A0046584, A0047327  
Permit Number: P0110840  
Permit Description: Installation of a natural gas-fired combined cycle combustion turbine power plant.  
Permit Type: Initial Installation  
Permit Fee: \$6,050.00  
Issue Date: 6/18/2013  
Effective Date: 6/18/2013

This document constitutes issuance to:

Oregon Clean Energy Center  
816 Lallendorf Rd  
Oregon, OH 43616

of a Permit-to-Install for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services  
348 South Erie Street  
Toledo, OH 43604  
(419)936-3015

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

A handwritten signature in black ink, appearing to read "Scott J. Nally".

Scott J. Nally  
Director



## Authorization (continued)

Permit Number: P0110840

Permit Description: Installation of a natural gas-fired combined cycle combustion turbine power plant.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

**Emissions Unit ID:**

**B001**

Company Equipment ID:

Auxiliary Boiler

Superseded Permit Number:

General Permit Category and Type:

Not Applicable

**Emissions Unit ID:**

**P003**

Company Equipment ID:

Emergency Generator

Superseded Permit Number:

General Permit Category and Type:

Not Applicable

**Emissions Unit ID:**

**P004**

Company Equipment ID:

Emergency Fire Pump

Superseded Permit Number:

General Permit Category and Type:

Not Applicable

**Emissions Unit ID:**

**P005**

Company Equipment ID:

Wet Cooling Tower

Superseded Permit Number:

General Permit Category and Type:

Not Applicable

**Group Name: P001 and P002**

**Emissions Unit ID:**

**P001**

Company Equipment ID:

CTG #1

Superseded Permit Number:

General Permit Category and Type:

Not Applicable

**Emissions Unit ID:**

**P002**

Company Equipment ID:

CTG #2

Superseded Permit Number:

General Permit Category and Type:

Not Applicable



**Final Permit-to-Install**  
Oregon Clean Energy Center  
**Permit Number:** P0110840  
**Facility ID:** 0448020102  
**Effective Date:** 6/18/2013

## **A. Standard Terms and Conditions**



## **1. Federally Enforceable Standard Terms and Conditions**

- a) All Standard Terms and Conditions are federally enforceable, with the exception of those listed below which are enforceable under State law only:
  - (1) Standard Term and Condition A.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

## **2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

## **3. 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 re-issuance, or modification.



- 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, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.
- d) This permit does not convey any property rights of any sort, or any exclusive privilege.
- e) The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying 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.

#### **4. Monitoring and Related Record Keeping and Reporting Requirements**

- a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:
  - (1) The date, place (as defined in the permit), and time of sampling or measurements.
  - (2) The date(s) analyses were performed.
  - (3) The company or entity that performed the analyses.
  - (4) The analytical techniques or methods used.
  - (5) The results of such analyses.
  - (6) The operating conditions existing at the time of sampling or measurement.
- b) Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Toledo Department of Environmental Services.



- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Toledo Department of Environmental Services. The written reports shall be submitted (i.e., postmarked) quarterly, by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted (i.e., postmarked) to the Toledo Department of Environmental Services every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## **5. Scheduled Maintenance/Malfunction Reporting**

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Toledo Department of Environmental Services in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06.

Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

## **6. Compliance Requirements**

- a) The emissions unit(s) identified in this Permit shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.
- b) Any document (including reports) required to be submitted and required by a federally applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.



- c) 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:
  - (1) 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.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) 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.
- d) The permittee shall submit progress reports to the Toledo Department of Environmental Services 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:
  - (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) 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.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

## **8. 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.

## **9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Toledo Department of Environmental Services.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission





limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Toledo Department of Environmental Services. 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 (i.e., postmarked) quarterly, 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.)

## **10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

## **11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.
- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit 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) by submitting a certification from the authorized official that identifies the date on which the emissions unit was permanently shut down. Authorization to operate the affected emissions unit shall cease upon the date certified by the authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in Ohio EPA's "Air Services" along with the date the emissions unit(s) was permanently



removed and/or disabled. Submitting the facility profile update will constitute notifying of the permanent shutdown of the affected emissions unit(s).

- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

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

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## **12. Permit-To-Operate Application**

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

## **13. Construction Compliance Certification**

The applicant shall identify the following dates in the online facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

## **14. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.



**15. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations**

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., postmarked), by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in Air Services once the transfer is legally completed. The change must be submitted through Air Services within thirty days of the ownership transfer date.

**18. Risk Management Plans**

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

**19. 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.



**Final Permit-to-Install**  
Oregon Clean Energy Center  
**Permit Number:** P0110840  
**Facility ID:** 0448020102  
**Effective Date:** 6/18/2013

## **B. Facility-Wide Terms and Conditions**



1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. The permittee shall ensure that any emissions unit(s) subject to the Clean Air Interstate Rule (CAIR) complies/comply with the requirements of the Ohio Administrative Code (OAC) Chapter 3745-109, which includes submitting timely permit applications.
3. The following emissions unit contained in this permit is subject to 40 CFR Part 60 Subpart A and Dc: B001. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the electronic Code of Federal Regulations (e-CFR) website [www.ecfr.gov](http://www.ecfr.gov) or by contacting the appropriate Ohio EPA district or local air agency.
4. The following emissions unit contained in this permit is subject to 40 CFR Part 60 Subpart A and IIII: P003 and P004. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the electronic Code of Federal Regulations (e-CFR) website [www.ecfr.gov](http://www.ecfr.gov) or by contacting the appropriate Ohio EPA district or local air agency.
5. The following emissions unit contained in this permit is subject to 40 CFR Part 60 Subpart A and KKKK: P001 and P002. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the electronic Code of Federal Regulations (e-CFR) website [www.ecfr.gov](http://www.ecfr.gov) or by contacting the appropriate Ohio EPA district or local air agency.
6. The following emissions unit contained in this permit is subject to 40 CFR Part 63 Subpart A and ZZZZ: P003 and P004. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the electronic Code of Federal Regulations (e-CFR) website [www.ecfr.gov](http://www.ecfr.gov) or by contacting the appropriate Ohio EPA district or local air agency.



## **C. Emissions Unit Terms and Conditions**



**1. B001, Auxiliary Boiler**

**Operations, Property and/or Equipment Description:**

99 mmBtu/hr natural gas fired boiler with low-NOx burners and flue gas re-circulation

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 1.4E-03 pound per million Btu (lb/mmBtu) of heat input and 0.14 ton per year.  see b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006	see b)(2)c.
c.	OAC rule 3745-31-10 through 20	Carbon monoxide (CO) emissions shall not exceed 0.055 pound per million Btu (lb/mmBtu) of heat input, 5.45 pounds per hour (lbs/hr), and 5.45 tons per rolling, 12-month period.  Nitrogen Oxides (NO <sub>x</sub> ) emissions shall not exceed 0.020 lb/mmBtu of heat input, 1.98 lbs/hr, and 1.98 tons per rolling, 12-month period.  Particulate matter emissions less than 10 microns in diameter (PM <sub>10</sub> ) and particulate matter less than 2.5 microns in diameter (PM <sub>2.5</sub> ) shall not exceed 0.008 lb/mmBtu of heat input, 0.79 lb/hr, and 0.79 ton per rolling, 12-month period.  Volatile organic compound (VOC) emissions shall not exceed 0.006





	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>lb/mmBtu of heat input, 0.59 lb/hr and 0.59 ton per rolling, 12-month period.</p> <p>Sulfuric acid mist (H<sub>2</sub>SO<sub>4</sub>) emissions shall not exceed 1.1E-04 lb/mmBtu, 0.011 lb/hr, and 0.011 ton per rolling, 12-month period.</p> <p>Carbon dioxide equivalent (CO<sub>2</sub>e) emissions shall not exceed 11,671 tons per rolling, 12-month period.</p> <p>Visible particulate emissions from the stack serving this emissions unit shall not exceed 10 percent opacity as a 6-minute average.</p> <p>see b)(2)d., b)(2)e., and b)(2)k.</p>
d.	OAC rule 3745-17-07(A)	see b)(2)f.
e.	OAC rule 3745-17-10(B)(1)	see b)(2)f.
f.	OAC rule 3745-110-03(J)(16)	exemption - see b)(2)l.
g.	40 CFR Part 60, Subpart A	see b)(2)g.
h.	40 CFR Part 60, Subpart Dc	see b)(2)h. and b)(2)i.
i.	40 CFR Part 63, Subpart JJJJJ	see b)(2)j.

(2) Additional Terms and Conditions

- a. Compliance with the requirements of this rule for CO, NO<sub>x</sub>, PM<sub>10</sub>/PM<sub>2.5</sub>, and VOC emissions includes compliance with the requirements of OAC rule 3745-31-10 through 20.
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by 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 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.



- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO, NO<sub>x</sub>, PM<sub>10</sub>/PM<sub>2.5</sub>, SO<sub>2</sub>, and VOC emissions from this air contaminant source since the uncontrolled potential to emit for CO, NO<sub>x</sub>, PM<sub>10</sub>/PM<sub>2.5</sub>, SO<sub>2</sub>, and VOC is less than 10 tons per year .

- d. All particulate emissions are assumed to be less than 2.5 microns in diameter. The PM<sub>10</sub>/PM<sub>2.5</sub> emissions limitations include both filterable and condensable particulate emissions.
- e. The lb/mmBtu and lb/hr, emission limitations are based on the emissions unit's potentials to emit. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with these emission limitations.
- f. The emission limitation specified by this rule is less stringent than the limitation established by OAC rule 3745-31-10 through 20.
- g. 40 CFR Part 60 subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.
- h. This rule does not establish emission limitations for natural gas-fired boilers, but does require recordkeeping of gas usage per 40 CFR 60.48c(g).
- i. This emissions unit is subject to the applicable provisions of Subpart Dc of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.
- j. This emissions unit is exempt from the requirements of this rule per 40 CFR 63.11195(e) due to combusting only natural gas.
- k. The maximum annual operating hours for this emissions unit shall not exceed 2,000 hours per rolling, 12-month period.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	720
1-2	1,440
1-3	2,000
1-4	2,000
1-5	2,000



1-6	2,000
1-7	2,000
1-8	2,000
1-9	2,000
1-10	2,000
1-11	2,000
1-12	2,000

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

- I. The permittee is exempt from the requirements of OAC rule 3745-110-03(A) through (F), since this permit restricts NOx emissions from this emissions unit to less than 25 tons per year.

c) Operational Restrictions

- (1) The permittee shall burn only natural gas in this emissions unit.

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) The permittee shall maintain monthly records of the following information:
  - a. the operating hours for each month; and
  - b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the operating hours.

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

- (3) See 40 CFR Part 60, Subpart Dc (40 CFR 60.4200-4219).

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (2) Pursuant to the 40 CFR Part 60.7 and 60.48c(a), the permittee is hereby advised of the requirement to report the following at the appropriate times:
  - a. construction date (no later than 30 days after such date);



- b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
    - c. actual start-up date (within 15 days after such date); and
    - d. the design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
  - (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:

all exceedances of the rolling, 12-month limitation on the hours of operation for this emissions unit; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation;

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.
  - (4) See 40 CFR Part 60, Subpart Dc (40 CFR 60.4200-4219).
  - (5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.
- f) Testing Requirements
- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
    - a. Emission Limitation:

CO emissions shall not exceed 0.055 lb/mmBtu of heat input, 5.45 lbs/hr, and 5.45 tons per rolling, 12-month period.

Applicable Compliance Method:

The lb/mmBtu emission limitation is based on manufacturer's data. The hourly emission limitation was developed by multiplying the maximum heat input (99 mmBtu/hr) by the CO emission factor supplied by the manufacturer (0.055 lb/mmBtu) to determine the hourly emissions.

The annual emission limitation was developed by multiplying the hourly emission limitation (5.45 lbs/hr) by the maximum annual operating hours (2,000 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is shown.



b. Emission Limitation:

NO<sub>x</sub> emissions shall not exceed 0.020 lb/mmBtu of heat input, 1.98 lbs/hr, and 1.98 tons per rolling, 12-month period.

Applicable Compliance Method:

The lb/mmBtu limitation is based on manufacturer's data. The hourly emission limitation was developed by multiplying the maximum heat input (99 mmBtu/hr) by the NO<sub>x</sub> emission factor supplied by the manufacturer (0.020 lb/mmBtu) to determine the hourly emissions.

The annual emission limitation was developed by multiplying the hourly emission limitation (1.98 lbs/hr) by the maximum annual operating hours (2,000 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is shown.

c. Emission Limitation:

PM<sub>10</sub> and PM<sub>2.5</sub> shall not exceed 0.008 lb/mmBtu of heat input, 0.79 lb/hr, and 0.79 ton per rolling, 12-month period.

Applicable Compliance Method:

The lb/mmBtu limitation is based on manufacturer's data. The hourly emission limitation was developed by multiplying the maximum heat input (99 mmBtu/hr) by the PM<sub>10</sub>/PM<sub>2.5</sub> emission factor supplied by the manufacturer (0.008 lb/mmBtu) to determine the hourly emissions.

If required, the permittee shall demonstrate compliance with the lb/mmBtu and hourly emission limitation using Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the hourly emission limitation (0.79 lb/hr) by the maximum annual operating hours (2,000 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is shown.

d. Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 1.4E-03 lb/mmBtu of heat input and 0.14 ton/yr.

Applicable Compliance Method:

The lb/mmBtu limitation was established based on using pipeline quality natural gas having a maximum sulfur content of 0.5 grains per 100 cubic feet according to the following calculation. Multiply the maximum sulfur content of natural gas (0.5 grain S/100 scf) by the molecular weight of SO<sub>2</sub> (64.07 lb SO<sub>2</sub>/lb-mole) divide by the molecular weight of sulfur (32.06 lb S/lb-mole) divide by (7,000 grains/lb), divide by (1,020 Btu/scf), and multiply by (10<sup>6</sup> Btu/mmBtu).



If required, the permittee shall demonstrate compliance with the lb/mmBtu and hourly emission limitation using Methods 1 thru 4 and 6C of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the lb/mmBtu emission limitation ( $1.4\text{E-}03$  lb/mmBtu) by the maximum heat input (99 mmBtu/hr), multiplied by the maximum annual operating hours (2,000 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is shown.

e. Emission Limitation:

VOC emissions shall not exceed 0.006 lb/mmBtu of heat input, 0.59 lb/hr, and 0.59 ton per rolling, 12-month period.

Applicable Compliance Method:

The lb/mmBtu limitation is based on manufacturer's data. The hourly emission limitation was developed by multiplying the maximum heat input (99 mmBtu/hr) by the VOC emission factor supplied by the manufacturer (0.006 lb/mmBtu) to determine the hourly emissions.

If required, the permittee shall demonstrate compliance with the lb/mmBtu and hourly emission limitation Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the hourly emission limitation (0.59 lb/hr) by the maximum annual operating hours (2,000 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is maintained.

f. Emission Limitation:

Sulfuric acid mist ( $\text{H}_2\text{SO}_4$ ) emissions shall not exceed  $1.1\text{E-}04$  lb/mmBtu, 0.011 lb/hr, and 0.011 ton per rolling, 12-month period.

Applicable Compliance Method:

The lb/mmBtu emission limitation is based on the assumption that 5% of the  $\text{SO}_2$  emissions are converted to  $\text{SO}_3$  and then converted to  $\text{H}_2\text{SO}_4$  when combined with water vapor by the following calculation.

$1.4\text{E-}03 \text{ lb SO}_2/\text{mmBtu} (0.05) (98 \text{ lb H}_2\text{SO}_4/\text{lb-mole}) (\text{lb-mole}/64 \text{ lb SO}_2) = 1.1\text{E-}04 \text{ lb H}_2\text{SO}_4/\text{mmBtu}$



Multiply the lb H<sub>2</sub>SO<sub>4</sub>/mmBtu (0.11 lb/mmBtu) by the maximum heat input (99 mmBtu/hr) to determine the maximum hourly H<sub>2</sub>SO<sub>4</sub> emissions (0.11 lb/hr), and multiply by the maximum annual hours of operation (2,000 hrs/yr) divided by 2,000 lbs/ton to determine the annual H<sub>2</sub>SO<sub>4</sub> emissions (0.11 ton/yr).

If required, the permittee shall demonstrate compliance with the lb/mmBtu and lb/hr emissions limitations using Methods 1 thru 4 and 8 of 40 CFR Part 60, Appendix A.

g. Emission Limitation:

Carbon dioxide equivalent (CO<sub>2</sub>e) emissions shall not exceed 11,671 tons per rolling, 12-month period.

Applicable Compliance Method:

This emissions limitation was established to reflect the potential to emit for this emissions unit by calculating the sum of the product of the maximum natural gas usage (0.104 mmscf/hr) multiplied by the AP-42 emission factor for CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub> from Table 1.4-2 dated 7/98 (120,000 lb/mmscf, 0.64 lb/mmscf, and 2.3 lb/mmscf, respectively), multiplied by the global warming potential for CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub> (1, 310, and 21, respectively from Table A-1 to Subpart A of 40 CFR 98). Multiply the calculated sum by the natural gas heating value used in the application for this emissions unit (950 Btu/scf), divide by the average heating value used for AP-42 emission factors in Table 1.4-2 dated 7/98 (1,020 Btu/scf), multiply by the maximum annual hours of operation (2,000 hrs/yr) and divide by 2,000 pounds per ton.

$$\begin{aligned} & \left(99 \frac{\text{mmBtu}}{\text{hr}}\right) \times \left[ \left(120,000 \frac{\text{lb}}{\text{mmscf}} \times (1)\right) + \left(0.64 \frac{\text{lb}}{\text{mmscf}} (310)\right) \right. \\ & \quad \left. + \left(2.3 \frac{\text{lb}}{\text{mmscf}} (21)\right) \right] \times \left(\frac{\text{mmscf}}{1020 \text{ mmBtu}}\right) \left(2,000 \frac{\text{hrs}}{\text{hr}}\right) \times \left(\frac{\text{ton}}{2,000 \text{ lb}}\right) \\ & = 11,671 \frac{\text{tons}}{\text{yr}} \end{aligned}$$

Since the CO<sub>2</sub>e emissions are estimated to consist of more than 99% CO<sub>2</sub>, compliance with this emission limitation will be assumed provided that the lb/scf CO<sub>2</sub> emission rate does not exceed 120,000 lb/mmscf.

If required, the permittee shall conduct emissions testing using Methods 1, 2, 3A and 4 of 40 CFR Part 60, Appendix A to determine the lb/scf CO<sub>2</sub> emission rate.

h. Emission Limitation:

Visible emissions shall not exceed 10% opacity as a 6-minute average, except as provided by rule.



Applicable Compliance Method:

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with Method 9 of 40 CFR Part 60, Appendix A.

- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the following emissions limitations:

- i. CO emissions in lb/hr and lb/mmBtu; and
- ii. NO<sub>x</sub> emissions in lb/hr and lb/mmBtu.

The emission testing shall also be conducted to determine the CO<sub>2</sub> emission rate in lb/hr and lb/mmBtu.

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

for CO, Methods 1 thru 4 of 40 CFR Part 60, Appendix A; and

for NO<sub>x</sub> Methods 1 thru 4 and 7E of 40 CFR Part 60, Appendix A.

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

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.





- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
  - f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
- g) Miscellaneous Requirements
- (1) None.



**2. P003, Emergency Generator**

**Operations, Property and/or Equipment Description:**

2,250 kW emergency diesel fired generator

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.03 pound per hour (lb/hr) and 0.008 ton per year.  see b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006	see b)(2)c.
c.	OAC rule 3745-31-10 through 20	Carbon monoxide (CO) emissions shall not exceed 3.5 g/kW-hr, 17.35 pounds per hour (lbs/hr), and 4.34 tons per rolling, 12-month period.  Nitrogen oxides (NO <sub>x</sub> ) emissions shall not exceed 5.61 g/kW-hr, 27.8 lbs/hr, and 6.95 tons per rolling, 12-month period.  Particulate matter emissions less than 10 microns in diameter (PM <sub>10</sub> ) and particulate matter less than 2.5 microns in diameter (PM <sub>2.5</sub> ) shall not exceed 0.20 g/kW-hr, 0.99 lb/hr, and 0.25 tons per rolling, 12-month period.  Volatile organic compound (VOC) emissions shall not exceed 0.79 g/kW-hr, 3.93 lbs/hr, and 0.98 ton per rolling, 12-month period.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Sulfuric acid mist (H<sub>2</sub>SO<sub>4</sub>) emissions shall not exceed 1.32E-04 g/kW-hr, 6.5 E-04 lb/hr and 1.6E-04 ton per rolling, 12-month period.</p> <p>Carbon dioxide equivalent (CO<sub>2</sub>e) emissions shall not exceed 878 tons per rolling, 12-month period.</p> <p>see b)(2)d. and b)(2)e.</p>
d.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average.
e.	OAC rule 3745-17-11(B)(5)(a)	see b)(2)f.
f.	OAC rule 3745-110-03(J)(16), and (J)(19)	exemptions – see b)(2)g.
g.	40 CFR Part 60, Subpart A (40 CFR 60.1-19)	Table 8 to Subpart IIII of 40 CFR Part 60 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR 60.1-19 apply.
h.	40 CFR Part 60, Subpart IIII (40 CFR 60.4200–4219)  [In accordance with 40 CFR 60.4200(a)(2), this emissions unit is a compression ignition emergency stationary internal combustion engine (CI ICE) for which construction commenced after July 11, 2005 subject to the emissions limitation/control measures specified in this section.]	<p>Non-methane hydrocarbon (NMHC) + NO<sub>x</sub> emissions shall not exceed 6.4 g/kW-hr.</p> <p>CO emissions shall not exceed 3.5 g/kW-hr.</p> <p>PM emissions shall not exceed 0.20 g/kW-hr.</p> <p>Exhaust opacity shall not exceed:              20 percent during acceleration mode;              15 percent during lugging mode; and              50 percent during the peaks in either the acceleration or lugging modes.</p> <p>see b)(2)h.</p> <p>[60.4205(b) and 60.4207(b)]</p>
i.	40 CFR Part 63, Subpart ZZZZ (40 CFR 63.6580-63.6675)  [In accordance with 40 CFR 63.6590(c)(1), this emissions unit is a new stationary internal combustion	<p>see b)(2)i.</p> <p>[63.6590(c), (c)(1)]</p>



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
	engine (RICE) located at an area source of HAP emissions subject to the emissions limitation/control measures specified in this section.]	

(2) Additional Terms and Conditions

- a. Compliance with the requirements of this rule for CO, NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC emissions includes compliance with the requirements of OAC rule 3745-31-10 through 20.
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by 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 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO, NO<sub>x</sub>, PM<sub>10</sub>/PM<sub>2.5</sub>, SO<sub>2</sub>, and VOC emissions from this air contaminant source since the uncontrolled potential to emit for CO, NO<sub>x</sub>, PM<sub>10</sub>/PM<sub>2.5</sub>, SO<sub>2</sub>, and VOC is less than 10 tons per year taking into account the federally enforceable emissions limitations and operating hours restriction specified by OAC rule 3745-31-10 through 20.

- d. All particulate emissions are assumed to be less than 2.5 microns in diameter. The PM<sub>10</sub>/PM<sub>2.5</sub> emissions limitations include both filterable and condensable particulate emissions.
- e. The maximum annual operating hours for this emissions unit shall not exceed 500 hours, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:



<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	500
1-2	500
1-3	500
1-4	500
1-5	500
1-6	500
1-7	500
1-8	500
1-9	500
1-10	500
1-11	500
1-12	500

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

- f. The emission limitation specified by this rule is less stringent than the emission limitation established by OAC rule 3745-31-10 through 20.
  - g. The requirements of this rule do not apply, since:
    - i. NO<sub>x</sub> emissions are restricted to less than 25 tons per year; and
    - ii. the emissions unit is subject to a BACT limitation for NO<sub>x</sub>.
  - h. The permittee shall only combust diesel fuel in this emissions unit meeting the following per gallon standards:
    - 15 ppm maximum sulfur content; and
    - a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.
  - i. This emissions unit must meet the requirements of 40 CFR Part 60 Subpart IIII. No further requirements apply under this subpart.
- c) Operational Restrictions
- (1) See 40 CFR Part 60, Subpart IIII (40 CFR 60.4200-4219).
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records of the following information:
    - a. the operating hours for each month; and



- b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the operating hours.

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

- (2) For each shipment of diesel fuel received for burning in this emissions unit, the permittee shall maintain records of the oil supplier's (or permittee's) analyses for sulfur content in parts per million (40 CFR 80.510). The permittee shall perform or require the supplier to perform the analyses for sulfur content in accordance with 40 CFR 80.585.
- (3) The permittee shall also maintain documentation of supplier verification that the diesel fuel as purchased has a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.
- (4) See 40 CFR Part 60, Subpart IIII (40 CFR 60.4200-4219).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. each shipment of diesel fuel received for burning in this emissions unit which did not comply with the per gallon standards specified in b)(2); and
  - b. all exceedances of the rolling, 12-month limitation on the hours of operation for this emissions unit; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) See 40 CFR Part 60, Subpart IIII (40 CFR 60.4200-4219).
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:
  - a. Emission Limitation:  
  
CO emissions shall not exceed 3.5 g/kW-hr, 17.35 lbs/hr, and 4.34 tons per rolling, 12-month period.



**Applicable Compliance Method:**

The g/kW-hr limitation is based on the Tier 2 emission standards under 40 CFR 89.112(a), Subpart B, Table 1. The hourly emission limitation was developed by multiplying the maximum operating load (2,250 kW) by the CO emission factor supplied by the manufacturer (3.5 g/kW-hr) and dividing by (454 g/lb) to determine the hourly emissions.

If required, the permittee shall demonstrate compliance with the g/kW-hr limitation and hourly emission limitation using Methods 1 thru 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.

The annual emission limitation was developed by multiplying the hourly emission limitation (17.35 lbs/hr) by the maximum annual operating hours (500 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation and operating hours restriction is shown.

**b. Emission Limitation:**

NO<sub>x</sub> emissions shall not exceed 5.61 g/kW-hr, 27.8 lbs/hr, and 6.95 tons per rolling, 12-month period.

**Applicable Compliance Method:**

The g/kW-hr limitation is based on the combined NO<sub>x</sub> + NMHC emission limitation specified by the Tier 2 standard in 40 CFR 89.112(a) Table 1 (6.4 g/kW-hr) multiplied by the Tier 1 emission limitation for NO<sub>x</sub> in Table 1 (9.2 g/kW-hr) divided by the sum of the Tier 1 emission limitations for NO<sub>x</sub> and HC in Table 1 (9.2 g/kW-hr + 1.3 g/kW-hr). The hourly emission limitation was developed by multiplying the maximum operating load (2,250 kW) by the NO<sub>x</sub> g/kW-hr emission limitation (5.61 g/kW-hr) divided by (454 g/lb) to determine the hourly emissions.

If required, the permittee shall demonstrate compliance with the g/kW-hr limitation and hourly emission limitation using Methods 1 thru 4 and 7E of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the hourly emission limitation (27.8 lbs/hr) by the maximum annual operating hours (500 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation and operating hours restriction is shown.

**c. Emission Limitation:**

PM<sub>10</sub>/PM<sub>2.5</sub> emissions shall not exceed 0.20 g/kW-hr, 0.99 lb/hr, and 0.25 ton per rolling, 12-month period.



**Applicable Compliance Method:**

The g/kW-hr limitation is based on manufacturer's emissions data. The hourly emission limitation was developed by multiplying the maximum operating load (2,250 kW) by the PM<sub>10</sub>/PM<sub>2.5</sub> emission factor supplied by the manufacturer (0.20 g/kW-hr) divided by (454 g/lb) to determine the hourly emissions.

If required, the permittee shall demonstrate compliance with the g/kW-hr limitation and hourly emission limitation using Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the hourly emission limitation (0.99 lb/hr) by the maximum annual operating hours (500 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation and operating hours restriction is shown.

**d. Emission Limitation:**

SO<sub>2</sub> emissions shall not exceed 0.03 lb/hr and 0.008 ton/yr.

**Applicable Compliance Method:**

The hourly emission limitation is based dividing the AP-42 emission factor for SO<sub>2</sub> from AP-42 Table 3.4-1 dated 10/96 when burning diesel fuel with a maximum sulfur content of 15 ppmw (0.0015 lb/mmBtu) by (10<sup>6</sup> Btu/mmBtu) multiplied by (7,000 Btu/hp-hr) and multiplied by the maximum power rating (3,016.6 hp).

If required, the permittee shall demonstrate compliance with the hourly emission limitation using Methods 1 thru 4 and 6C of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the hourly emission limitation (0.03 lb/hr) by the maximum annual operating hours (500 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation and operating hours restriction is shown.

**e. Emission Limitation:**

VOC emissions shall not exceed 0.79 g/kW-hr, 3.93 lbs/hr, and 0.98 ton per rolling, 12-month period.

**Applicable Compliance Method:**

The g/kW-hr limitation is based on the combined NO<sub>x</sub> + NMHC emission limitation specified by the Tier 2 standard in 40 CFR 89.112(a) Table 1 (6.4 g/kW-hr) multiplied by the Tier 1 emission limitation for NMHC in Table 1 (1.3





g/kW-hr) divided by the sum of the Tier 1 emission limitations for NO<sub>x</sub> and HC in Table 1 (9.2 g/kW-hr + 1.3 g/kW-hr). The hourly emission limitation was developed by multiplying the maximum operating load (2250 kW) by the VOC emission factor supplied by the manufacturer (0.79 g/kW-hr) to determine the hourly emissions.

If required, the permittee shall demonstrate compliance with the g/kW-hr limitation and hourly emission limitation using Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the hourly emission limitation (3.93 lbs/hr) by the maximum annual operating hours (500 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation and operating hours restriction is shown.

f. Emission Limitation:

H<sub>2</sub>SO<sub>4</sub> emissions shall not exceed 1.32E-04 g/kW-hr, 6.5 E-04 lb/hr and 1.6E-04 ton per rolling, 12-month period.

Applicable Compliance Method:

The g/kW-hr emission is based on the sulfuric acid mist emission factor from page 276 of Toxic Air Pollution Emission Factors, EPA 450/2-90-011 (8.9 ng/J x %sulfur in fuel = 8.9(0.0015) = 0.01335 ng/J). The H<sub>2</sub>SO<sub>4</sub> emission factor (0.01335 ng/J) was converted to g/kW-hr by multiplying by (1055.1 J/Btu), multiplying by (7000 Btu/hp-hr), multiplying by (g/10<sup>9</sup> ng), and multiplying by (1.341 hp/kW) = 1.32E-04 g/kW-hr.

The pound per hour emissions limitation was developed by multiplying the g/kW-hr allowable H<sub>2</sub>SO<sub>4</sub> emission limitation (1.32E-04 g/kW-hr) by the maximum operating load (2,250 kW) and divided by 454 grams per pound to determine the hourly emissions (6.5E-04 lb/hr).

If required, the permittee shall demonstrate compliance with the g/kW-hr and lb/hr emission limitation using Methods 1 thru 4 and 8 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The ton per year emission limitation was developed by multiplying the hourly allowable H<sub>2</sub>SO<sub>4</sub> emission limitation (6.5E-04 lb/hr) by the maximum annual hours of operation (500 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.



g. Emission Limitation:

Carbon dioxide equivalent (CO<sub>2</sub>e) emissions shall not exceed 877 tons per rolling, 12-month period.

Applicable Compliance Method:

This emissions limitation was established to reflect the potential to emit for this emissions unit by calculating the sum of the maximum capacity (3016.6 hp) by the emission factor for CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub>, multiplied by the global warming potential for CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub> (1, 310, and 21, respectively from Table A-1 to Subpart A of 40 CFR 98). Multiply the sum by the maximum annual hours of operation (500 hrs/yr) and divide by 2,000 pounds per ton. The CO<sub>2</sub> emission factor was obtained from AP-42 Table 3.4-1 dated 10/96 (1.16 lb/hp-hr). The N<sub>2</sub>O emission factor was obtained from 40 Table C-2 to Subpart C of 40 CFR 98 (0.6 g/mmBtu). The CH<sub>4</sub> emission factor was obtained from AP-42 Table 3.4-1 dated 10/96 (7.05E-04 lb TOC/hp-hr x 0.09 lb CH<sub>4</sub>/lb TOC = 6.34E-05 lb CH<sub>4</sub>/hp-hr).

$$\begin{aligned} & (3016.6 \text{ hp}) \times \left[ \left( 1.16 \frac{\text{lb}}{\text{hp-hr}} (1) \right) \right. \\ & \quad + \left( \left( 0.6 \frac{\text{g}}{\text{mmBtu}} \right) \left( 7000 \frac{\text{Btu}}{\text{hp-hr}} \right) \left( \frac{\text{mmBtu}}{1\text{E}06\text{Btu}} \right) \left( \frac{\text{lb}}{454\text{g}} \right) (310) \right) \\ & \quad \left. + \left( 6.34\text{E} - 05 \frac{\text{lb}}{(\text{hp-hr})} \right) (21) \right] \times \left( 500 \frac{\text{hrs}}{\text{hr}} \right) \times \left( \frac{\text{ton}}{2,000\text{lb}} \right) \\ & = 878 \text{ tons/yr} \end{aligned}$$

Since the CO<sub>2</sub>e emissions are estimated to consist of more than 99% CO<sub>2</sub>, compliance with this emission limitation will be assumed provided that the lb/hp-hr CO<sub>2</sub> emission rate does not exceed 1.16 lb/hp-hr. If required, the permittee shall conduct emissions testing using Methods 1, 2, 3A and 4 of 40 CFR Part 60, Appendix A to determine the lb/hp-hr CO<sub>2</sub> emission rate.

h. Emission Limitation:

The permittee shall only combust diesel fuel in this emissions unit meeting the following per gallon standard: 15 ppm maximum sulfur content

Applicable Compliance Method:

The records required by d)(2) shall be used to demonstrate compliance.

i. Emission Limitation:

The permittee shall only combust diesel fuel in this emissions unit meeting the following per gallon standard: a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.



Applicable Compliance Method:

The records required by d)(2) and d)(3) shall serve as demonstration of compliance.

j. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance according to Method 9 of 40 CFR Part 60, Appendix A.

k. Emission Limitation:

NMHC + NO<sub>x</sub> emissions shall not exceed 6.4 g/kW-hr;

CO emissions shall not exceed 3.5 g/kW-hr;

PM emissions shall not exceed 0.20 g/kW-hr;

Exhaust opacity shall not exceed:

20 percent during acceleration mode;

15 percent during lugging mode; and

50 percent during the peaks in either the acceleration or lugging modes.

Applicable Compliance Method:

According to 40 CFR 60.4211(c), the permittee shall demonstrate compliance with these emissions limitations by purchasing an engine certified to the emission standards in 40 CFR 60.4205(b) for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in 40 CFR 60.4211(g). The permittee shall maintain documentation of certification to the emission standards in 40 CFR 60.4205.

g) Miscellaneous Requirements

(1) None.



**3. P004, Emergency Fire Pump**

**Operations, Property and/or Equipment Description:**

300 hp (223.8 kW) emergency diesel-fired fire pump engine

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 0.003 lb/hr and 8.0 E-04 ton/yr.  see b)(2)a. and b)(2)b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006	see b)(2)c.
c.	OAC rule 3745-31-10 through 20	Carbon monoxide (CO) emissions shall not exceed 3.5 g/kW-hr, 1.7 pounds per hour (lbs/hr), and 0.43 ton per rolling, 12-month period.  Nitrogen Oxides (NO <sub>x</sub> ) emissions shall not exceed 3.5 g/kW-hr, 1.7 lb/hr, and 0.43 ton per rolling, 12-month period.  Particulate matter emissions less than 10 microns in diameter (PM <sub>10</sub> ) and particulate matter less than 2.5 microns in diameter (PM <sub>2.5</sub> ) shall not exceed 0.20 g/kW-hr, 0.10 lb/hr, and 0.025 ton per rolling, 12-month period.  Volatile organic compound (VOC) emissions shall not exceed 0.50 g/kW-hr, 0.25 lb/hr, and 0.06 ton per rolling, 12-month period.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>H<sub>2</sub>SO<sub>4</sub> emissions shall not exceed 1.32 E-04 g/kW-hr, 6.5E-05 lb/hr and 1.6E-05 ton per rolling, 12-month period</p> <p>Carbon dioxide equivalent (CO<sub>2</sub>e) emissions shall not exceed 87 tons per rolling, 12-month period.</p> <p>see b)(2)d. and b)(2)e.</p>
d.	OAC rule 3745-17-07(A)	Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average.
e.	OAC rule 3745-17-11(B)(5)(a)	see b)(2)f.
f.	OAC rule 3745-18-06(G)	less stringent than 40 CFR Part 63, Subpart IIII
g.	OAC rule 3745-110-03(J)(16), (19)	exemption – see b)(2)g.
h.	40 CFR Part 60, Subpart A (40 CFR 60.1-19)	Table 8 to Subpart IIII of 40 CFR Part 60 – Applicability of General Provisions to Subpart IIII shows which parts of the General Provisions in 40 CFR 60.1-19 apply.
i.	40 CFR Part 60, Subpart IIII (40 CFR 60.4200–4219)  [In accordance with 40 CFR 60.4200(a)(2), this emissions unit is a compression ignition stationary internal combustion fire pump engine for which construction commenced after July 11, 2005 subject to the emissions limitation/control measures specified in this section.]	<p>Non-methane hydrocarbon (NMHC) + NO<sub>x</sub> emissions shall not exceed 4.0 g/kW-hr.</p> <p>CO emissions shall not exceed 3.5 g/kW-hr.</p> <p>PM emissions shall not exceed 0.20 g/kW-hr.</p> <p>see b)(2)h.</p> <p>[60.4205(c) and 60.4207(b)]</p>
j.	40 CFR Part 63, Subpart ZZZZ (40 CFR 63.6580-63.6675)  [In accordance with 40 CFR 63.6590(c)(1), this emissions unit is a new stationary reciprocating internal combustion engine (RICE) located at an area source of HAP emissions subject to the emissions limitation/control measures specified in this section.]	<p>see b)(2)i</p> <p>[63.6590(c), (c)(1)]</p>



(2) Additional Terms and Conditions

- a. Compliance with the requirements of this rule for CO, NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC emissions includes compliance with the requirements of OAC rule 3745-31-10 through 20.
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by 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 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the CO, NO<sub>x</sub>, PM<sub>10</sub>/PM<sub>2.5</sub>, SO<sub>2</sub>, and VOC emissions from this air contaminant source since the uncontrolled potential to emit for CO, NO<sub>x</sub>, PM<sub>10</sub>/PM<sub>2.5</sub>, SO<sub>2</sub>, and VOC is less than 10 tons per year taking into consideration the federally enforceable emissions limitations and operating hours restriction specified by OAC rule 3745-31-10 through 20.

- d. All particulate emissions are assumed to be less than 2.5 microns in diameter. The PM<sub>10</sub>/PM<sub>2.5</sub> emissions limitations include both filterable and condensable particulate emissions.
- e. The maximum annual operating hours for this emissions unit shall not exceed 500 hours, based upon a rolling, 12-month summation of the operating hours.

To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the operating hours levels specified in the following table:

<u>Month(s)</u>	<u>Maximum Allowable Cumulative Operating Hours</u>
1	500
1-2	500
1-3	500
1-4	500
1-5	500
1-6	500
1-7	500



1-8	500
1-9	500
1-10	500
1-11	500
1-12	500

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

- f. The emission limitation specified by this rule is less stringent than the emission limitation established by OAC rule 3745-31-10 through 20.
  - g. The requirements of this rule do not apply, since:
    - i. NOx emissions are restricted to less than 25 tons per year; and
    - ii. the emissions unit is subject to a BACT limitation for NOx.
  - h. The permittee shall only combust diesel fuel in this emissions unit meeting the following per gallon standards:
    - 15 ppm maximum sulfur content; and
    - a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.
  - i. This emissions unit must meet the requirements of 40 CFR Part 60 Subpart IIII. No further requirements apply under this subpart.
- c) Operational Restrictions
- (1) See 40 CFR Part 60, Subpart IIII (40 CFR 60.4200-4219).
- d) Monitoring and/or Recordkeeping Requirements
- (1) The permittee shall maintain monthly records of the following information:
    - a. the operating hours for each month; and
    - b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the operating hours.
- Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative operating hours for each calendar month.
- (2) For each shipment of diesel fuel received for burning in this emissions unit, the permittee shall maintain records of the oil supplier's (or permittee's) analyses for sulfur content in



parts per million (40 CFR 80.510). The permittee shall perform or require the supplier to perform the analyses for sulfur content in accordance with 40 CFR 80.585.

- (3) The permittee shall also maintain documentation of supplier verification that the diesel fuel as purchased has a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.
- (4) See 40 CFR Part 60, Subpart IIII (40 CFR 60.4200-4219).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. each shipment of diesel fuel received for burning in this emissions unit which did not comply with the per gallon standards specified in b)(2); and
  - b. all exceedances of the rolling, 12-month limitation on the hours of operation for this emissions unit; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (2) See 40 CFR Part 60, Subpart IIII (40 CFR 60.4200-4219).
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

CO emissions shall not exceed 3.5 g/kW-hr, 1.7 lbs/hr, and 0.43 ton per rolling, 12-month period.

Applicable Compliance Method:

The g/kW-hr limitation is based on the standard specified in Table 4 to 40 CFR Part 60, Subpart IIII. The hourly emission limitation was developed by multiplying the maximum operating load (223.8 kW) by the g/kW-hr CO emission limitation (3.5 g/kW-hr) divided by (454 g/lb) to determine the hourly emissions.

If required, the permittee shall demonstrate compliance with the g/kW-hr limitation and hourly emission limitation using Methods 1 thru 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.

The annual emission limitation was developed by multiplying the hourly emission limitation (1.7 lbs/hr) by the maximum annual operating hours (500 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation and operating hours restriction is shown.

b. Emission Limitation:

NOx emissions shall not exceed 3.5 g/kW-hr, 1.7 lbs/hr, and 0.43 ton per rolling, 12-month period.

Applicable Compliance Method:

The g/kW-hr limitation is based on the combined NOx + NMHC emission limitation specified by the Table 2 to 40 CFR Part 60, Subpart IIII (4.0 g/kW-hr) multiplied by the Tier 1 emission limitation for NOx in Table 1 to 40 CFR 89.112(a) (9.2 g/kW-hr) divided by the sum of the Tier 1 emission limitations for NOx and HC in Table 1 to 40 CFR 89.112(a) (9.2 g/kW-hr + 1.3 g/kW-hr). The hourly emission limitation was developed by multiplying the maximum operating load (223.8 kW) by the g/kW-hr NOx emission limitation (3.5 g/kW-hr) divided by (454 g/lb) to determine the hourly emissions.

If required, the permittee shall demonstrate compliance with the g/kW-hr limitation and hourly emission limitation using Methods 1 thru 4 and 7E of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the hourly emission limitation (1.7 lbs/hr) by the maximum annual operating hours (500 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation and operating hours restriction is shown.

c. Emission Limitation:

PM<sub>10</sub>/PM<sub>2.5</sub> emissions shall not exceed 0.20 g/kW-hr, 0.10 lb/hr, and 0.025 ton per rolling, 12-month period.

Applicable Compliance Method:

The g/kW-hr limitation is based on manufacturer's emissions data. The hourly emission limitation was developed by multiplying the maximum operating load (223.8 kW) by the PM<sub>10</sub>/PM<sub>2.5</sub> emission factor supplied by the manufacturer (0.20 g/kW-hr) divided by (454 g/lb) to determine the hourly emissions.

If required, the permittee shall demonstrate compliance with the g/kW-hr limitation and hourly emission limitation using Methods 201 or 201A and 202 of



40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the hourly emission limitation (0.10 lb/hr) by the maximum annual operating hours (500 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is shown.

d. Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 0.003 lb/hr and 8.0E-04 ton/yr.

Applicable Compliance Method:

The hourly emission limitation is based dividing the AP-42 emission factor for SO<sub>2</sub> from AP-42 Table 3.4-1 dated 10/96 when burning diesel fuel with a maximum sulfur content of 15 ppmw (0.0015 lb/mmBtu) by (10<sup>6</sup> Btu/mmBtu) multiplied by (7,000 Btu/hp-hr) and multiplied by the maximum power rating (300 hp).

If required, the permittee shall demonstrate compliance with the hourly emission limitation using Methods 1 thru 4 and 6C of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The annual emission limitation was developed by multiplying the hourly emission limitation (0.003 lb/hr) by the maximum annual operating hours (500 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is shown.

e. Emission Limitation:

VOC emissions shall not exceed 0.50 g/kW-hr, 0.25 lb/hr, and 0.06 ton/yr as a rolling, 12-month summation of the monthly emissions.

Applicable Compliance Method:

The g/kW-hr limitation is based on the combined NO<sub>x</sub> + NMHC emission limitation specified by the Table 2 to 40 CFR Part 60, Subpart IIII (4.0 g/kW-hr) multiplied by the Tier 1 emission limitation for NMHC in Table 1 to 40 CFR 89.112(a) (1.3 g/kW-hr) divided by the sum of the Tier 1 emission limitations for NO<sub>x</sub> and HC in Table 1 to 40 CFR 89.112(a) (9.2 g/kW-hr + 1.3 g/kW-hr). The hourly emission limitation was developed by multiplying the maximum operating load (223.8 kW) by the g/kW-hr VOC emission limitation (0.50 g/kW-hr) divided by (454 g/lb) to determine the hourly emissions.

If required, the permittee shall demonstrate compliance with the g/kW-hr limitation and hourly emission limitation using Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S.



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

The annual emission limitation was developed by multiplying the hourly emission limitation (0.24 lb/hr) by the maximum annual operating hours (500 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is shown.

f. Emission Limitation:

H<sub>2</sub>SO<sub>4</sub> emissions shall not exceed 1.32E-04 g/kW-hr, 6.5 E-05 lb/hr and 1.6E-05 ton per rolling, 12-month period.

Applicable Compliance Method:

The g/kW-hr emission is based on the sulfuric acid mist emission factor from page 276 of Toxic Air Pollution Emission Factors, EPA 450/2-90-011 (8.9 ng/J x %sulfur in fuel = 8.9(0.0015) = 0.01335 ng/J). The H<sub>2</sub>SO<sub>4</sub> emission factor (0.01335 ng/J) was converted to g/kW-hr by multiplying by (1055.1 J/Btu), multiplying by (7000 Btu/hp-hr), multiplying by (g/10<sup>9</sup> ng), and multiplying by (1.341 hp/kW) = 1.32E-04 g/kW-hr.

The pound per hour emissions limitation was developed by multiplying the g/kW-hr allowable H<sub>2</sub>SO<sub>4</sub> emission limitation (1.32E-04 g/kW-hr) by the maximum operating load (223.8 kW) and divided by 454 grams per pound to determine the hourly emissions (6.5E-05 lb/hr).

If required, the permittee shall demonstrate compliance with the g/kW-hr and lb/hr emission limitation using Methods 1 thru 4 and 8 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

The ton per year emission limitation was developed by multiplying the hourly allowable H<sub>2</sub>SO<sub>4</sub> emission limitation (6.5E-05 lb/hr) by the maximum annual hours of operation (500 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

g. Emission Limitation:

Carbon dioxide equivalent (CO<sub>2</sub>e) emissions shall not exceed 87 tons per rolling, 12-month period.

Applicable Compliance Method:

This emissions limitation was established to reflect the potential to emit for this emissions unit by calculating the sum of the maximum capacity (300 hp) by the emission factor for CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub>, multiplied by the global warming potential for CO<sub>2</sub>, N<sub>2</sub>O, and CH<sub>4</sub> (1, 310, and 21, respectively from Table A-1 to Subpart of 40 CFR 98). Multiply the sum by the maximum annual hours of operation (500



hrs/yr) and divide by 2,000 pounds per ton. The CO<sub>2</sub> emission factor was obtained from AP-42 Table 3.3-1 dated 10/96 (1.15 lb/hp-hr). The N<sub>2</sub>O emission factor was obtained from Table C-2 to Subpart C of 40 CFR 98 (0.6 g/mmBtu). The CH<sub>4</sub> emission factor was obtained from AP-42 Table 3.3-1 dated 10/96 (2.47E-03 lb TOC/hp-hr (0.09 lb CH<sub>4</sub>/lb TOC)= 2.223E-04 lb CH<sub>4</sub>/hp-hr, this table did not include an estimate of how much methane comprises the TOC emission factor, so the value of 9% from AP-42 Table 3.4-1 dated 10/96 was used).

$$\begin{aligned} & (300 \text{ hp}) \times \left[ \left( 1.15 \frac{\text{lb}}{\text{hp-hr}} (1) \right) \right. \\ & \quad + \left( \left( 0.6 \frac{\text{g}}{\text{mmBtu}} \right) \left( 7000 \frac{\text{Btu}}{\text{hp-hr}} \right) \left( \frac{\text{mmBtu}}{1 \text{E}06 \text{Btu}} \right) \left( \frac{\text{lb}}{454 \text{g}} \right) (310) \right) \\ & \quad \left. + \left( 2.223 \text{E} - 04 \frac{\text{lb}}{(\text{hp-hr})} \right) (21) \right] \times \left( 500 \frac{\text{hrs}}{\text{hr}} \right) \times \left( \frac{\text{ton}}{2,000 \text{lb}} \right) \\ & = 87 \text{ tons/yr} \end{aligned}$$

Since the CO<sub>2</sub>e emissions are estimated to consist of more than 99% CO<sub>2</sub>, compliance with this emission limitation will be assumed provided that the lb/hp-hr CO<sub>2</sub> emission rate does not exceed 1.15 lb/hp-hr. If required, the permittee shall conduct emissions testing using Methods 1, 2, 3A and 4 of 40 CFR Part 60, Appendix A to determine the lb/hp-hr CO<sub>2</sub> emission rate.

h. Emission Limitation:

The permittee shall only combust diesel fuel in this emissions unit meeting the following per gallon standard: 15 ppm maximum sulfur content

Applicable Compliance Method:

The records required by d)(2) shall be used to demonstrate compliance.

i. Emission Limitation:

The permittee shall only combust diesel fuel in this emissions unit meeting the following per gallon standard: a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent.

Applicable Compliance Method:

The records required by d)(2) and d)(3) shall serve as demonstration of compliance.

j. Emission Limitation:

Visible particulate emissions from the stack serving this emissions unit shall not exceed 20 percent opacity as a 6-minute average.



Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emissions limitation according to Method 9 of 40 CFR Part 60, Appendix A.

k. Emission Limitation:

NMHC + NO<sub>x</sub> emissions shall not exceed 4.0 g/kW-hr (3.0 g/hp-hr);

CO emissions shall not exceed 3.5 g/kW-hr (2.6 g/hp-hr); and

PM emissions shall not exceed 0.20 g/kW-hr (0.15 g/hp-hr)

Applicable Compliance Method:

According to 40 CFR 60.4211(c), the permittee shall demonstrate compliance with these emissions limitations by purchasing an engine certified to the emission standards in 40 CFR 60.4205(c) for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in 40 CFR 60.4211(g).

g) Miscellaneous Requirements

(1) None.



**4. P005, Wet Cooling Tower**

**Operations, Property and/or Equipment Description:**

16 cell mechanical draft wet cooling tower with high efficiency drift eliminator

- a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only.

(1) None.

- b) Applicable Emissions Limitations and/or Control Requirements

- (1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	see b)(2)a. and b.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006	see b)(2)c.
c.	OAC rules 3745-10 through 20 (Prevention of Significant Deterioration of Air Quality)	<p>Particulate matter emissions less than 10 microns in diameter (PM<sub>10</sub>) shall not exceed 1.03 pounds per hour and 4.5 tons per rolling, 12-month period.</p> <p>Particulate matter emissions less than 2.5 microns in diameter (PM<sub>2.5</sub>) shall not exceed 3.4E-03 pound per hour and 0.015 ton per rolling, 12-month period.</p> <p>The permittee shall install a drift eliminator with a maximum drift rate of 0.0005% on this emissions unit.</p> <p>Visible particulate emissions shall not exceed 10% opacity as a 6-minute average. The presence of condensed water vapor shall not be deemed a violation for failure of stack emissions meeting this visible emission limitation.</p> <p>see c)(1)</p>
d.	OAC rule 3745-17-07(A)(1)	see b)(2)d.
e.	OAC rule 3745-17-11(B)	see b)(2)d.



(2) Additional Terms and Conditions

- a. The requirements of this rule include compliance with the requirements of OAC rule 3745-10 through 20.
- b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by 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 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.
- c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM<sub>10</sub> and PM<sub>2.5</sub> emissions from this air contaminant source since the calculated annual emission rate for PM<sub>10</sub> and PM<sub>2.5</sub> is less than 10 tons per year taking into account the federally enforceable rule limit of 0.0005% drift and a maximum TDS concentration of 2,030.5 mg/l under OAC rule 3745-31-10 through 20.

- d. The emission limitation specified by this rule is less stringent than the emission limitation established by OAC rule 3745-31-10 through 20.

c) Operational Restrictions

- (1) The permittee shall maintain the total dissolved solids (TDS) concentration of the cooling water less than or equal to 2,030.5 milligrams per liter.

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall properly install, operate, and maintain a conductivity meter or other equipment to continuously monitor and record the TDS concentration of the cooling tower water. The monitoring devices shall be installed, calibrated, operated, and maintained in accordance with the manufacturer's recommendations, instructions, and operating manuals.
- (2) Since the TDS data measured by TDS monitors is based on a correlation between conductivity and TDS, an exceedance measured by the TDS monitor is not a violation of the TDS operational restriction, but rather serves as an indicator to initiate corrective action by the permittee to reduce the TDS concentration..



e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify all TDS readings in excess of 2030.5 mg/l. The reports shall identify corrective action taken to reduce the TDS concentration.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit

- (2) Prior to startup, the permittee shall submit written documentation provided by the vendor/manufacturer, of the maximum drift rate of 0.0005% for the drift eliminator and the premise, basis, and justification for the drift rate.
- (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

PM<sub>10</sub> emissions shall not exceed 1.03 lbs/hr and 4.5 tons per rolling, 12-month period.

Applicable Compliance Method:

The lb/hr PM<sub>10</sub> emission limitation is based on multiplying the maximum re-circulating water flow rate (322,000 gal/min) by the maximum TDS concentration (2030.5/1E06) multiplied by the decimal fraction drift rate (0.000005) multiplied by the density of water (8.34 lbs/gal) multiplied by (60 min/hr) and multiplied by the decimal fraction of PM<sub>10</sub> contained in the TDS (0.63). The permittee calculated the PM<sub>10</sub> fraction using AWMA Abstract No. 216, Session No. AM-1b, Orlando, 2001.

The annual emission limitation is based on multiplying the hourly emission limitation (1.03 lbs/hr) by the maximum annual hours of operation (8,760 hrs/yr) and dividing by (2,000 lbs/ton)

Compliance with the hourly and annual emissions limitation will be assumed provided that the TDS concentration recorded in d) remains below 2030.5 mg/l.

b. Emission Limitation:

PM<sub>2.5</sub> emissions shall not exceed 3.4E-03 lb/hr and 0.015 ton/yr

The lb/hr PM<sub>2.5</sub> emission limitation is based on multiplying the maximum re-circulating water flow rate (322,000 gal/min) by the maximum TDS concentration





(2030.5/1E06) multiplied by the decimal fraction drift rate (0.000005) multiplied by the density of water (8.34 lbs/gal) multiplied by (60 min/hr) and multiplied by the decimal fraction of PM<sub>2.5</sub> contained in the TDS (0.0021). The permittee calculated the PM<sub>2.5</sub> fraction using AWMA Abstract No. 216, Session No. AM-1b, Orlando, 2001.

The annual emission limitation is based on multiplying the hourly emission limitation (3.4E-03 lb/hr) by the maximum annual hours of operation (8,760 hrs/yr) and dividing by (2,000 lbs/ton)

Compliance with the hourly and annual emissions limitation will be assumed provided that the TDS concentration recorded in d) remains below 2030.5 mg/l.

c. Emission Limitation:

The maximum drift rate shall not exceed 0.0005%.

Applicable Compliance Method:

Manufacturer's emissions data shall be used to demonstrate compliance with this limitation.

Within 90 days of startup, the permittee shall submit to the Toledo Division of Environmental Services written documentation provided by the vendor/manufacturer, of the maximum drift rate of 0.0005% for the drift eliminator and the premise, basis, and justification for the drift rate.

d. Emission Limitation:

The permittee shall maintain the TDS concentration of the cooling water less than or equal to 2,030.5 milligrams per liter.

Applicable Compliance Method:

The monitoring and recordkeeping requirements under d)(1) and d)(2) shall serve as demonstration of compliance.

If required, compliance shall be demonstrated using test procedures that conform to regulation 40 CFR 136, "Test Procedures For The Analysis of Pollutants". Alternative U.S. EPA approved test methods may be used with prior written approval from the Ohio EPA.

g) Miscellaneous Requirements

(1) None.



**5. Emissions Unit Group -P001 and P002: CTG #1 and CTG #2**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
P001	Mitsubishi M501GAC or Siemens SCC6-8000H combined cycle combustion turbine (2,932 mmBtu/hr heat input turbine and 300 mmBtu/hr heat input duct burner) with dry low NOx combustors, selective catalytic reduction (SCR), and catalytic oxidizer.
P002	Mitsubishi M501GAC or Siemens SCC6-8000H combined cycle combustion turbine (2,932 mmBtu/hr heat input turbine and 300 mmBtu/hr heat input duct burner) with dry low NOx combustors, selective catalytic reduction (SCR), and catalytic oxidizer.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) d)(12) through d)(15) and e)(6).

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	ORC 3704.03(T)	Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 1.4E-03 lb/mmBtu of heat input.  see b)(2)b.
b.	OAC rule 3745-31-05(D)	The combined SO <sub>2</sub> emissions from P001 and P002 shall not exceed 34.2 tons per rolling 12-month period if Mitsubishi turbines are installed and 36.8 tons per rolling, 12-month period if Siemens turbines are installed.  see b)(2)e. and f.
c.	OAC rule 3745-31-10 through 20	Visible particulate emissions from the stack serving this emissions unit shall not exceed 10 percent opacity as a 6-minute average.  Carbon dioxide equivalent (CO <sub>2</sub> e) emissions from the Mitsubishi turbine shall not exceed 840 lb/MW-hr gross energy output and 318,404 lbs/hr.



	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		Carbon dioxide equivalent (CO <sub>2</sub> e) emissions from the Siemens turbine shall not exceed 833 lb/MW-hr gross energy output and 327,819 lbs/hr.  see b)(2)c., b)(2)d., b)(2)g. through b)(2)n., and b)(2)v. through x.
d.	OAC rule 3745-17-07(A)	see b)(2)o.
e.	OAC rule 3745-17-11(B)(4)	see b)(2)o.
f.	OAC rule 3745-18-06(A)	see b)(2)q.
g.	OAC rule 3745-110-03(J)(19)	Exemption
h.	OAC rule 3745-114	see d)(12) through d)(15)
i.	40 CFR Part 60, Subpart A	see b)(2)r.
j.	40 CFR Part 60, Subpart KKKK (40 CFR 60.4300 – 60.4420)  [In accordance with 40 CFR 60.4305(a), this emissions unit is a stationary combustion turbine with a heat input at peak load greater than 10 mmBtu/hr with a heat recovery steam generator/duct burners subject to the emissions limitations/control measures specified in this section.]	see b)(2)p. and b)(2)s.
k.	40 CFR Part 63, Subpart YYYY	see b)(2)t.
l.	40 CFR Part 63, Subpart JJJJJJ	see b)(2)u.

(2) Additional Terms and Conditions

- a. All requirements specified for in this Section of the permit for Emissions Unit Group P001 and P002 apply to each combined cycle combustion turbine (P001 and P002) unless a combined requirement is otherwise specified.
- b. Compliance with the requirements of this rule for CO, NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC includes compliance with the requirements of OAC rule 3745-31-10 through 20.
- c. The emissions from this emissions unit shall be vented to the SCR and catalytic oxidation units at all times during which the emissions unit is in operation.
- d. All particulate emissions are assumed to be less than 2.5 microns in diameter. The PM<sub>10</sub>/PM<sub>2.5</sub> emissions limitations include both filterable and condensable particulate emissions.
- e. The sulfur content of natural gas burned in this emissions unit shall not exceed 0.5 grains per 100 standard cubic feet.



- f. The combined natural gas usage by emissions units P001 and P002 shall not exceed 47,917 mmscf per rolling, 12-month period if Mitsubishi turbines are installed and 51,560 mmscf per rolling, 12-month period if Siemens turbines are installed. To ensure enforceability during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the natural gas usage levels specified in the following table:

Month(s)	Maximum Allowable Cumulative Natural Gas Usage by P001 and P002 combined (Million Standard Cubic Feet)	
	mmscf, if Mitsubishi turbines are installed	mmscf, if Siemens turbines are installed
1	7,986	8,593
1-2	15,972	17,187
1-3	23,959	25,780
1-4	31,945	34,373
1-5	39,931	42,967
1-6	47,917	51,560
1-7	47,917	51,560
1-8	47,917	51,560
1-9	47,917	51,560
1-10	47,917	51,560
1-11	47,917	51,560
1-12	47,917	51,560

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

- g. The permittee shall comply with the following emissions limitations if a Mitsubishi turbine is installed:



Allowable Emissions if Mitsubishi Turbine is Installed				
Pollutant	Operating Mode <sup>a</sup>	Emission Rate <sup>b,e</sup>	Emission rate, lb/hr <sup>b</sup>	Emission rate, tons per rolling, 12-month period
CO	CT with DB	2.0 <sup>c</sup>	12.7	-
	CT only	2.0 <sup>c</sup>	13.7	-
	All operating modes, including startup periods	-	-	183.9
NOx	CT with DB	2.0 <sup>c</sup>	20.8	-
	CT only	2.0 <sup>c</sup>	22.6	-
	All operating modes, including startup periods			94.8
PM <sub>10</sub> /PM <sub>2.5</sub>	CT with DB	3.73E-03 <sup>d</sup>	10.1	-
	CT only	3.84E-03 <sup>d</sup>	11.3	-
	All operating modes, including startup periods	-	-	44.2
VOC	CT With DB	2.0 <sup>c</sup>	7.3	-
	CT only	2.0 <sup>c</sup>	7.9	-
	All operating modes, including startup periods	-	-	56.0
H <sub>2</sub> SO <sub>4</sub>	CT only	4.1E-04 <sup>d</sup>	1.2	-
	CT with DB	4.4E-04 <sup>d</sup>	1.2	-
	All operating modes, including startup periods	-	-	5.26
CO <sub>2</sub> e	All operating modes, including startup periods	-	-	1,394,611



<b>Allowable Emissions if Mitsubishi Turbine is Installed</b>				
<b>Pollutant</b>	<b>Operating Mode<sup>a</sup></b>	<b>Emission Rate<sup>b,e</sup></b>	<b>Emission rate, lb/hr<sup>b</sup></b>	<b>Emission rate, tons per rolling, 12-month period</b>
a. CT = combustion turbine DB = duct burner b. Emission limitation does not apply during periods of startup and shutdown. c. Parts per million by volume dry (ppmvd) at 15% oxygen d. Pound per million Btu of heat input e. Emissions limitations are based on an hourly average.				

- h. To ensure enforceability of the rolling, 12-month emissions limitations during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

<b>Maximum Allowable Cumulative Emissions if a Mitsubishi turbine is installed (Tons)</b>					
<b>Month(s)</b>	<b>CO</b>	<b>NOx</b>	<b>PM10/PM2.5</b>	<b>VOC</b>	<b>H<sub>2</sub>SO<sub>4</sub></b>
1	30.7	15.8	7.4	9.3	0.88
1-2	61.3	31.6	14	18.7	1.75
1-3	92.0	47.4	22.1	28.0	2.63
1-4	122.6	63.2	29.5	37.3	3.51
1-5	153.3	79.0	36.8	46.7	4.38
1-6	183.9	94.8	44.2	56.0	5.26
1-7	183.9	94.8	44.2	56.0	5.26
1-8	183.9	94.8	44.2	56.0	5.26
1-9	183.9	94.8	44.2	56.0	5.26
1-10	183.9	94.8	44.2	56.0	5.26
1-11	183.9	94.8	44.2	56.0	5.26
1-12	183.9	94.8	44.2	56.0	5.26



After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emissions limitations shall be based upon a rolling, 12-month summation of the monthly emissions.

- i. The permittee shall comply with the following requirements during periods of startup and shutdown if a Mitsubishi turbine is installed.

	Emissions Limitations During Startup (lbs/hr) <sup>a</sup>			
	Cold Startup	Hot Startup	Warm Startup	Shutdown
<b>CO</b>	1106.72	578.5	973.42	263
<b>NO<sub>x</sub></b>	43.56	46.93	42.27	35
<b>VOC</b>	339.4	109.34	314.07	111
<sup>a</sup> Pound per hour emissions rates as presented are averaged over the duration of the event where the duration of a cold start is 150 minutes, the duration of a warm start is 110 minutes, the duration of a hot start is 67 minutes, and the duration of a shutdown is less than 1 hour.				

“Cold Startup” is defined as a combustion turbine startup that occurs more than 60 hours after a combustion turbine shutdown. The period of startup is defined as the lesser of the first 150 minutes of continuous fuel flow to the combustion turbine after fuel flow is initiated or the period of time from combustion turbine fuel flow initiation until the combustion turbine achieves ten consecutive CEM data points in compliance with the ppmvd emissions limitations for CO and NO<sub>x</sub>.

“Hot Startup” is defined as a combustion turbine startup that occurs within 8 hours of a combustion turbine shutdown. The period of hot startup is defined as the lesser of the first 67 minutes of continuous fuel flow to the combustion turbine after fuel flow is initiated or the period of time from combustion turbine fuel flow initiation until the combustion turbine achieves ten consecutive CEM data points in compliance with the ppmvd emissions limitations for CO and NO<sub>x</sub>.

“Warm Startup” is defined as a combustion turbine startup that occurs between 8 hours of and 60 hours of a combustion turbine shutdown. The period of startup is defined as the lesser of the first 110 minutes of continuous fuel flow to the combustion turbine after fuel flow is initiated or the period of time from combustion turbine fuel flow initiation until the combustion turbine achieves ten consecutive CEM data points in compliance with the ppmvd emissions limitations for CO and NO<sub>x</sub>.



- j. The design net plant base heat rate with the Mitsubishi turbine shall not exceed 7,280 Btu/kW-hr HHV (ISO conditions without duct firing).
- k. The permittee shall comply with the following emissions limitations if a Siemens turbine is installed:

<b>Allowable Emissions if Siemens Turbine is Installed</b>				
<b>Pollutant</b>	<b>Operating Mode<sup>a</sup></b>	<b>Emission Rate<sup>b,e</sup></b>	<b>Emission rate, lb/hr<sup>b</sup></b>	<b>Emission rate, tons per rolling, 12-month period</b>
CO	CT with DB	2.0 <sup>c</sup>	13.0	-
	CT only	2.0 <sup>c</sup>	13.0	-
	All operating modes, including startup periods	-	-	72.2
NOx	CT with DB	2.0 <sup>c</sup>	21.0	-
	CT only	2.0 <sup>c</sup>	22.0	-
	All operating modes, including startup periods			92.0
PM <sub>10</sub> /PM <sub>2.5</sub>	CT with DB	5.5E-03 <sup>d</sup>	14.0	-
	CT only	4.7E-03 <sup>d</sup>	13.3	-
	All operating modes, including startup periods	-	-	61.3
VOC	CT With DB	1.9 <sup>c</sup>	5.9	-
	CT only	1.0 <sup>c</sup>	3.9	-
	All operating modes, including startup periods	-	-	28.6
H <sub>2</sub> SO <sub>4</sub>	CT with DB	7.0E-04 <sup>d</sup>	1.5	-
	CT only	6.0E-04 <sup>d</sup>	1.6	-
	All operating modes, including			





Allowable Emissions if Siemens Turbine is Installed				
Pollutant	Operating Mode <sup>a</sup>	Emission Rate <sup>b,e</sup>	Emission rate, lb/hr <sup>b</sup>	Emission rate, tons per rolling, 12-month period
	startup periods	-	-	6.57
CO <sub>2</sub> e	All operating modes, including startup periods	-	-	1,435,847
a. CT = combustion turbine DB = duct burner b. Limitation does not apply during periods of startup and shutdown. c. Parts per million by volume dry (ppmvd) at 15% oxygen d. Pound per million Btu of heat input e. Emissions limitations are based on an hourly average.				

- I. To ensure enforceability of the rolling, 12-month emissions limitations during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall not exceed the emission levels specified in the following table:

Maximum Allowable Cumulative Emissions if a Siemens turbine is installed (Tons)					
Month(s)	CO	NOx	PM10/PM2.5	VOC	H <sub>2</sub> SO <sub>4</sub>
1	12.0	15.3	10.2	4.8	1.10
1-2	24.1	30.7	20.4	9.5	2.19
1-3	36.1	46.0	30.7	14.3	3.29
1-4	48.1	61.3	40.9	19.1	4.3
1-5	60.2	76.7	51.1	23.8	5.48
1-6	72.2	92.0	61.3	28.6	6.57
1-7	72.2	92.0	61.3	28.6	6.57
1-8	72.2	92.0	61.3	28.6	6.57
1-9	72.2	92.0	61.3	28.6	6.57



	Maximum Allowable Cumulative Emissions if a Siemens turbine is installed (Tons)				
Month(s)	CO	NOx	PM10/PM2.5	VOC	H <sub>2</sub> SO <sub>4</sub>
1-10	72.2	92.0	61.3	28.6	6.57
1-11	72.2	92.0	61.3	28.6	6.57
1-12	72.2	92.0	61.3	28.6	6.57

After the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, compliance with the annual emissions limitations shall be based upon a rolling, 12-month summation of the monthly emissions.

- m. The permittee shall comply with the following requirements during periods of startup and shutdown if a Siemens turbine is installed.

Emissions Limitations During Startup and Shutdown (lbs/hr) <sup>a</sup>				
	Cold Startup	Hot Startup	Warm Startup	Shutdown
<b>CO</b>	182.0	211.46	214.90	113
<b>NOx</b>	62.67	76.83	78.98	46
<b>VOC</b>	56.0	83.41	84.49	44
<sup>a</sup> Pound per hour emissions rates as presented are averaged over the duration of the event where the duration of a cold start is 180 minutes, the duration of a warm start is 98 minutes, the duration of a hot start is 82 minutes, and the duration of a shutdown is less than 1 hour.				

“Cold Startup” is defined as a combustion turbine startup that occurs more than 64 hours after a combustion turbine shutdown. The period of startup is defined as the lesser of the first 180 minutes of continuous fuel flow to the combustion turbine after fuel flow is initiated or the period of time from combustion turbine fuel flow initiation until the combustion turbine achieves ten consecutive CEM data points in compliance with the ppmvd emissions limitations for CO and NO<sub>x</sub>.

“Hot Startup” is defined as a combustion turbine startup that occurs within 16 hours of a combustion turbine shutdown. The period of hot startup is defined as



the lesser of the first 82 minutes of continuous fuel flow to the combustion turbine after fuel flow is initiated or the period of time from combustion turbine fuel flow initiation until the combustion turbine achieves ten consecutive CEM data points in compliance with the ppmvd emissions limitations for CO and NO<sub>x</sub>.

“Warm Startup” is defined as a combustion turbine startup that occurs between 16 hours of and 64 hours of a combustion turbine shutdown. The period of startup is defined as the lesser of the first 98 minutes of continuous fuel flow to the combustion turbine after fuel flow is initiated or the period of time from combustion turbine fuel flow initiation until the combustion turbine achieves ten consecutive CEM data points in compliance with the ppmvd emissions limitations for CO and NO<sub>x</sub>.

- n. The design net plant base heat rate with the Siemens turbine shall not exceed 7,227 Btu/kW-hr HHV (ISO conditions without duct firing).
- o. The emission limitation specified by this rule is less stringent than the limitation established by OAC rule 3745-31-10 through 20.
- p. The emission limitation specified by this rule is less stringent than the limitation established by ORC 3704.03(T).
- q. This emissions unit is exempt from the requirements of this rule, since only natural gas is burned.
- r. 40 CFR Part 60 subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to emissions units affected by 40 CFR Part 60.
- s. This emissions unit is subject to the applicable provisions of Subpart KKKK of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60. The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable.
- t. This emissions unit is not subject to the requirements of 40 CFR Part 63, Subpart YYYY, since it is not located at a major source of HAP emissions.
- u. The duct burner is exempt from the requirements of this rule per 40 CFR 63.11195(e) due to combusting only natural gas.
- v. Each continuous NO<sub>x</sub> monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6. At least 45 days before commencing certification testing of the continuous NO<sub>x</sub> monitoring system(s), the permittee shall develop and maintain a written quality assurance/quality control plan designed to ensure continuous valid and representative readings of NO<sub>x</sub> emissions from the continuous monitor(s), in units of the applicable standard(s). Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook dedicated



to the continuous monitoring system must be kept on site and available for inspection during regular office hours.

The plan shall include the requirement to conduct relative accuracy test audits for the continuous NO<sub>x</sub> monitoring system in accordance with the frequencies required pursuant to 40 CFR Part 60 and 40 CFR Part 75; or may follow relative accuracy test audit frequency requirements for monitoring systems subject to 40 CFR 75, Appendix B, in lieu of frequencies required in 40 CFR Part 60. In either case, results shall be recorded and reported in units of the applicable standard(s) in accordance with 40 CFR Part 60.

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

- w. Each continuous carbon monoxide (CO) monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 4 or 4a and 6. At least 45 days before commencing certification testing of the continuous CO monitoring system(s), the permittee shall develop and maintain a written quality assurance/quality control plan designed to ensure continuous valid and representative readings of CO emissions from the continuous monitor(s), in units of the applicable standard(s). The fuel flow monitor/meter shall be maintained as required in Part 75, Appendix D. Except as allowed below, 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 monitoring system must be kept on site and available for inspection during regular office hours.

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

The plan shall include the requirement to conduct quarterly cylinder gas audits or relative accuracy audits as required in 40 CFR Part 60; however, the quarterly cylinder gas audit and relative accuracy audit frequency requirements may be adjusted to coincide with linearity checks completed for continuous emissions monitoring systems subject to 40 CFR Part 75, Appendix B requirements.

- x. The continuous emission monitoring system consists of all the equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.



c) Operational Restrictions

- (1) The permittee shall only burn pipeline quality natural gas as fuel in this emissions unit.
- (2) To ensure compliance with the PSD modeling, the permittee shall not operate more than one combustion turbine in startup mode at a time.
- (3) See 40 CFR Part 60, Subpart KKKK (40 CFR 60.4300 – 60.4420)

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (2) For purposes of demonstrating compliance with the natural gas sulfur concentration restriction of 0.5 grain/dscf, the permittee shall sample and analyze the natural gas burned in this emissions unit monthly to determine the sulfur content using the appropriate ASTM or Gas Processors Association standards. Fuel supplier data may be used to comply with this requirement, provided that it is demonstrated to be representative of the fuel received for burning at this emissions unit.
- (3) The permittee may elect not to monitor the total sulfur content of the fuel combusted in the turbine as specified in d)(2), if the fuel is demonstrated not to exceed potential sulfur emissions of 1.4E-03 lb SO<sub>2</sub>/mmBtu. The permittee shall use one of the following sources of information to make the required demonstration:
  - a. the fuel quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the fuel, specifying that the maximum total sulfur content for natural gas is 0.5 grains of sulfur or less per 100 standard cubic feet, has potential sulfur emissions of less than less than 1.4E-03 lb SO<sub>2</sub>/mmBtu heat input;
  - b. representative fuel sampling data which show that the sulfur content of the fuel does not exceed 1.4E-03 lb SO<sub>2</sub>/mmBtu heat input. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of appendix D to part 75 of this chapter is required; or
  - c. one of the custom sulfur monitoring schedules outlined in 40 CFR 60.4370(c) may be used to comply with the 1.4E-03 lb SO<sub>2</sub>/mmBtu standard.
- (4) The permittee shall maintain monthly records of the following information:
  - a. the natural gas usage by P001 and P002 for each month;
  - b. the combined natural gas usage by P001 and P002 for each month; and
  - c. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the combined natural gas usage by P001 and P002.



Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative combined natural gas usage by P001 and P002 for each calendar month.

- (5) The permittee shall maintain monthly records of the following information:
- a. the CO, NO<sub>x</sub>, PM<sub>10</sub>/PM<sub>2.5</sub>, VOC, and H<sub>2</sub>SO<sub>4</sub> emission rate for each month of operations; and
  - b. beginning after the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the rolling, 12-month summation of the CO, NO<sub>x</sub>, PM<sub>10</sub>/PM<sub>2.5</sub>, VOC, and H<sub>2</sub>SO<sub>4</sub> emissions.

Also, during the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, the permittee shall record the cumulative CO, NO<sub>x</sub>, PM<sub>10</sub>/PM<sub>2.5</sub>, VOC, and H<sub>2</sub>SO<sub>4</sub> emissions for each calendar month.

- (6) The permittee shall maintain monthly records of the following information for this emissions unit for purposes of calculating rolling, 12-month emissions:
- a. date, time, and duration of each cold, warm, hot startup and shutdown period;
  - b. the hours of operation of the combustion turbine;
  - c. the hours of operation of the duct burner;
  - d. the total duration of all cold startup periods in hours per rolling, 12-month period;
  - e. the total duration of all hot startup periods in hours per rolling, 12-month period;
  - f. the total duration of all warm startup periods in hours per rolling, 12-month period;
  - g. the total duration of all shutdown periods in hours per rolling, 12-month period;
  - h. the total duration of steady-state operation without duct burner firing in hours per rolling, 12-month period;
  - i. the total duration of steady-state operation with duct burner firing in hours per rolling, 12-month period;
- (7) Prior to the installation of the continuous NO<sub>x</sub> 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. The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous NO<sub>x</sub> monitoring system meets the requirements of Performance Specifications 2 and 6; and the U.S. EPA shall certify that the continuous NO<sub>x</sub> monitoring system meets the requirements under 40 CFR Part 75, which may be approved through the recommendation for certification by Ohio EPA to U.S. EPA. Once



received, the letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be maintain on-site and made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

- (8) The permittee shall install, operate, and maintain equipment to continuously monitor and record NO<sub>x</sub> emissions from this emissions unit in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60 and 40 CFR Part 75.

The permittee shall maintain records of all data obtained by the continuous NO<sub>x</sub> monitoring system including, but not limited to:

- a. emissions of NO<sub>x</sub> in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. emissions of NO<sub>x</sub> in pounds per hour and in units of the applicable standard(s) in the appropriate averaging period;
- c. results of quarterly cylinder gas audits or linearity checks;
- d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. hours of operation of the emissions unit, continuous NO<sub>x</sub> monitoring system, and control equipment;
- g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous NO<sub>x</sub> monitoring system;
- h. malfunction of the control equipment and/or the continuous NO<sub>x</sub> monitoring system; as well as,
- i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

- (9) Prior to the installation of the continuous carbon monoxide (CO) 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 4 or 4a (as appropriate). The Ohio EPA, Central Office shall approve the proposed sampling site and certify that the continuous CO monitoring system meets the



requirements of Performance Specifications 4 or 4a and 6. Once received, the letter(s)/document(s) of certification shall be maintained on-site and shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

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

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

- a. emissions of CO in parts per million for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. emissions of CO in pounds per hour and in units of the applicable standard(s) in the appropriate averaging period;
- c. results of quarterly cylinder gas audits;
- d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- e. results of required relative accuracy test audit(s), including results in units of the applicable standard(s);
- f. hours of operation of the emissions unit, continuous CO monitoring system, and control equipment;
- g. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous CO monitoring system;
- h. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous CO monitoring system; as well as,
- i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

All valid data points generated and recorded by the continuous emission monitoring and data acquisition and handling system shall be used in the calculation of the pollutant concentration and/or emission rate over the appropriate averaging period.

- (11) The permittee shall calculate and record the monthly CO<sub>2</sub> emissions from P001 and P002 using data from the continuous flow and moisture content monitors using the procedures set forth in 40 CFR Part 75, Appendix G. From this data, the permittee shall calculate the CO<sub>2</sub> emissions from P001 and P002 per rolling, 12-month period.





(12) The Permit to Install application for these emissions units, P001 and P002, was evaluated based on the actual materials and the design parameters of the emissions unit's(s') exhaust system, as specified by the permittee. The "Toxic Air Contaminant Statute", ORC 3704.03(F), was applied to this/these emissions unit(s) for each toxic air contaminant listed in OAC rule 3745-114-01, using data from the permit application; and modeling was performed for each toxic air contaminant(s) emitted at over one ton per year using an air dispersion model such as SCREEN3, AERMOD, or ISCST3, or other Ohio EPA approved model. The predicted 1-hour maximum ground-level concentration result(s) from the approved air dispersion model, was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC), calculated as described in the Ohio EPA guidance document entitled "Review of New Sources of Air Toxic Emissions, Option A", as follows:

- a. the exposure limit, expressed as a time-weighted average concentration for a conventional 8-hour workday and a 40-hour workweek, for each toxic compound(s) emitted from the emissions unit(s), (as determined from the raw materials processed and/or coatings or other materials applied) has been documented from one of the following sources and in the following order of preference (TLV was and shall be used, if the chemical is listed):
  - i. threshold limit value (TLV) from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; or
  - ii. STEL (short term exposure limit) or the ceiling value from the American Conference of Governmental Industrial Hygienists (ACGIH) "Threshold Limit Values for Chemical Substances and Physical Agents Biological Exposure Indices"; the STEL or ceiling value is multiplied by 0.737 to convert the 15-minute exposure limit to an equivalent 8-hour TLV.
- b. The TLV is divided by ten to adjust the standard from the working population to the general public (TLV/10).
- c. This standard is/was then adjusted to account for the duration of the exposure or the operating hours of the emissions unit(s), i.e., "X = 24" hours per day and "Y = 7" days per week, from that of 8 hours per day and 5 days per week. The resulting calculation was (and shall be) used to determine the Maximum Acceptable Ground-Level Concentration (MAGLC):

$$\text{TLV}/10 \times 8/X \times 5/Y = 4 \text{ TLV}/XY = \text{MAGLC}$$

- d. The following summarizes the results of dispersion modeling for the "worst case" toxic contaminant(s) if Mitsubishi turbines are installed:

Toxic Contaminant:  $\text{H}_2\text{SO}_4$

TLV (mg/m<sup>3</sup>): 0.2 mg/m<sup>3</sup>

Maximum Hourly Emission Rate (lbs/hr): 1.2



Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 0.329

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 4.76

- e. The following summarizes the results of dispersion modeling for the “worst case” toxic contaminant(s) if Siemens turbines are installed:

Toxic Contaminant:  $\text{H}_2\text{SO}_4$

TLV ( $\text{mg}/\text{m}^3$ ): 0.2

Maximum Hourly Emission Rate ( $\text{lbs}/\text{hr}$ ): 0.7

Predicted 1-Hour Maximum Ground-Level Concentration ( $\mu\text{g}/\text{m}^3$ ): 0.169

MAGLC ( $\mu\text{g}/\text{m}^3$ ): 4.76

The permittee, has demonstrated that emissions of  $\text{H}_2\text{SO}_4$ , from emissions unit(s) P001 and P002, is calculated to be less than eighty per cent of the maximum acceptable ground level concentration (MAGLC); any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

- (13) Prior to making any physical changes to or changes in the method of operation of the emissions unit(s), that could impact the parameters or values that were used in the predicted 1-hour maximum ground-level concentration, the permittee shall re-model the change(s) to demonstrate that the MAGLC has not been exceeded. Changes that can affect the parameters/values used in determining the 1-hour maximum ground-level concentration include, but are not limited to, the following:
- a. changes in the composition of the materials used or the use of new materials, that would result in the emission of a new toxic air contaminant with a lower Threshold Limit Value (TLV) than the lowest TLV 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 toxic air contaminant listed in OAC rule 3745-114-01, that was modeled from the initial (or last) application; and
  - c. physical changes to the emissions unit(s) or its/their exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a “modification” under OAC rule 3745-31-01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the



emissions unit, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

- (14) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F):
- a. a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
  - b. the Maximum Acceptable Ground-Level Concentration (MAGLC) for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the "Toxic Air Contaminant Statute", ORC 3704.03(F);
  - c. a copy of the computer model run(s), that established the predicted 1-hour maximum ground-level concentration that demonstrated the emissions unit(s) to be in compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant emissions; and
  - d. the documentation of the initial evaluation of compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the emissions unit(s) or the materials applied.
- (15) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum ground-level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.
- (16) See 40 CFR Part 60, Subpart KKKK (40 CFR 60.4300 – 60.4420)

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (2) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. Any monthly record showing an exceedance of the allowable sulfur content of natural gas, 0.5 grain per 100 standard cubic feet; and



- b. all exceedances of the rolling, 12-month combined natural gas usage limitation; and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative combined natural gas usage levels.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Terms and Conditions of this permit.

- (3) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous NOx monitoring system:
  - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of NOx emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, 40 CFR Parts 75 and 76, OAC Chapters 3745-14 and 3745-23, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
  - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
    - i. the facility name and address;
    - ii. the manufacturer and model number of the continuous NOx and other associated monitors;
    - iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
    - iv. the excess emissions report (EER)\*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
    - v. the total NOx emissions for the calendar quarter (tons);
    - vi. the total operating time (hours) of the emissions unit;
    - vii. the total operating time of the continuous NOx monitoring system while the emissions unit was in operation;
    - viii. results and date of quarterly cylinder gas audits or linearity checks;
    - ix. unless previously submitted, results and date of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));



- x. unless previously submitted, the results of any relative accuracy test audit showing the continuous NO<sub>x</sub> monitor out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction\*\* of the continuous NO<sub>x</sub> monitoring system, emissions unit, and/or control equipment;
- xii. the date, time, and duration of any downtime\*\* of the continuous NO<sub>x</sub> monitoring system and/or control equipment while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

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

\* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

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

- (4) The permittee shall comply with the following quarterly reporting requirements for the emissions unit and its continuous CO monitoring system:
- a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the appropriate Ohio EPA District Office or local air agency, documenting all instances of CO emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapter 3745-21, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
  - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
    - i. the facility name and address;
    - ii. the manufacturer and model number of the continuous CO and other associated monitors;



- iii. a description of any change in the equipment that comprises the continuous emission monitoring system (CEMS), including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
- iv. the excess emissions report (EER)\*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
- v. the total CO emissions for the calendar quarter (tons);
- vi. the total operating time (hours) of the emissions unit;
- vii. the total operating time of the continuous CO monitoring system while the emissions unit was in operation;
- viii. results and dates of quarterly cylinder gas audits;
- ix. unless previously submitted, results and dates of the relative accuracy test audit(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- x. unless previously submitted, the results of any relative accuracy test audit showing the continuous CO monitor out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction\*\* of the continuous CO monitoring system, emissions unit, and/or control equipment;
- xii. the date, time, and duration of any downtime\*\* of the continuous CO monitoring system and/or control equipment while the emissions unit was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

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

\* where no excess emissions have occurred or the continuous monitoring system(s) has/have not been inoperative, repaired, or adjusted during the calendar quarter, such information shall be documented in the EER quarterly report

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

- (5) The permittee shall collect, record, and maintain measurements, data, records, and reports required per 40 CFR Part 75; and shall submit certification, recertification, notifications, applications, monitoring plans, petitions for alternative monitoring systems,



electronic quarterly reports, and any other pertinent record and/or report to the Administrator (U.S. EPA), as required by this Part.

- (6) The permittee shall submit annual reports that include any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air Contaminate Statute", ORC 3704.03(F), through the predicted 1 hour maximum concentration. The report should include:
- a. the original model input;
  - b. the updated model input;
  - c. the reason for the change(s) to the input parameter(s); and
  - d. a summary of the results of the updated modeling, including the input changes; and
  - e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

If no changes to the emissions, emissions unit(s), or the exhaust stack have been made during the reporting period, then the report shall include a statement to that effect.

- (7) See 40 CFR Part 60, Subpart KKKK (40 CFR 60.4300 – 60.4420)

f) Testing Requirements

- (1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

- a. Emission Limitation:

If a Mitsubishi turbine is installed, CO emissions from this emissions unit shall not exceed 2.0 ppmvd at 15% oxygen as an hourly average and 13.7 lbs/hr when the duct burner is not in operation; and, 2.0 ppmvd at 15% oxygen as an hourly average and 12.7 lbs/hr when the duct burner is in operation.

Applicable Compliance Method:

These emissions limitations are based on manufacturer's data. Ongoing compliance with the CO emission limitations shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the requirements of 40 CFR Part 60.

If required, the permittee shall demonstrate compliance using Methods 1 thru 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.



b. Emission Limitation:

If a Mitsubishi turbine is installed, CO emissions from this emissions unit shall not exceed 183.9 tons per rolling, 12-month period.

Applicable Compliance Method:

This emissions limitation is based on the following anticipated worst case emissions: 50 cold startups per year, with a minimum downtime preceding cold startup of 60 hours and a cold startup duration of 150 minutes, maximum CO emissions of 2,766.8 pounds during each cold startup period; 250 hot startups per year with a of duration of 67 minutes each and maximum CO emissions of 646 pounds during each hot startup period; hourly CO emissions at ISO conditions during steady state operation of 12.7 lbs/hr based on manufacturer's data and steady state operating hours was determined by the following equation.

$$8,760 \text{ hrs} - \left( 50 \left( 60 \text{ hrs} + \frac{150 \text{ min}}{60 \left( \frac{\text{min}}{\text{hr}} \right)} \right) + 250 \left( \frac{67 \text{ min}}{60 \left( \frac{\text{min}}{\text{hr}} \right)} \right) \right) = 5,355.8 \text{ hours}$$

The allowable annual emission rate was determined by the following calculation using the above information.

$$\frac{\left[ \left( 50 \frac{\text{CS}}{\text{yr}} \right) \left( 2,766.8 \frac{\text{lbs}}{\text{CS}} \right) + \left( 250 \frac{\text{HS}}{\text{yr}} \right) \left( 646 \frac{\text{lbs}}{\text{HS}} \right) + \left( 5,355.8 \frac{\text{hrs}}{\text{yr}} \right) \left( 12.7 \frac{\text{lbs}}{\text{hr}} \right) \right]}{2000 \frac{\text{lbs}}{\text{ton}}} = 183.9 \text{ tons}$$

Where:

CS = cold starts

HS = hot starts

Ongoing compliance with this emissions limitation shall be based on the pounds per hour emission data from the CO CEMS and the actual hours of operation of this emissions unit.

c. Emission Limitation:

If a Mitsubishi turbine is installed, CO emissions from this emissions unit shall not exceed 1106.72 lbs/hr during cold startup, 578.5 lbs/hr during hot startup, 973.42 lbs/hr during warm startup, and 263 lbs/hr during shutdown averaged over the duration of the event.





**Applicable Compliance Method:**

These emissions limitations are based on manufacturer's data. Ongoing compliance with the CO emission limitations shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the requirements of 40 CFR Part 60.

**d. Emission Limitation:**

If a Mitsubishi turbine is installed, NO<sub>x</sub> emissions from this emissions unit shall not exceed 2.0 ppmvd at 15% oxygen as an hourly average and 22.6 lbs/hr when the duct burner is not in operation; and, NO<sub>x</sub> emissions shall not exceed 2.0 ppmvd at 15% oxygen as an hourly average and 20.8 lbs/hr when the duct burner is in operation.

**Applicable Compliance Method:**

These emissions limitations are based on manufacturer's data. Ongoing compliance with the NO<sub>x</sub> emissions limitations shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60 and 40 CFR Part 75.

If required, the permittee shall demonstrate compliance using Methods 1 thru 4 and 7E of 40 CFR Part 60, Appendix A, and the procedures specified in 40 CFR 60.4400. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

**e. Emission Limitation:**

If a Mitsubishi turbine is installed, NO<sub>x</sub> emissions shall not exceed 94.8 tons per rolling, 12-month period.

**Applicable Compliance Method:**

This emissions limitation is based on the following anticipated worst case emissions: 250 hot startups per year with a duration of 67 minutes each and maximum NO<sub>x</sub> emissions of 52.4 pounds during each hot startup period; hourly NO<sub>x</sub> emissions at ISO conditions during steady state operation of 20.8 lbs/hr based on manufacturer's data and steady state operating hours as calculated by the following equation.

$$8,760 \text{ hrs} - \left( 250 \left( \frac{67 \text{ min}}{60 \left( \frac{\text{min}}{\text{hr}} \right)} \right) \right) = 8,480.83 \text{ hours during normal operation}$$



The allowable annual emission rate was determined by the following calculation using the above information.

$$\frac{\left(250 \frac{HS}{yr}\right) \left(52.4 \frac{lbs}{HS}\right) + \left(8480.83 \frac{hrs}{yr}\right) \left(20.8 \frac{lbs}{hr}\right)}{2000 \frac{lbs}{ton}} = 94.8 \text{ tons NOx}$$

Where:

HS = hot starts

Ongoing compliance with this emissions limitation shall be determined using the pounds per hour emission data from the NOx CEMS and the actual hours of operation of this emissions unit.

f. Emission Limitation:

If a Mitsubishi turbine is installed, NOx emissions from this emissions unit shall not exceed 43.56 lbs/hr during cold startup, 46.93 lbs/hr during hot startup, 42.27 lbs/hr during warm startup, and 35 lbs/hr during shutdown averaged over the duration of the event.

Applicable Compliance Method:

These emissions limitations are based on manufacturer's data. Ongoing compliance with the NOx emissions limitations shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60 and 40 CFR Part 75.

g. Emission Limitation:

If a Mitsubishi turbine is installed, PM<sub>10</sub> emissions and PM<sub>2.5</sub> emissions shall not exceed 3.84E-03 lb/mmBtu of heat input and 11.3 lbs/hr when the duct burner is not in operation; and, PM<sub>10</sub> and PM<sub>2.5</sub> shall not exceed 3.73E-03 lb/mmBtu of heat input and 10.1 lbs/hr when the duct burner is in operation.

Applicable Compliance Method:

These emissions limitations are based on manufacturer's data. If required, the permittee shall demonstrate compliance with these emissions limitations using Methods 201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



h. Emission Limitation:

If a Mitsubishi turbine is installed,  $PM_{10}$  and  $PM_{2.5}$  emissions from this emissions unit shall not exceed 44.2 tons per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was developed by multiplying the short-term allowable  $PM_{10}/PM_{2.5}$  emission limitation (10.1 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

i. Emission Limitation:

The sulfur content of natural gas burned shall not exceed 0.5 grain per standard cubic feet.

Applicable Compliance Method:

Compliance with the lb/mmBtu limitation will be determined by the monitoring and recordkeeping specified in 40 CFR 60.4365 or 40 CFR 60.4370.

If required, the permittee shall demonstrate compliance using the procedures specified in 40 CFR 60.4415(a)(1). Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

j. Emission Limitation:

$SO_2$  emissions shall not exceed  $1.4E-03$  lb/mmBtu of heat input.

Applicable Compliance Method:

The lb/mmBtu limitation was established based on using pipeline quality natural gas having a maximum sulfur content of 0.5 grains per 100 cubic feet according to the following calculation. Multiply the maximum sulfur content of natural gas (0.5 grain S/100 scf) by the molecular weight of  $SO_2$  (64.07 lb  $SO_2$ /lb-mole) divide by the molecular weight of sulfur (32.06 lb S/lb-mole) divide by (7,000 grains/lb), divide by (1,020 Btu/scf), and multiply by ( $10^6$  Btu/mmBtu).

If required, compliance shall be demonstrated according to 40 CFR 60.4415.

k. Emission Limitation:

The combined  $SO_2$  emissions from P001 and P002 shall not exceed 34.2 tons per rolling 12-month period if Mitsubishi turbines are installed.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the following calculation based on the records required by d). Multiply the maximum sulfur



content of natural gas (0.5 gr S/100 scf) by the molecular weight of SO<sub>2</sub> (64.07 lb/lb-mole), divide by the molecular weight of sulfur (32.06 lb/lb-mole), divide by (7,000 gr/lb), multiply by the monthly natural gas usage (scf), and divide by (2,000 lbs/ton) to determine the monthly SO<sub>2</sub> emissions (tons). Add the SO<sub>2</sub> emissions calculated for the current month to the total SO<sub>2</sub> emissions calculated for the previous 11 months to determine the tons SO<sub>2</sub> emissions per rolling, 12-month period.

I. Emission Limitation:

If a Mitsubishi turbine is installed, VOC emissions shall not exceed 2.0 ppmvd at 15% oxygen as an hourly average and 7.9 lbs/hr when the duct burner is not in operation; and, VOC emissions shall not exceed 2.0 ppmvd at 15% oxygen as an hourly average and 7.3 lbs/hr when the duct burner is in operation.

Applicable Compliance Method:

These emissions limitations are based on manufacturer's data. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

m. Emission Limitation:

If a Mitsubishi turbine is installed, VOC emissions shall not exceed 56.0 tons per rolling, 12-month period.

Applicable Compliance Method:

This emissions limitation is based on the following anticipated worst case emissions: 50 cold startups per year, with a minimum downtime preceding cold startup of 60 minutes and a cold startup duration of 150 minutes, maximum VOC emissions of 848.5 pounds during each cold startup period; 250 hot startups per year with a of duration of 67 minutes each and maximum VOC emissions of 122.1 pounds during each hot startup period; hourly VOC emissions at ISO conditions during steady state operation of 7.3 lbs/hr based on manufacturer's data and steady state operating hours was determined by the following equation.

$$8,760 \text{ hrs} - \left( 50 \left( 60 \text{ hrs} + \frac{150 \text{ min}}{60 \left( \frac{\text{min}}{\text{hr}} \right)} \right) + 250 \left( \frac{67 \text{ min}}{60 \left( \frac{\text{min}}{\text{hr}} \right)} \right) \right) = 5,355.8 \text{ hours}$$

The allowable annual emission rate was determined by the following calculation using the above information.



$$\frac{\left[\left(50 \frac{CS}{yr}\right)\left(848.5 \frac{lbs}{CS}\right) + \left(250 \frac{HS}{yr}\right)\left(122.1 \frac{lbs}{HS}\right) + \left(5,355.8 \frac{hrs}{yr}\right)\left(7.3 \frac{lbs}{hr}\right)\right]}{2000 \frac{lbs}{ton}} = 56.0 \text{ tons}$$

Where:

CS = cold starts

HS = hot starts

Ongoing compliance with this emissions limitation shall be based on the following calculation.

$$VOC = \frac{\left[\left(\#CS\right)\left(339.5 \frac{lbs}{hr}\right) + \left(\#HS\right)\left(109.88 \frac{lbs}{HS}\right) + \left(\#WS\right)\left(314.07 \frac{lbs}{hr}\right) + \left(\#SSDB\right)\left(7.3 \frac{lbs}{hr}\right) + \left(\#SSNDB\right)\left(7.0 \frac{lbs}{hr}\right)\right]}{2000 \frac{lbs}{ton}}$$

Where:

VOC = tons VOC emissions per rolling, 12-month period

#CS = hours operated in cold startup per rolling, 12-month period

#HS = hours operated in hot startup per rolling, 12-month period

#WS = hours operated in warm startup per rolling, 12-month period

#SSDB = hours operated in steady state with duct burner per rolling, 12-month period

#SSNDB = hours operated in steady state without duct burner per rolling, 12-month period

n. Emission Limitation:

If a Mitsubishi turbine is installed, VOC emissions from this emissions unit shall not exceed 339.4 lbs/hr during cold startup, 109.34 lbs/hr during hot startup, 314.07 lbs/hr during warm startup, and 111 lbs/hr during shutdown averaged over the duration of the event.

Applicable Compliance Method:

These emissions limitations are based on manufacturer's data. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or



25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

o. Emission Limitation:

If a Mitsubishi turbine is installed, H<sub>2</sub>SO<sub>4</sub> emissions shall not exceed 4.1E-04 lb/mmBtu of heat input and 1.2 lbs/hr when the duct burner is not in operation; and, H<sub>2</sub>SO<sub>4</sub> emissions shall not exceed 4.4E-04 lb/mmBtu of heat input and 1.2 lbs/hr when the duct burner is in operation.

These emissions limitations are based on manufacturer's data. If required, the permittee shall demonstrate compliance using Methods 1 thru 4 and 8 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

p. Emission Limitation:

If a Mitsubishi turbine is installed, H<sub>2</sub>SO<sub>4</sub> emissions shall not exceed 5.26 tons per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was developed by multiplying the short-term allowable H<sub>2</sub>SO<sub>4</sub> emission limitation (1.2 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

q. Emission Limitation:

If a Mitsubishi turbine is installed, CO<sub>2</sub>e emissions shall not exceed 318,404 lbs/hr and 1,394,611 tons per rolling, 12-month period.

Applicable Compliance Method:

The hourly emission limitation is based on the sum of following manufacturer's data (317,920.46 lbs/hr CO<sub>2</sub>, 6.007 lbs/hr CH<sub>4</sub>, and 1.154 lbs/hr N<sub>2</sub>O) multiplied by the associated global warming potential for each pollutant (CO<sub>2</sub>=1, CH<sub>4</sub>=21, N<sub>2</sub>O=310 from Table A-1 of 40 CFR 98).

$$\left[ \left( 317,920.46 \frac{\text{lbs}}{\text{hr}} \right) (1) + \left( 6.007 \frac{\text{lbs}}{\text{hr}} \right) (21) + \left( 1.154 \frac{\text{lbs}}{\text{hr}} \right) (310) \right] = 318,404 \text{ lbs/hr}$$

Since the CO<sub>2</sub>e emissions are estimated to consist of more than 99% CO<sub>2</sub>, compliance with this emission limitation will be assumed provided that the hourly CO<sub>2</sub> emission rate does not exceed 317,920.46 lbs/hr. If required, the permittee shall conduct emissions testing using Methods 1, 2, 3A and 4 of 40 CFR Part 60, Appendix A to determine the hourly CO<sub>2</sub> emission rate.



The annual emission limitation is based on the sum of following manufacturer's data (317,920.46 lbs/hr CO<sub>2</sub>, 6.01 lbs/hr CH<sub>4</sub>, and 1.15 lbs/hr N<sub>2</sub>O) multiplied by the associated global warming potential for each pollutant (CO<sub>2</sub>=1, CH<sub>4</sub>=21, N<sub>2</sub>O=310 from Table A-1 of 40 CFR 98), multiplied by the maximum annual hours of operation (8,760 hrs/yr) and divided by (2,000 lbs/ton).

$$\left[ \left( 317,920.46 \frac{\text{lbs}}{\text{hr}} \right) (1) + \left( 6.007 \frac{\text{lbs}}{\text{hr}} \right) (21) + \left( 1.154 \frac{\text{lbs}}{\text{hr}} \right) (310) \right] \left( 8,760 \frac{\text{hrs}}{\text{yr}} \right) \left( \frac{\text{ton}}{2000 \text{ lbs}} \right) = 1,394,611 \text{ tons/yr}$$

Since the CO<sub>2</sub>e emissions are estimated to consist of more than 99% CO<sub>2</sub>, compliance with this emission limitation will be assumed provided that the rolling, 12-month CO<sub>2</sub> emissions as calculated in section d) above do not exceed 1,392,492 tons per rolling, 12-month period (317,920.46 lbs/hr x 8760 hrs/yr x ton/2000 lb = 1,392,492 tons/yr).

r. Emission Limitation:

Visible particulate emissions from any stack serving this emissions unit shall not exceed 10 percent opacity as a 6-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance with this emissions limitation using Method 9 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be approved with prior approval from Ohio EPA.

s. Emission Limitation:

If a Siemens turbine is installed, CO emissions from this emissions unit shall not exceed 2.0 ppmvd at 15% oxygen as an hourly average and 13.0 lbs/hr when the duct burner is not in operation; and, 2.0 ppmvd at 15% oxygen as an hourly average and 13.0 lbs/hr when the duct burner is in operation.

Applicable Compliance Method:

These emissions limitations are based on manufacturer's data. Ongoing compliance with the CO emission limitations shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the requirements of 40 CFR Part 60.

If required, the permittee shall demonstrate compliance using Methods 1 thru 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.

t. Emission Limitation:



If a Siemens turbine is installed, CO emissions from this emissions unit shall not exceed 182.0 lbs/hr during cold startup, 211.46 lbs/hr during hot startup, 214.90 lbs/hr during warm startup, and 113 lbs/hr during shutdown averaged over the duration of the event.

Applicable Compliance Method:

These emissions limitations are based on manufacturer's data. Ongoing compliance with the CO emission limitations shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the requirements of 40 CFR Part 60.

u. Emission Limitation:

If a Siemens turbine is installed, CO emissions from this emissions unit shall not exceed 72.2 tons per rolling, 12-month period.

Applicable Compliance Method:

This emissions limitation is based on the following anticipated worst case emissions: 250 warm startups per year, with a minimum downtime preceding warm startup of 16 hours and a warm startup duration of 98 minutes, maximum CO emissions of 351 pounds during each warm startup period; hourly CO emissions at ISO conditions during steady state operation of 13.0 lbs/hr based on manufacturer's data and steady state operating hours was determined by the following equation.

$$8,760 \text{ hrs} - \left( 250 \left( 16 \text{ hrs} + \frac{98 \text{ min}}{60 \left( \frac{\text{min}}{\text{hr}} \right)} \right) \right) = 4,351.7 \text{ hours}$$

The allowable annual emission rate was determined by the following calculation using the above information.

$$\frac{\left[ \left( 250 \frac{\text{WS}}{\text{yr}} \right) \left( 351 \frac{\text{lbs}}{\text{WS}} \right) + \left( 4,351.7 \frac{\text{hrs}}{\text{yr}} \right) \left( 13.0 \frac{\text{lbs}}{\text{hr}} \right) \right]}{2000 \frac{\text{lbs}}{\text{ton}}} = 72.2 \text{ tons}$$

Where:

WS = warm starts

Ongoing compliance with this emissions limitation shall be based on the pounds per hour emission data from the CO CEMS and the actual hours of operation of this emissions unit.





v. Emission Limitation:

If a Siemens turbine is installed, NO<sub>x</sub> emissions from this emissions unit shall not exceed 2.0 ppmvd at 15% oxygen as an hourly average and 22.0 lbs/hr when the duct burner is not in operation; and, NO<sub>x</sub> emissions shall not exceed 2.0 ppmvd at 15% oxygen as an hourly average and 21.0 lbs/hr when the duct burner is in operation.

Applicable Compliance Method:

These emissions limitations are based on manufacturer's data. Ongoing compliance with the NO<sub>x</sub> emissions limitations shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60 and 40 CFR Part 75.

If required, the permittee shall demonstrate compliance using Methods 1 thru 4 and 7E of 40 CFR Part 60, Appendix A, and the procedures specified in 40 CFR 60.4400. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

w. Emission Limitation:

If a Siemens turbine is installed, NO<sub>x</sub> emissions shall not exceed 92.0 tons per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was developed by multiplying the short-term allowable NO<sub>x</sub> emission limitation (21.0 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

Ongoing compliance with this emissions limitation shall be determined using the pounds per hour emission data from the NO<sub>x</sub> CEMS and the actual hours of operation of this emissions unit.

x. Emission Limitation:

If a Siemens turbine is installed, NO<sub>x</sub> emissions from this emissions unit shall not exceed 62.67 lbs/hr during cold startup, 76.83 lbs/hr during hot startup, 78.98 lbs/hr during warm startup, and 46 lbs/hr during shutdown averaged over the duration of the event.

Applicable Compliance Method:

These emissions limitations are based on manufacturer's data. Ongoing compliance with the NO<sub>x</sub> emissions limitations shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this



permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60 and 40 CFR Part 75.

y. Emission Limitation:

If a Siemens turbine is installed,  $PM_{10}$  emissions and  $PM_{2.5}$  emissions shall not exceed  $4.7E-03$  lb/mmBtu of heat input and 13.3 lbs/hr when the duct burner is not in operation; and,  $PM_{10}$  and  $PM_{2.5}$  shall not exceed  $5.5E-03$  lb/mmBtu of heat input and 14.0 lbs/hr when the duct burner is in operation.

Applicable Compliance Method:

These emissions limitations are based on manufacturer's data. If required, the permittee shall demonstrate compliance with these emissions limitations using Methods 201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.

z. Emission Limitation:

If a Siemens turbine is installed,  $PM_{10}$  and  $PM_{2.5}$  emissions from this emissions unit shall not exceed 61.3 tons per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was developed by multiplying the short-term allowable  $PM_{10}/PM_{2.5}$  emission limitation (14.0 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

aa. Emission Limitation:

The combined  $SO_2$  emissions from P001 and P002 shall not exceed 36.8 tons per rolling, 12-month period if Siemens turbines are installed.

Applicable Compliance Method:

Compliance with this emissions limitation shall be determined by the following calculation based on the records required by d). Multiply the maximum sulfur content of natural gas (0.5 gr S/100 scf) by the molecular weight of  $SO_2$  (64.07 lb/lb-mole), divide by the molecular weight of sulfur (32.06 lb/lb-mole), divide by (7,000 gr/lb), multiply by the monthly natural gas usage (scf), and divide by (2,000 lbs/ton) to determine the monthly  $SO_2$  emissions (tons). Add the  $SO_2$  emissions calculated for the current month to the total  $SO_2$  emissions calculated for the previous 11 months to determine the tons  $SO_2$  emissions per rolling, 12-month period.



bb. Emission Limitation:

If a Siemens turbine is installed, VOC emissions shall not exceed 1.0 ppmvd at 15% oxygen as an hourly average and 3.9 lbs/hr when the duct burner is not in operation; and, VOC emissions shall not exceed 1.9 ppmvd at 15% oxygen as an hourly average and 5.9 lbs/hr when the duct burner is in operation.

Applicable Compliance Method:

These emissions limitations are based on manufacturer's data. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

cc. Emission Limitation:

If a Siemens turbine is installed, VOC emissions shall not exceed 28.6 tons per rolling, 12-month period.

Applicable Compliance Method:

This emissions limitation is based on the following anticipated worst case emissions: 250 warm startups per year, with a minimum downtime preceding warm startup of 16 hours and a warm startup duration of 98 minutes, maximum VOC emissions of 138 pounds during each warm startup period; hourly VOC emissions at ISO conditions during steady state operation of 5.2 lbs/hr based on manufacturer's data and steady state operating hours was determined by the following equation.

$$8,760 \text{ hrs} - \left( 250 \left( 16 \text{ hrs} + \frac{98 \text{ min}}{60 \left( \frac{\text{min}}{\text{hr}} \right)} \right) \right) = 4,351.7 \text{ hours}$$

The allowable annual emission rate was determined by the following calculation using the above information.

$$\frac{\left[ \left( 250 \frac{\text{WS}}{\text{yr}} \right) \left( 138 \frac{\text{lbs}}{\text{WS}} \right) + \left( 4,351.7 \frac{\text{hrs}}{\text{yr}} \right) \left( 5.2 \frac{\text{lbs}}{\text{hr}} \right) \right]}{2000 \frac{\text{lbs}}{\text{ton}}} = 28.6 \text{ tons}$$

Where:

WS = warm starts

Ongoing compliance with this emissions limitation shall be based on the following calculation.



$$\frac{\left[ (\#CS) \left( 56.0 \frac{\text{lbs}}{\text{hr}} \right) + (\#HS) \left( 83.41 \frac{\text{lbs}}{\text{hr}} \right) + (\#WS) \left( 84.49 \frac{\text{lbs}}{\text{hr}} \right) + (\#SSDB) \left( 5.2 \frac{\text{lbs}}{\text{hr}} \right) + (\#SSNDB) \left( 3.4 \frac{\text{lbs}}{\text{hr}} \right) \right]}{2000 \frac{\text{lbs}}{\text{ton}}} = \text{VOC}$$

Where:

VOC = tons VOC emissions per rolling, 12-month period

#CS = hours operated in cold startup per rolling, 12-month period

#HS = hours operated in hot startup per rolling, 12-month period

#WS = hours operated in warm startup per rolling, 12-month period

#SSDB = hours operated in steady state with duct burner per rolling, 12-month period

#SSNDB = hours operated in steady state without duct burner per rolling, 12-month period

dd. Emission Limitation:

If a Siemens turbine is installed, VOC emissions from this emissions unit shall not exceed 56.0 lbs/hr during cold startup, 83.41 lbs/hr during hot startup, 84.49 lbs/hr during warm startup, and 44 lbs/hr during shutdown averaged over the duration of the event.

Applicable Compliance Method:

These emissions limitations are based on manufacturer's data. If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA approved test methods may be used with prior approval from Ohio EPA.

ee. Emission Limitation:

If a Siemens turbine is installed, H<sub>2</sub>SO<sub>4</sub> emissions shall not exceed 6.0E-04 lb/mmBtu of heat input and 1.6 lbs/hr when the duct burner is not in operation; and, H<sub>2</sub>SO<sub>4</sub> emissions shall not exceed 7.0E-04 lb/mmBtu of heat input and 1.5 lbs/hr when the duct burner is in operation.

These emissions limitations are based on manufacturer's data. If required, the permittee shall demonstrate compliance using Methods 1 thru 4 and 8 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.



ff. Emission Limitation:

If a Siemens turbine is installed, H<sub>2</sub>SO<sub>4</sub> emissions shall not exceed 6.57 tons per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was developed by multiplying the short-term allowable H<sub>2</sub>SO<sub>4</sub> emission limitation (1.5 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton. Therefore, if compliance is shown with the short-term allowable emission limitation, compliance shall also be shown with the annual emission limitation.

gg. Emission Limitation:

If a Siemens turbine is installed, CO<sub>2</sub>e emissions shall not exceed 327,819 lbs/hr and 1,435,847 tons per rolling, 12-month period.

Applicable Compliance Method:

The hourly emission limitation is based on the sum of following manufacturer's data (327,380 lbs/hr CO<sub>2</sub>, 6.14 lbs/hr CH<sub>4</sub>, and 1.00 lbs/hr N<sub>2</sub>O) multiplied by the associated global warming potential for each pollutant (CO<sub>2</sub>=1, CH<sub>4</sub>=21, N<sub>2</sub>O=310 from Table A-1 of 40 CFR 98).

$$\left[ \left( 327,380 \frac{\text{lbs}}{\text{hr}} \right) (1) + \left( 6.14 \frac{\text{lbs}}{\text{hr}} \right) (21) + \left( 1.00 \frac{\text{lbs}}{\text{hr}} \right) (310) \right] = 327,819 \text{ lbs/hr}$$

Since the CO<sub>2</sub>e emissions are estimated to consist of more than 99% CO<sub>2</sub>, compliance with this emission limitation will be assumed provided that the hourly CO<sub>2</sub> emission rate does not exceed 327,380 lbs/hr. If required, the permittee shall conduct emissions testing using Methods 1, 2, 3A and 4 of 40 CFR Part 60, Appendix A to determine the hourly CO<sub>2</sub> emission rate.

This emission limitation is based on the sum of following manufacturer's data (327,380 lbs/hr CO<sub>2</sub>, 6.14 lbs/hr CH<sub>4</sub>, and 1.00 lbs/hr N<sub>2</sub>O) multiplied by the associated global warming potential for each pollutant (CO<sub>2</sub>=1, CH<sub>4</sub>=21, N<sub>2</sub>O=310 from Table A-1 of 40 CFR 98), multiplied by the maximum annual hours of operation (8,760 hrs/yr) and divided by (2,000 lbs/ton).

$$\left[ \left( 327,380 \frac{\text{lbs}}{\text{hr}} \right) (1) + \left( 6.14 \frac{\text{lbs}}{\text{hr}} \right) (21) + \left( 1.00 \frac{\text{lbs}}{\text{hr}} \right) (310) \right] \left( 8,760 \frac{\text{hrs}}{\text{yr}} \right) \left( \frac{\text{ton}}{2000 \text{ lbs}} \right) = 1,435,847 \text{ tons/yr}$$

Since the CO<sub>2</sub>e emissions are estimated to consist of more than 99% CO<sub>2</sub>, compliance with this emission limitation will be assumed provided that the rolling, 12-month CO<sub>2</sub> emissions as calculated in section d) above do not exceed 1,433,924 tons per rolling, 12-month period (327,380 lbs/hr x 8760 hrs/yr x ton/2000 lb = 1,433,924 tons/yr).



- (2) The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:

- a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of the emissions unit.
- b. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for CO, NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, VOC, and H<sub>2</sub>SO<sub>4</sub>, in the appropriate averaging period(s).

The emission testing shall also be conducted to determine a site-specific emission factor for CO<sub>2</sub>.

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

For CO, Methods 1 thru 4 and 10 of 40 CFR Part 60, Appendix A;

For NO<sub>x</sub>, Methods 1 thru 4 and 7E of 40 CFR Part 60, Appendix A, and the procedures specified in 40 CFR 60.4400;

For PM<sub>10</sub> and PM<sub>2.5</sub>, Methods 201A and 202 of 40 CFR Part 52, Appendix M;

For SO<sub>2</sub>, 40 CFR 60.4415;

For VOC, Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents;

For H<sub>2</sub>SO<sub>4</sub>, Methods 1 thru 4 and 8 of 40 CFR Part 60, Appendix A; and

For CO<sub>2</sub>, Methods 1, 2, 3A, and 4 of 40 CFR Part 60, Appendix A.

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

- d. The test(s) shall be conducted under those representative conditions that challenge to the fullest extent possible a facility's ability to meet the applicable emissions limits and/or control requirements, unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency. Although this generally consists of operating the emissions unit at its maximum material input/production rates and results in the highest emission rate of the tested pollutant, there may be circumstances where a lower emissions loading is deemed the most challenging control scenario. Failure to test under these conditions is justification for not accepting the test results as a demonstration of compliance.



- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the appropriate Ohio EPA District Office or local air agency. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA District Office's or local air agency's refusal to accept the results of the emission test(s).
  - f. Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.
  - g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following completion of the test(s). The permittee may request additional time for the submittal of the written report, where warranted, with prior approval from the appropriate Ohio EPA District Office or local air agency.
- (3) Within 60 days of achieving the maximum production rate at which the emissions unit(s) will be operated, but not later than 180 days after initial startup, the permittee shall conduct certification tests of the continuous NO<sub>x</sub> monitoring system, in units of the applicable standard(s), to demonstrate compliance with 40 CFR Part 60, Appendix B, Performance Specification 2; Performance Specification 6 relative accuracy requirements; ORC section 3704.03(I); and 40 CFR Part 75.

The permittee shall certify that the fuel flow monitor/meter meets 40 CFR 75 certification requirements prior to the performance specification test and shall demonstrate how the pound per hour emissions of NO<sub>x</sub> will be calculated stoichiometrically from the fuel flow rate.

Personnel from the Ohio EPA Central Office and the appropriate Ohio EPA District Office or local air agency shall be notified 45 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the appropriate Ohio EPA District Office or local air agency and one copy to Ohio EPA Central Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification, or recommendation for certification by Ohio EPA to U.S. EPA, of the continuous NO<sub>x</sub> monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2; Performance Specification 6 relative accuracy requirements; ORC section 3704.03(I); and 40 CFR Part 75.



Ongoing compliance with the NO<sub>x</sub> emissions limitations contained in this permit, 40 CFR Parts 60 and 75, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60 and 40 CFR Part 75.

- (4) Within 60 days of achieving the maximum production rate at which the emissions unit(s) will be operated, but not later than 180 days after initial startup, the permittee shall conduct certification tests of the continuous CO monitoring system in units of the applicable standard(s), to demonstrate compliance with 40 CFR Part 60, Appendix B, Performance Specification 4 or 4a (as appropriate); Performance Specification 6 relative accuracy requirements; and ORC section 3704.03(I).

The permittee shall certify that the fuel flow monitor/meter is calibrated prior to the performance specification test and shall demonstrate how the pound per hour emissions of CO will be calculated stoichiometrically from the fuel flow rate.

Personnel from the Ohio EPA Central Office and the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. Two copies of the test results shall be submitted to Ohio EPA, one copy to the appropriate Ohio EPA District Office or local air agency and one copy to Ohio EPA Central Office, and pursuant to OAC rule 3745-15-04, within 30 days after the test is completed.

Certification of the continuous CO monitoring system shall be granted upon determination by the Ohio EPA Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 4 or 4a (as appropriate); Performance Specification 6 relative accuracy requirements; and ORC section 3704.03(I).

Ongoing compliance with the CO emission limitations contained in this permit, 40 CFR Part 60, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the requirements of 40 CFR Part 60.

g) Miscellaneous Requirements

- (1) None.



**This foregoing document was electronically filed with the Public Utilities**

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Summary: Correspondence of Oregon Clean Energy, LLC in Compliance with Commitment No. 20 electronically filed by Teresa Orahod on behalf of Sally Bloomfield