Ohio Environmental Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

12/6/2010

Certified Mail

Facility ID: 1409120656
Permit Number: P0104674
County: Butler

John Funke
Duke Energy Kentucky, Woodsdale Generating Station
PO Box 960
Mail Drop EX552
Cincinnati, OH 45201

RE: PRELIMINARY PROPOSED AIR POLLUTION TITLE V
Permit Type: Renewal

Dear Permit Holder:

Enclosed is the Ohio EPA Preliminary Proposed Title V permit that was issued in draft form on 10/18/2010. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

We are submitting this for your review and comment. If you do not agree with the Preliminary Proposed Title V permit as written, you now have the opportunity to raise your concerns. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Issued Air Pollution Control Permits" link. Comments will be accepted as a marked-up copy of the permit or in narrative format. Any comments must be sent to the following within 14 days of your receipt of this letter:

Andrew Hall
Permit Review/Development Section
Ohio EPA, DAPC
122 South Front Street
Columbus, Ohio 43215

and

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660

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

If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: Hamilton County Dept. of Environmental Services

Response to Comments

Response to comments for: Title V Permit

Facility ID:	1409120656
Facility Name:	Duke Energy Kentucky, Woodsdale Generating Station
Facility Description:	
Facility Address:	2100 Woodsdale Road Trenton, OH 45067-0000 Butler County
Permit #:	P0104674, Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Journal News on 10/20/2010. The comment period ended on 11/19/2010.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

The following comments were received during the comment period specified. Ohio EPA reviewed and considered all comments received during the public comment period. By law, Ohio EPA has authority to consider specific issues related to protection of the environment and public health. Often, public concerns fall outside the scope of that authority. For example, concerns about zoning issues are addressed at the local level. Ohio EPA may respond to those concerns in this document by identifying another government agency with more direct authority over the issue.

In an effort to help you review this document, the questions are grouped by topic and organized in a consistent format. PDF copies of the original comments in the format submitted are available upon request.

1. Topic: **None**
    a. Comment: Duke Energy submitted a copy of the draft permit with hand written comments that consisted of request for various clarifications and some typographical errors. No substantive comments were received relating to permit content.
    b. Response: The requested clarifications were made and typographical errors corrected.

Ohio | Environmental Protection Agency

PRELIMINARY PROPOSED

Division of Air Pollution Control
Title V Permit
for
Duke Energy Kentucky, Woodsdale Generating Station

Facility ID:	1409120656
Permit Number:	P0104674
Permit Type:	Renewal
Issued:	12/6/2010
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Ohio Environmental Protection Agency

Division of Air Pollution Control
Title V Permit
for
Duke Energy Kentucky, Woodsdale Generating Station

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Authorization

Facility ID: 1409120656
Facility Description:
Application Number(s): A0029006, A0037167
Permit Number: P0104674
Permit Description: Title V Permit Renewal Duke Energy Woodsdale
Permit Type: Renewal
Issue Date: 12/6/2010
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0097361

This document constitutes issuance of an OAC Chapter 3745-77 Title V permit to:

Duke Energy Kentucky, Woodsdale Generating Station
2100 Woodsdale Road
Trenton, OH 45067-0000

Ohio EPA District Office or local air agency responsible for processing and administering your permit:

Hamilton County Dept. of Environmental Services
250 William Howard Taft Pkwy.
Cincinnati, OH 45219-2660
(513)946-7777

The above named entity is hereby granted a Title V permit pursuant to Chapter 3745-77 of the Ohio Administrative Code. This permit and the authorization to operate the air contaminant sources (emissions units) at this facility shall expire at midnight on the expiration date shown above. You will be sent a notice approximately 18 months prior to the expiration date regarding the renewal of this permit. If you do not receive a notice, please contact the Hamilton County Dept. of Environmental Services. If a renewal permit is not issued prior to the expiration date, the permittee may continue to operate pursuant to OAC rule 3745-77-08(E) and in accordance with the terms of this permit beyond the expiration date, if a timely renewal application is submitted. A renewal application will be considered timely if it is submitted no earlier than 18 months (540 days) and no later than 6 months (180 days) prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Chris Korleski
Director

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. 24., Reporting Requirements Related to Monitoring and Record Keeping Requirements of State-Only Enforceable Permit Terms and Conditions

(2) Standard Term and Condition A. 25., Records Retention Requirements for State-Only Enforceable Permit Terms and Conditions

(3) Standard Term and Condition A. 27., Scheduled Maintenance/Malfunction Reporting

(4) Standard Term and Condition A. 29., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations

(Authority for term: ORC 3704.036(A))

2. Monitoring and Related Record Keeping and Reporting Requirements

a) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit), 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.

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(i))

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

(Authority for term: OAC rule 3745-77-07(A)(3)(b)(ii))

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

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

Any malfunction, as defined in OAC rule 3745-15-06(B)(1), shall be promptly reported to the Ohio EPA in accordance with OAC rule 3745-15-06. In addition, to fulfill the OAC rule 3745-77-07(A)(3)(c) deviation reporting requirements for malfunctions, written reports that identify each malfunction that occurred during each calendar quarter (including each malfunction reported only verbally in accordance with OAC rule 3745-15-06) shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year in accordance with Standard Term and Condition A.2.c)(2) below; and each report shall cover the previous calendar quarter. An exceedance of the visible emission limitations specified in OAC rule 3745-17-07(A)(1) that is caused by a malfunction is not a violation and does not need to be reported as a deviation if the owner or operator of the affected air contaminant source or air pollution control equipment complies with the requirements of OAC rule 3745-17-07(A)(3)(c).

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

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

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

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(2) Except as may otherwise be provided in the terms and conditions for a specific emissions unit (i.e., in section C. Emissions Unit Terms and Conditions of this Title V permit or, in some cases, in section B. Facility-Wide Terms and Conditions of this Title V permit), all reporting required in accordance with OAC rule 3745-77-07(A)(3)(c) for deviations of the emission limitations, operational restrictions, and control device operating parameter limitations shall be submitted in the following manner:

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

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

These written deviation reports shall satisfy the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations. Full compliance with OAC rule 3745-77-07(A)(3)(c) requires reporting of all other deviations of the federally enforceable requirements specified in the permit as required by such rule.
If an emissions unit has a deviation reporting requirement for a specific emission limitation, operational restriction, or control device operating parameter limitation that is not on a quarterly basis (e.g., within 30 days following the end of the calendar month, or within 30 or 45 days after the exceedance occurs), that deviation reporting requirement satisfies the reporting requirements specified in this Standard Term and Condition for that specific emission limitation, operational restriction, or control device parameter limitation. Following the provisions of that non-quarterly deviation reporting requirement will also satisfy (for the deviations so reported) the requirements of OAC rule 3745-77-07(A)(3)(c) pertaining to the submission of monitoring reports every six months and to the prompt reporting of all deviations, and additional quarterly deviation reports for that specific emission limitation, operational restriction, or control device parameter limitation are not required pursuant to this Standard Term and Condition.
See A.29 below if no deviations occurred during the quarter.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

(3) All reporting required in accordance with the OAC rule 3745-77-07(A)(3)(c) for other deviations of the federally enforceable permit requirements which are not reported in accordance with Standard Term and Condition A.2)c)(2) above shall be submitted in the following manner:

Unless otherwise specified by rule, written reports that identify deviations of the following federally enforceable requirements contained in this permit; Standard Terms and Conditions: A.3, A.4, A.5, A.7.e), A.8, A.13, A.15, A.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted (i.e., postmarked) to the appropriate Ohio EPA District Office or local air agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.
In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.
These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.
If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

(Authority for term: OAC rules 3745-77-07(A)(3)(c)(i) and (ii) and OAC rule 3745-77-07(A)(13)(b))

(4) Each written report shall be signed by a responsible official certifying that, "based on information and belief formed after reasonable inquiry, the statements and information in the report (including any written malfunction reports required by OAC rule 3745-15-06 that are referenced in the deviation reports) are true, accurate, and complete."

(Authority for term: OAC rule 3745-77-07(A)(3)(c)(iv))

(5) Reports of any required monitoring and/or record keeping information shall be submitted to Hamilton County Dept. of Environmental Services.

(Authority for term: OAC rule 3745-77-07(A)(3)(c))

3. Scheduled Maintenance

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. Except as provided in OAC rule 3745-15-06(A)(3), any scheduled maintenance necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s). Any scheduled maintenance, as defined in OAC rule 3745-15-06(A)(1), that results in a deviation from a federally enforceable emission limitation (or control requirement) shall be reported in the same manner as described for malfunctions in Standard Term and Condition A.2.c)(1) above.
(Authority for term: OAC rule 3745-77-07(A)(3)(c))

4. Risk Management Plans

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

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

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

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

5. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.
(Authority for term: OAC rule 3745-77-07(A)(5))

6. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.
(Authority for term: OAC rule 3745-77-07(A)(6))

7. General Requirements

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

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

c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with Standard Term and Condition A.11 below. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

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

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

f) Except as otherwise indicated below, this Title V permit, or permit modification, is effective for five years from the original effective date specified in the permit. In the event that this facility becomes eligible for non-title V permits, this permit shall cease to be enforceable when:

(1) the permittee submits an approved facility-wide potential to emit analysis supporting a claim that the facility no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or

(2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or

(3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air contaminent sources once this permit ceases to be enforceable. The permittee shall comply with any residual requirements, such as quarterly deviation reports, semi-annual deviation reports, and annual compliance certifications covering the period during which this Title V permit was enforceable. All records relating to this permit must be maintained in accordance with law.
(Authority for term: OAC rule 3745-77-01(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))

8. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.
(Authority for term: OAC rule 3745-77-07(A)(8))

9. Marketable Permit Programs

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

10. Reasonably Anticipated Operating Scenarios

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

11. Reopening for Cause

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

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

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

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

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

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

12. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.
(Authority for term: OAC rule 3745-77-07(B))

13. Compliance Requirements

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

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

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

(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.

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

(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.

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

(1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted (i.e., postmarked) on or before April 30th of each year during the permit term.

(2) Compliance certifications shall include the following:

a. An identification of each term or condition of this permit that is the basis of the certification.

b. The permittee's current compliance status.

c. Whether compliance was continuous or intermittent.

d. The method(s) used for determining the compliance status of the source currently and over the required reporting period.

e. Such other facts as the Director of the Ohio EPA may require in the permit to determine the compliance status of the source.

(3) Compliance certifications shall contain such additional requirements as may be specified pursuant to sections 114(a)(3) and 504(b) of the Act.

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

14. Permit Shield

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

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

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

15. Operational Flexibility

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

or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the appropriate District Office of the Ohio EPA or local air agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).
(Authority for term: OAC rules 3745-77-07(H)(1) and (2))

16. Emergencies

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

17. Off-Permit Changes

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

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

b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.

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

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

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

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

18. Compliance Method Requirements

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by

law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 Fed. Reg. 8314, Feb. 24, 1997), in the context of any future proceeding.
(This term is provided for informational purposes only.)

19. Insignificant Activities or Emissions Levels

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

20. Permit to Install Requirement

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

21. Air Pollution Nuisance

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

22. Permanent Shutdown of an Emissions Unit

The permittee may notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification from the responsible 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 responsible official that the emissions unit was permanently shut down.
After the date on which an emissions unit is permanently shut down (i.e., that has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31 and therefore ceases to meet the definition of an "emissions unit" as defined in OAC rule 3745-77-01(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.
No emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit to install pursuant to OAC Chapter 3745-31.
(Authority for term: OAC rule 3745-77-01)

23. Title VI Provisions

If applicable, the permittee shall comply with the standards for recycling and reducing emissions of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices specified in 40 CFR 82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment specified in 40 CFR 82.158.

c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

(Authority for term: OAC rule 3745-77-01(H)(11))

24. Reporting Requirements Related to Monitoring and Record Keeping Requirements Under State Law Only

The permittee shall submit required reports in the following manner:

a) Reports of any required monitoring and/or record keeping information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

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

25. Records Retention Requirements Under State Law Only

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.

26. Inspections and Information Requests

The Director of the Ohio EPA, or an authorized representative of the Director, may, subject to the safety requirements of the permittee and without undue delay, enter upon the premises of this source at any reasonable time for purposes of making inspections, conducting tests, examining records or reports pertaining to any emission of air contaminants, and determining compliance with any applicable State air pollution laws and regulations and the terms and conditions of this permit. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine

whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon verbal or written request, the permittee shall also furnish to the Director of the Ohio EPA, or an authorized representative of the Director, copies of records required to be kept by this permit.
(Authority for term: OAC rule 3745-77-07(C))

27. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

28. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.
(Authority for term: OAC rule 3745-77-01(C))

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted (i.e., postmarked) by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.
The permittee is not required to submit a quarterly report which states that no deviations occurred during that quarter for the following situations:

a) where an emissions unit has deviation reporting requirements for a specific emission limitation, operational restriction, or control device parameter limitation that override the deviation reporting requirements specified in Standard Term and Condition A.2.c)(2); or

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

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

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 following insignificant emissions units are located at this facility:

EU ID	Operations, Property and/or Equipment Description
B025	Combustion turbine black start unit (PTI 14-1984)
B026	Diesel Fire Pump (PTI 14-2179)
G001	Gasoline dispensing Operation (PTI 14-2520)
L001	Non-halogenated solvent cold parts cleaner (PTI 14-2954)
P001	275,000 BTU/hr propane fired generator

   Each insignificant emissions unit at this facility must comply with all applicable Ohio EPA and federal regulations, as well as any emission limitations and/or control requirements contained within a permit to install for the emissions unit. Insignificant emissions units listed above that are not subject to specific permit to install requirements are subject to one or more applicable requirements contained in the SIP-approved versions of OAC Chapters 3745-17, 3745-18, and 3745-21.

3. The permittee shall ensure that any CAIR NOx, SO2, or NOx ozone season units complies with the requirements of OAC 3745-109, which includes submitting timely permit applications. The permittee shall ensure that the affected emissions units comply with those requirements as outlined in the permit application submitted as required by OAC rules 3745-109-03, 109-10 and 109-16 for the affected emissions units.

4. The permittee shall also comply with any subsequent federally mandated programs that may replace the CAIR program affecting electric generating facilities (see note in paragraph 5.a).

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

5. Clean Air Interstate Rule – OAC Chapter 3745-109**.**

   a) Facility Code – 1409120656.

      (1) B001 – 1034 MMBtu/Hr simple cycle combustion turbine;

      (2) B002 – 1034 MMBtu/Hr simple cycle combustion turbine;

      (3) B003 – 1034 MMBtu/Hr simple cycle combustion turbine;

      (4) B004 – 1034 MMBtu/Hr simple cycle combustion turbine;

      (5) B005 – 1034 MMBtu/Hr simple cycle combustion turbine; and

      (6) B006 – 1034 MMBtu/Hr simple cycle combustion turbine..

      Note: Ohio EPA DAPC has completed proposed rule amendments for OAC Chapter 3745-14, specifically, OAC rule 3745-14-01 and OAC rule 3745-14-06, which facilitated the transition of the affected units from OAC Chapter 3745-14 into the federal Clean Air Interstate Rule (CAIR) program which began with the 2009 control periods. This began the process of “sunsetting” the

parts of OAC Chapter 3745-14 which were no longer needed as a result of Ohio's CAIR rules (OAC Chapter 3745-109). On July 6, 2010, US EPA announced the proposed CAIR replacement rule, the "Transport Rule" as required by the original court vacatur of the federal CAIR program in July 2008. The current time frame for the requirements of this program, as far as new state emission budgets, is beginning with the 2012 control periods.

b) The following regulated electrical generating units have been allocated the following CAIR allowances in the appropriate permittee's facility account as indicated below:

Emissions Unit Identification Number	Annual CAIR Allowance (tons) for years 2009 – 2014	Ozone Season Allowance (tons) for years 2009 – 2014
B001	20	12
B002	20	12
B003	22	14
B004	23	14
B005	24	15
B006	23	14

[OAC rules 3745-14-08(A)(2)(c) and 3745-14-08(A)(2)(d)]

6. Acid Rain Permits and Compliance – OAC chapter 3745-103

The permittee shall ensure that any affected unit complies with the requirements of OAC Chapter 3745-103, which includes submitting timely permit applications. Emissions exceeding any allowances that are lawfully held pursuant to this rule are prohibited. The requirements of this rule will be specified in the Title V and the Acid Rain permits issued to this facility.

7. All asbestos renovation and demolition activities conducted at this facility shall be performed in accordance with the applicable requirements specified in 40 CFR Part 61, Subpart M.

8. The facility is subject to the applicable requirements specified in OAC Chapter 3745-25. In accordance with Ohio EPA Engineering Guide #64, the emission control action programs, as specified in OAC rule 3745-25-03, shall be developed and submitted within 60 days after receiving notification from the Ohio EPA.

C. Emissions Unit Terms and Conditions

1. Emissions Unit Group - Combustion Turbines: B001, B002, B003, B004, B005, B006,

EU ID	Operations, Property and/or Equipment Description
B001	1034 MMBtu/Hr simple cycle combustion turbine w/ low NOx burner and water injection
B002	1034 MMBtu/Hr simple cycle combustion turbine w/ low NOx burner and water injection
B003	1034 MMBtu/Hr simple cycle combustion turbine w/ low NOx burner and water injection
B004	1034 MMBtu/Hr simple cycle combustion turbine w/ low NOx burner and water injection
B005	1034 MMBtu/Hr simple cycle combustion turbine w/ low NOx burner and water injection
B006	1034 MMBtu/Hr simple cycle combustion turbine w/ low NOx burner and water injection

For purposes of clarification, b) thru g) below are applicable to each of the listed above emissions unit group on an individual basis.

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 rules 3745-31-11 through 3745-31-20; and 40 CFR Part 52.21. Attainment Provisions for Prevention of Significant Deterioration (PSD) (PTI 14-01905)	The following emission limitations for Nitrogen Oxides (NOx) each emission unit shall not be exceeded: 261.4 pounds per hour of NOx*; when burning natural gas, NOx emissions shall not exceed 42 ppm by volume, at 15% oxygen, on a dry basis; and when burning LPG or diesel fuel, NOx emissions shall not exceed 65 ppm by volume, at 15% oxygen, on a dry basis. Pursuant to 40 CFR Part 60.332(f), each emissions unit is exempt from the NOx concentration emission limitations when ice fog, as defined in 40 CFR Part 60.331(f), is deemed a hazard by the permittee.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		The following emission limitations for Sulfur Dioxide (SO2) shall not be exceeded: when burning diesel fuel, emissions of SO2 shall not exceed 516.0 pounds per hour from each emissions unit*; when burning diesel fuel, the total combined SO2 emissions from emissions units B001-B006 shall not exceed 4911 lbs per 3-hour period and 22,152 lbs per 24-hour period; and when burning natural gas or LPG, SO2 emissions shall not exceed 0.015% by volume, at 15% oxygen, on a dry basis. The following emission limitations for particulate emissions (PE) and emissions of particulate matter 10 microns and less (PM10)** from each emissions unit shall not be exceeded; emissions of PE/PM10 from each emissions unit shall not exceed 40.4 lbs per hour*; and visible PE from any combustion turbine stack shall not exceed 10% opacity, as a 6-minute average, except for cold start-up and shutdown periods. Cold start-up shall be defined as the time necessary to bring each emissions unit on line from a cold state to turbine synchronization. **The total PM10 emissions were evaluated and did not trigger any additional federal requirements; therefore, the emissions are being regulated as particulate emissions (PE). Emissions of carbon monoxide (CO) from each emissions unit shall not exceed 25.34 pounds per hour*. Emissions of volatile organic compounds (VOC) from each emissions unit shall not

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		exceed 6.97 pounds per hour.* *The lbs/hr emission limitations established in PTI 14-01905 were based on the emissions unit's Potential to Emit (PTE). Therefore no hourly (short term) records are required to demonstrate compliance with these limitations. See b(2)a. and c(1) - c)(3).
b.	OAC rule 3745-31-05(A)(3) (PTI 14-01905)	See c)(4) and c)(5). Compliance with this rule also includes compliance with 40 CFR Part 52.21 and OAC rules 3745-31-11 through 3745-31-20.
c.	OAC rule 3745-17-07(A)	The visible particulate emission limitations specified in OAC rule 3745-17-07(A) are less stringent than the visible particulate emission limitation established in PTI 14-01905 pursuant to 40 CFR Part 52.21.
d.	OAC rule 3745-17-11(B)(4)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rules 3745-31-11 through 3745-31-20.
e.	OAC rule 3745-18-15(P)	The SO2 emission limitation specified by this rule (0.5 pound per million Btu) is less stringent than the SO2 emission limitation established pursuant to OAC rules 3745-31-11 through 3745-31-20.
f.	40 CFR Part 60, Subpart GG	The emission limitations established in 40 CFR Part 60, Subpart GG for SO2 and NOx are less stringent than those established pursuant to OAC rules 3745-31-11 through 3745-31-20.

(2) Additional Terms and Conditions

a. Best Available Control Technology (BACT):

i. For the PE/PM10 emissions from each emissions unit was determined to be burner design, combustion control, and compliance with the visible particulate emission limitation.

The total PM10 emissions were evaluated and did not trigger any additional federal requirements; therefore, the emissions are being regulated as particulate emissions (PE).

ii. The permittee shall operate and maintain dry low NOx burners when burning natural gas and operate and maintain a water injection system when burning diesel fuel.

iii. For the SO2 emissions from each emissions unit was determined to be use of a low sulfur content fuel and compliance with the SO2 emission limitations in b)(1)a.

iv. For the VOC emissions from each emissions unit was determined to be the low VOC emission rate and compliance with the operational restrictions.

v. For the CO emissions from each emissions unit was determined to be burner design.

b. For the purpose of this permit, the term “diesel fuel” shall be considered to be any low sulfur diesel fuel that is burned as defined in 40 CFR Part 72.2.

c) Operational Restrictions

(1) The sulfur content of the diesel fuel burned in each emissions unit shall not exceed 0.5%, by weight.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-11 through OAC rule 3745-31-20)

(2) The total combined amount of diesel fuel burned in emissions units B001 through B006 shall not exceed the amounts specified by the following equations:

For any 3-hour period:

gallons of diesel fuel = 35078 / S

where: S = the sulfur content of the diesel fuel, in percent, by weight

(e.g., if the diesel fuel sulfur content is 0.5%, then S = 0.5)

For any 24-hour period:

gallons of diesel fuel = 158228 / S

where: S = the sulfur content of the diesel fuel, in percent, by weight

(e.g., if the diesel fuel sulfur content is 0.5%, then S = 0.5).

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-11 through OAC rule 3745-31-20)

(3) The total combined operating hours for emissions units B001 through B006 shall not exceed 17,844 hours per rolling, 12-month period.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-11 through OAC rule 3745-31-20)

(4) The minimum stack height for each emissions unit shall be at least 213 feet above the ground.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

(5) The permittee shall burn only natural gas, LPG, and/or diesel fuel in each emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

d) Monitoring and/or Recordkeeping Requirements

(1) For each day during which the permittee burns a fuel other than natural gas, LPG, and/or diesel fuel, the permittee shall maintain a record of the type and quantity of fuel burned in each emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) The permittee shall operate and maintain a continuous monitoring system to monitor and record the fuel consumption and the ratio of water-to-fuel being fired in each emissions unit. This system shall be accurate to within plus or minus 5% and shall be approved by the Administrator of the U.S. EPA.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-11 through OAC rule 3745-31-20, and 40 CFR Part 60 Subpart GG)

(3) The permittee shall monitor and record the sulfur content of the natural gas and LPG being burned in each combustion turbine, B001 through B006 or make the demonstration that the sulfur content of the natural gas and LPG does not need to be monitored and recorded in accordance with the provisions specified in 40 CFR Part 60.334(h). Owners, operators or fuel vendors may develop custom fuel schedules for the determination of the sulfur content based on the design and operation of the affected facility and the characteristics of the fuel supply. Except as provided in 40 CFR Parts 60.334(i)(3)(i) and 60.334(i)(3)(ii), these custom schedules shall be substantiated with data and must be approved by the Ohio EPA, Central Office before they can be used.

Analyses for the purpose of determining the both of the nitrogen and sulfur content of the natural gas and LPG may be performed by the permittee, the fuel vendor, or any other qualified agency in accordance with the analytical methods specified in 40 CFR Part 60, Subpart GG, Section 60.335 or equivalent methods as approved by the Administrator.

(Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 60 Subpart GG)

(4) The permittee shall maintain records of the diesel fuel burned in each emissions unit in accordance with either Option 1 or Option 2 described below:

Option 1:

For each shipment of oil received for burning in each emissions unit, the permittee shall maintain records of the total quantity of oil received, the diesel fuel type (number 2, 4, or 6), the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

Option 2:

The permittee shall maintain records of the oil burned in each combustion turbine, B001 through B006 in accordance with either Alternative 1 or Alternative 2 described below:

Alternative 1:

For each shipment of oil received for burning in each combustion turbine, B001 through B006, the permittee shall collect or require the oil supplier to collect a representative grab sample of oil and maintain records of the total quantity of oil received, the permittee's or oil supplier's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F). A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads or pipeline deliveries may be represented by a single batch analysis from the supplier.

Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in each combustion turbine, B001 through B006 for each day when the emissions unit is in operation. If additional diesel fuel is added to the tank serving each combustion turbine, B001 through B006 on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the diesel fuel burned in each combustion turbine, B001 through B006. A representative grab sample of oil does not need to be collected on days when each combustion turbine, B001 through B006 is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide

emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with 40 CFR Part 60, Appendix A, Method 19, or the appropriate ASTM methods, such as ASTM methods D240 Standard Test Method for Heat of Combustion of Liquid Hydrocarbon Fuels by Bomb Calorimeter and D4294, Standard Test Method for Sulfur in Petroleum and Petroleum Products by Energy-Dispersive X-Ray Fluorescence Spectrometry, or equivalent methods as approved by the Director.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-11 through OAC rule 3745-31-20, OAC rule 3745-18-04(E)(3) and OAC rule 3745-18-04(I))

(5) The permittee shall collect and record the following information on a monthly basis:

a. the total hours of operation for each emissions unit;

b. the total combined hours of operation for emissions units B001 through B006; and

c. the rolling, 12-month summation of the total combined hours of operation for emissions units B001 through B006 (the summation of the current month's total combined hours of operation recorded in d)(5)b. added to the previous 11 months total combined hours of operation).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rules 3745-31-11 through OAC rule 3745-31-20)

(6) The permittee shall collect and record the following information:

a. the total combined number of gallons of diesel fuel supplied to emissions units B001 through B006 for all 3-hour periods of operation;

b. the percent sulfur content, by weight, of the diesel fuel supplied to emissions units B001 through B006 for all 3-hour periods of operation;

c. the total combined number of gallons of diesel fuel supplied to emissions units B001 through B006 for all 24-hour periods of operation;

d. the percent sulfur content, by weight, of the diesel fuel supplied to emissions units B001 through B006 for all 24-hour periods of operation;

e. the total combined SO2 emissions, in lbs, for emissions units B001 through B006 for all 3-hour periods of operation when burning diesel fuel. The SO2 emissions shall be calculated using the diesel fuel usage above, the diesel fuel sulfur and heat contents collected and recorded in d)(4) and the equations specified in OAC rule 3745-18-04(F);

f. the total combined SO2 emissions, in lbs, for emissions units B001 through B006 for all 24-hour periods of operation when burning diesel fuel. The SO2 emissions shall be calculated using the diesel fuel usage above, the diesel fuel sulfur and

heat contents collected and recorded in d)(4) and the equations specified in OAC rule 3745-18-04(F);

g. identification of each cold start-up for each emissions unit; and

h. identification of each shutdown for each emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rules 3745-31-11 through OAC rule 3745-31-20)

(7) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-01905: d)(1) through d)(6). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

(1) The permittee shall submit quarterly reports that identify each period during which an exemption for ice-fog provided in 40 CFR Part 60.332(f) is in effect. The report shall include the ambient conditions existing during the period, the date and time the air pollution control system was deactivated, and the date and time when the air pollution control system was reactivated.

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-11 through OAC rule 3745-31-20, and 40 CFR Part 60.334(j)(3))

(2) Pursuant to 40 CFR Parts 60.7 and 60.13(h), the permittee shall submit reports within 30 days following the end of each calendar quarter to the Hamilton County Department of Environmental Services - Air Quality Division documenting any 1-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio established during the most recent performance test that demonstrated that the emissions unit was in compliance with the applicable NOx emission limitations or any period during which the fuel-bound nitrogen of the fuel is greater than the maximum nitrogen content allowed by the fuel-bound nitrogen allowance used during the most recent performance test that demonstrated that the emissions unit was in compliance with the applicable NOx emission limitations. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, gas turbine load, and the nitrogen content of the fuel during the period of excess emissions. The graphs or figures developed under 40 CFR Part 60.335(a) shall also be submitted with each report.

The permittee shall submit reports within 30 days following the end of each calendar quarter to the Hamilton County Department of Environmental Services - Air Quality Division documenting any continuous water-to-fuel monitoring system downtime while the emissions unit was on line (date, time, duration and reason) along with any corrective action(s) taken. The permittee shall provide the emissions unit operating time during the reporting period and the date, time, reason and corrective action(s) taken for

each time period of emissions unit and control equipment malfunctions. The total operating time of the emissions unit and the total operating time of the continuous monitoring system while the emissions unit was on line shall also be included in the quarterly report.

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

(Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-11 through OAC rule 3745-31-20, and 40 CFR 60 Subpart GG)

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

a. any exceedance of the 3-hour and/or 24-hour total combined diesel fuel usage restrictions for emissions units B001 through B006 when burning diesel fuel;

b. any exceedance of the 3-hour and/or 24-hour SO2 emission limitations when burning diesel fuel for emissions units B001 through B006;

c. any exceedance of the total combined operating hours restriction for emissions units B001 through B006;

d. any exceedance of the 0.5%, by weight, diesel fuel sulfur content restriction for each emissions unit; and

e. each day when a fuel other than natural gas, LPG, and/or diesel fuel was burned in each emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rules 3745-31-11 through OAC rule 3745-31-20)

(4) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-01905: e)(1) through e)(3). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) and b)(2) shall be determined in accordance with the following methods:

a. Emission Limitation:

Emissions of PE/PM10 shall not exceed 40.4 lbs/hr.

Applicable Compliance Method:

This emission limitation reflects the emissions unit's potential to emit. Compliance with this emission limitation may be demonstrated through the emission factors and equations found in Table 2.3 of the technical support document submitted 8/25/89 for PSD Permit to Install 14-01905. The PE/PM10 emission factor in Table 2.3 of Permit to Install 14-01905 is 5.10 grams of PE/PM10 per second when burning diesel fuel, and 0.24 gram of PE/PM10 per second when burning natural gas or LPG.

If required, the permittee shall demonstrate compliance with the PE and PM10 emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5 while burning natural gas. Alternate U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rules 3745-31-11 through OAC rule 3745-31-20)

b. Emission Limitation:

Visible particulate emissions (PE) from any stack associated with the combustion turbines shall not exceed 10% opacity, as a 6-minute average.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rules 3745-31-11 through OAC rule 3745-31-20)

c. Emission Limitations:

NOx emissions shall not exceed 261.4 lbs/hr.

When burning natural gas, NOx emissions shall not exceed 42 ppm at 15% oxygen, on a dry basis.

When burning LPG or diesel fuel, NOx emissions shall not exceed 65 ppm at 15% oxygen, on a dry basis.

Applicable Compliance Method:

The hourly NOx emission limitation reflects the emissions unit's potential to emit. Compliance with this emission limitation may be demonstrated through the

emission factors and equations found in Table 2.3 of the technical support document submitted 8/25/89 for PSD Permit to Install 14-01905. The NOx emission factor in Table 2.3 of Permit to Install 14-01905 is 33.00 grams of NOx per second when burning diesel fuel, and 32.50 grams of NOx per second when burning natural gas or LPG.

If required, the permittee shall demonstrate compliance with the hourly emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7 while burning natural gas. Alternate U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

Compliance with the NOx concentration emission limitations may be demonstrated based upon the records required pursuant to d)(2).

If required, the permittee shall demonstrate compliance with the NOx concentration emission limitations in accordance with the methods and procedures specified in 40 CFR Part 60.335.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rules 3745-31-11 through OAC rule 3745-31-20 and 40 CFR 60 Subpart GG)

d. Emission Limitations:

When burning diesel fuel, SO2 emissions shall not exceed 516 lbs/hr from each emissions unit.

When burning diesel fuel, the total combined SO2 emissions from emissions units B001 through B006 shall not exceed 4911 lbs per 3-hour period and 22,152 lbs per 24-hour period.

When burning natural gas or LPG, SO2 emissions shall not exceed 0.015%, by volume, at 15% oxygen on a dry basis from each emissions unit.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rules 3745-31-11 through OAC rule 3745-31-20)

Applicable Compliance Method:

The hourly SO2 emission limitation reflects the emissions unit's potential to emit. Compliance with this emission limitation may be demonstrated through the emission factors and equations found in Table 2.3 of the technical support document submitted 8/25/89 for PSD Permit to Install 14-01905. The SO2 emission factor in Table 2.3 of Permit to Install 14-01905 is 65.13 grams of SO2 per second when burning diesel fuel, and 0.00 gram of SO2 per second when burning natural gas or LPG.

If required, the permittee shall demonstrate compliance with the hourly emission limitation and the SO2 concentration through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 6 while

burning natural gas. Alternate U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

Compliance with the total combined 3-hour and 24-hour SO2 emission limitations for emissions units B001 through B006 may be demonstrated based upon the records required pursuant to d)(6).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rules 3745-31-11 through OAC rule 3745-31-20 and 40 CFR 60 Subpart GG)

e. Emission Limitation:

CO emissions shall not exceed 25.34 lbs/hr.

Applicable Compliance Method:

This emission limitation reflects the emissions unit's potential to emit. Compliance with this emission limitation may be demonstrated through the emission factors and equations found in Table 2.3 of the technical support document submitted 8/25/89 for PSD permit 14-01905. The CO emission factor in Table 2.3 of Permit to Install 14-01905 is 3.20 grams of CO per second when burning diesel fuel, natural gas, or LPG.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10 while burning natural gas. Alternate U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rules 3745-31-11 through OAC rule 3745-31-20)

f. Emission Limitation:

VOC emissions shall not exceed 6.97 lbs/hr.

Applicable Compliance Method:

This emission limitation reflects the emissions unit's potential to emit. Compliance with this emission limitation may be demonstrated through the emission factors and equations found in Table 2.3 of the technical support document submitted 8/25/89 for PSD permit 14-01905. The VOC emission factor in Table 2.3 of Permit to Install 14-01905 is 0.88 gram of VOC per second when burning diesel fuel, natural gas, or LPG.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25 while burning natural gas. Alternate U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rules 3745-31-11 through OAC rule 3745-31-20)

(2) Upon initial use of diesel fuel, the permittee shall conduct, or have conducted, emission testing for each emissions unit to demonstrate compliance with the applicable PE/PM10, NOx, SO2, VOC, and CO emission limitations in accordance with the following requirements:

The emission testing shall be conducted within 90 days of initiating diesel fuel firing, unless an alternative schedule is submitted and approved by Hamilton County Department of Environmental Services-Air Quality Control Division. The frequency for future emission testing while burning diesel fuel will be determined based upon the results of the initial emission tests and the procedures specified in Ohio EPA Engineering Guide 16.

Compliance with the applicable PE/PM10, NOx, SO2, VOC, and CO emission limitations shall be determined in accordance with the following:

for PE/PM10 - 40 CFR Part 60, Appendix A, Methods 1 through 5;

for NOx (hourly) - 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7;

for NOx (concentration) - 40 CFR Part 60, Appendix A, Method 20

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

for VOC - 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25; and

for CO - 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10.

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

Testing for PE/PM10, NOx, and SO2 shall be performed on each emissions unit. Testing for CO and VOC shall be performed on one emissions unit that is representative of the permitted combustion turbine units (B001 through B006). Prior to performing CO and VOC testing, the permittee shall obtain agreement on the emissions unit to be tested as a representative unit from the Hamilton County Department of Environmental Services-Air Quality Control Division.

The tests shall be conducted while the emissions unit is operating at or near its maximum capacity.

Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Hamilton County Department of Environmental Services. 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 Hamilton County Department of Environmental Services' refusal to accept the results of the emission test(s).

Personnel from the Hamilton County Department of Environmental Services and Ohio EPA shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

A comprehensive written report on the results of the emission test(s) shall be signed by the person or persons responsible for the tests and submitted to the Hamilton County Department of Environmental Services 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 Hamilton County Department of Environmental Services.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rules 3745-31-11 through OAC rule 3745-31-20)

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-01905: f)(1) through f)(2). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install.

g) Miscellaneous Requirements

(1) None.

2. Emissions Unit Group - Vaporizing Boilers: B013, B014, B015, B016, B017, B018,

EU ID	Operations, Property and/or Equipment Description
B013	21 MMBtu/Hr LPG fired vaporizing boiler with low NOx burners
B014	21 MMBtu/Hr LPG fired vaporizing boiler with low NOx burners
B015	21 MMBtu/Hr LPG fired vaporizing boiler with low NOx burners
B016	21 MMBtu/Hr LPG fired vaporizing boiler with low NOx burners
B017	21 MMBtu/Hr LPG fired vaporizing boiler with low NOx burners
B018	21 MMBtu/Hr LPG fired vaporizing boiler with low NOx burners

For purposes of clarification, b) thru g) below are applicable to each of the listed above emissions unit group on an individual basis.

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 rules 3745-31-11 through 3745-31-20; and 40 CFR Part 52.21. Attainment Provisions for Prevention of Significant Deterioration (PSD) (PTI 14-01905)	Nitrogen Oxides (NOx) emissions from each emission unit shall not be exceed 12.4 lbs/1000 gallons of LPG burned.* Particulate emissions (PE) and emissions of particulate matter 10 microns and less (PM10)** from each emission unit shall not exceed 0.27 lb/1000 gallons of LPG burned.* **The total PM10 emissions were evaluated and did not trigger any additional federal requirements; therefore, the emissions are being regulated as particulate emissions (PE). Carbon monoxide (CO) emissions from each emissions unit shall not exceed 3.1 lbs/1000 gallons of LPG burned.* Volatile organic compounds (VOC)

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		emissions from each emissions unit shall not exceed 0.25 lb/1000 gallons of LPG burned.* *The lbs/1000 gallons of LPG burned emission limitations established in PTI 14-01905 were based on each of the emissions unit's Potential to Emit (PTE). Therefore no hourly (short term) records are required to demonstrate compliance with these limitations. See b(2)a. and c)(1).
b.	OAC rule 3745-31-05(A)(3) (PTI 14-01905)	See c)(2) and c)(3). Compliance with this rule also includes compliance with 40 CFR Part 52.21 and OAC rules 3745-31-11 through 3745-31-20.
c.	OAC rule 3745-17-07(A)	Visible particulate emissions shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
d.	OAC rule 3745-17-10(B)	The PE limitation specified by this rule is less stringent than the PE limitation established pursuant to OAC rules 3745-31-11 through 3745-31-20.

(2) Additional Terms and Conditions

a. Best Available Control Technology (BACT):

i. The permittee shall operate and maintain dry low NOx burners.

ii. For the CO, VOC, and SO2 emissions from each emissions unit was determined to be burner design, combustion control, and the use of LPG fuel.

c) Operational Restrictions

(1) The total combined amount of LPG burned in emissions units B013 through B018 shall not exceed 4.9 million gallons per year based on a rolling, 12-month summation.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-11 through OAC rule 3745-31-20)

(2) The minimum stack height for each emissions unit shall be at least 80 feet above the ground.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

(3) The permittee shall burn only LPG in each emissions unit.

(Authority for term: OAC rule 3745-77-07(A)(1) and OAC rule 3745-31-05(A)(3))

d) Monitoring and/or Recordkeeping Requirements

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

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rule 3745-31-05(A)(3))

(2) The permittee shall collect and record the following information on a monthly basis:

a. the total combined amount of LPG gas burned in emissions units B013 through B018; and

b. the rolling, 12-month summation of the total combined amount of LPG gas burned in emissions units B013 through B018 (the summation of the current month's total combined amount of LPG gas burned recorded in line d)(2)a. added to the previous 11 months total combined amount of LPG gas burned).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rules 3745-31-11 through OAC rule 3745-31-20)

(3) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following monitoring and record keeping requirements are as stringent as or more stringent than the monitoring and record keeping requirements contained in Permit to Install #14-01905: d)(1) through d)(2). The monitoring and record keeping requirements contained in the above-referenced Permit to Install are subsumed into the monitoring and record keeping requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying monitoring and record keeping requirements in the Permit to Install.

e) Reporting Requirements

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

a. each day when a fuel other than LPG was burned in each emissions unit; and

b. any monthly record which shows an exceedance of the LPG usage restriction specified in c)(1).

The permittee shall submit quarterly deviation reports pursuant to Standard Terms and Conditions.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rules 3745-31-11 through OAC rule 3745-31-20)

(2) Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following reporting requirements are as stringent as or more stringent than the reporting requirements contained in Permit to Install #14-01905: e)(1). The reporting requirements contained in the above-referenced Permit to Install are subsumed into the reporting requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying reporting requirements in the Permit to Install.

f) Testing Requirements

(1) Compliance with the emission limitations in b)(1) and b)(2) shall be determined in accordance with the following methods:

a. Emission Limitation:

PE/PM10 shall not exceed 0.27 lb/1000 gallons of LPG burned.

Applicable Compliance Method:

This emission limitation reflects the emissions units' potential to emit. Compliance with this emission limitation may be demonstrated through the emission factors and equations found in Table 2.3 of the technical support document submitted 8/25/89 for PSD Permit to Install 14-01905. The PE/PM10 emission factor in Table 2.3 of Permit to Install 14-01905 is 0.015 gram of PE/PM10 per second when burning LPG.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 5. Alternate U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rules 3745-31-11 through OAC rule 3745-31-20)

b. Emission Limitation:

NOx emissions shall not exceed 12.4 lbs/1000 gallons of LPG burned.

Applicable Compliance Method:

This emission limitation reflects the emissions units' potential to emit. Compliance with this emission limitation may be demonstrated through the emission factors and equations found in Table 2.3 of the technical support document submitted 8/25/89 for PSD Permit to Install 14-01905. The NOx emission factor in Table 2.3 of Permit to Install 14-01905 is 0.43 gram of NOx per second when burning LPG.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7. Alternate U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rules 3745-31-11 through OAC rule 3745-31-20)

c. Emission Limitation:

CO emissions shall not exceed 3.1 lbs/1000 gallons of LPG burned.

Applicable Compliance Method:

This emission limitation reflects the emissions units' potential to emit. Compliance with this emission limitation may be demonstrated through the emission factors and equations found in Table 2.3 of the technical support document submitted 8/25/89 for PSD permit 14-01905. The CO emission factor in Table 2.3 of Permit to Install 14-01905 is 0.108 gram of CO per second when burning LPG.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 10. Alternate U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rules 3745-31-11 through OAC rule 3745-31-20)

d. Emission Limitation:

VOC emissions shall not exceed 0.25 lb/1000 gallons of LPG burned.

Applicable Compliance Method:

This emission limitation reflects the emissions units' potential to emit. Compliance with this emission limitation may be demonstrated through the emission factors and equations found in Table 2.3 of the technical support document submitted 8/25/89 for PSD permit 14-01905. The VOC emission factor in Table 2.3 of Permit to Install 14-01905 is 0.009 gram of VOC per second when burning LPG.

If required, the permittee shall demonstrate compliance with this emission limitation through emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 25. Alternate U.S. EPA-approved test methods may be used with prior approval from the Ohio EPA.

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rules 3745-31-11 through OAC rule 3745-31-20)

e. Emission Limitation:

Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by rule.

Applicable Compliance Method:

If required, compliance with this emission limitation shall be demonstrated through visible emission observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

(Authority for term: OAC rule 3745-77-07(C)(1) and OAC rules 3745-17-03(B)(1)

f. Pursuant to OAC Rule 3745-77-07(A)(3)(a)(ii), the following testing requirements are as stringent as or more stringent than the testing requirements contained in Permit to Install #14-01905: f)(1). The testing requirements contained in the above-referenced Permit to Install are subsumed into the testing requirements of this operating permit, so that compliance with these requirements constitutes compliance with the underlying testing requirements in the Permit to Install

g) Miscellaneous Requirements

(1) None.