



State of Ohio Environmental Protection Agency

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**RE: FINAL PERMIT TO INSTALL MODIFICATION
MIAMI COUNTY
Application No: 08-01731**

CERTIFIED MAIL

	TOXIC REVIEW
	PSD
Y	SYNTHETIC MINOR
	CEMS
	MACT
	NSPS
	NESHAPS
	NETTING
	MAJOR NON-ATTAINMENT
	MODELING SUBMITTED
	GASOLINE DISPENSING FACILITY

DATE: 11/19/2002

Piqua Municipal Power System Sub 5
Roger Wehrman
919 S Main St
Piqua, OH 453563837

Enclosed Please find a modification to the Ohio EPA Permit To Install referenced above which will modify the terms and conditions.

You are hereby notified that this action by the Director is final and may be appealed to the Ohio Environmental Review Appeals Commission pursuant to Chapter 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. It must be filed within thirty (30) days after the notice of the Directors action. A copy of the appeal must be served on the Director of the Ohio Environmental Protection Agency within three (3) days of filing with the Commission. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
236 East Town Street, Room 300
Columbus, Ohio 43215

Very truly yours,

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

cc: USEPA

RAPCA



FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 08-01731

Application Number: 08-01731

APS Premise Number: 0855780419

Permit Fee: \$0

Name of Facility: Piqua Municipal Power System Sub 5

Person to Contact: Roger Wehrman

Address: 919 S Main St
Piqua, OH 453563837

Location of proposed air contaminant source(s) [emissions unit(s)]:
9020 County Rd North 25A
Piqua, Ohio

Description of proposed emissions unit(s):
administrative modification to change emission factors and allowables.

The above named entity is hereby granted a modification to the permit to install described above pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this modification does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described source(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 included in the application, the above described source(s) of pollutants will be granted the necessary operating permits.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

Part I - GENERAL TERMS AND CONDITIONS

A. Permit to Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements Related to Monitoring and Recordkeeping Requirements

The permittee shall submit required reports in the following manner:

- a. Reports of any required monitoring and/or recordkeeping 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 (a) any deviations (excursions) from 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 appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Records Retention Requirements

Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

4. 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.

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 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).

6. 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.

7. 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.

8. Termination of Permit to Install

This Permit to Install shall terminate within eighteen months of the effective date of the Permit to Install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. 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.

9. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions

and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. 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 the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install 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.

10. 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.

11. 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).

12. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

13. Source Operation and Operating Permit Requirements After Completion of Construction

- a. If 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).

- b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within thirty (30) days after commencing operation of the source(s) covered by this permit.

14. Construction Compliance Certification

The applicant shall provide Ohio EPA with a written certification (see enclosed form) that the facility has been constructed in accordance with the Permit to Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

15. 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 this Permit to Install.

B. Permit to Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

**SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS**

<u>Pollutant</u>	<u>Tons Per Year</u>
NOx	49.35
SO2	28.32
Particulates	0.67
OC	0.23
CO	0.19

PART II - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

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

<u>Operations, Property, and/or Equipment</u>	<u>Applicable Rules/Requirements</u>	<u>Applicable Emissions Limitations/Control Measures</u>
B001 - 250 mmBtu/hr No. 2 oil-fired turbine generator	OAC rule 3745-31-05(A)(3)	3.0 lbs/hr particulates 0.83 lb/hr CO 1.0 lbs/hr organic compounds (OC) 126 lbs/hr SO2 220 lbs/hr NOx Visible emissions not to exceed 5% opacity. The requirements of this rule also include compliance with the requirements of OAC rule 3745-35-07(B).
	OAC rule 3745-35-07(B)	See Section B.1-2. below 0.67 TPY particulates 0.19 TPY CO 0.23 TPY organic compounds (OC) 28.32 TPY SO2 49.35 TPY NOx See Section B.3. below

2. Additional Terms and Conditions

- 2.a The lbs/hr emission limitations listed in Section A.1. for particulates, CO, OC, SO2, and NOx were developed for PTI purposes to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop record keeping and/or reporting requirements to ensure compliance with these limits.

B. Operational Restrictions

1. The permittee shall burn only No. 2 fuel oil in this emissions unit.
2. The sulfur content of the No. 2 fuel oil burned in this emissions unit shall not exceed 0.5%, by weight.
3. The hours of operation for this emissions unit shall not exceed 200 hours in any one calendar month and shall not exceed 448 hours on a rolling, 12-month basis. The permittee has sufficient records to demonstrate compliance with this rolling summation such that a first 12 month cumulative table is not required.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for this emissions unit:
 - a. The type and quantity, in gallons, of fuel burned.
 - b. The sulfur content, in percent by weight, of each shipment of fuel burned.
 - c. The hours of operation for the calendar month.
 - d. The hours of operation calculated as a rolling, 12-month summation.
2. The permittee shall collect or require the oil supplier to collect a representative grab sample for each shipment of oil that is received for burning in this emissions unit. The permittee shall perform or require the supplier to perform the analyses for sulfur content in accordance with the following ASTM methods: ASTM method D4294, ASTM method D240, or ASTM method 6010 for sulfur content. Alternative, equivalent methods may be used upon written approval by the appropriate Ohio EPA District Office or local air agency.
3. For each shipment of oil received for burning in this emissions unit, the permittee shall maintain records of the total quantity of oil received and the permittee's or oil supplier's analyses for sulfur content.

D. Reporting Requirements

1. The permittee shall submit quarterly deviation (excursion) reports, in accordance with Section A.2. of the General Terms and Conditions, and shall include the following information:
 - a. An identification of each month during which the hours of operation exceeded 200 hours/month, and the actual hours of operation for each such month.

- b. An identification of each month during which the rolling, 12-month summation of hours of operation exceeded 448 hours and the actual rolling, 12-month summation of operating hours for each such month.
2. The permittee shall submit deviation (excursion) reports that identify each month when a fuel other than no. 2 fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
3. The permittee shall submit, on a quarterly basis, copies of the permittee's or oil supplier's analyses for each shipment of oil which is received for burning in this emissions unit. The permittee's or oil supplier's analyses shall document the sulfur content (percent) for each shipment of oil. These quarterly reports shall be submitted by February 15, May 15, August 15, and November 15 of each year and shall cover the oil shipments received during the previous calendar quarters.

E. Testing Requirements

1. Compliance with the emission limitations in Section A.1. of these terms and conditions shall be determined in accordance with the following methods:
 - a. Emission Limitation -
3.0 lbs/hr particulates

Applicable Compliance Method -
Compliance shall be determined by multiplying the maximum hourly No.2 fuel usage of 1.801×10^3 gallons by the AP-42 emission factor (Chapter 3.1, updated April 2000) of 1.67
lbs particulates/ 10^3 gallons.
 - b. Emission Limitation -
0.67 TPY particulates

Applicable Compliance Method -
Compliance shall be based upon the record keeping specified in Section C.1 of this permit and shall be the sum of the monthly No.2 fuel usage for the calendar year multiplied by the AP-42 emission factor (Chapter 3.1, updated April 2000) of 1.67 lbs particulates/ 10^3 gallons, and divided by 2000 lbs/ton.
 - c. Emission Limitation -
0.83 lbs/hr CO

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly No.2 fuel usage of 1.801×10^3 gallons by the AP-42 emission factor (Chapter 3.1, updated April 2000) of 0.46

lbs CO/ 10^3 gallons.

- d. Emission Limitation -
0.19 TPY CO

Applicable Compliance Method -

Compliance shall be based upon the record keeping specified in Section C.1 of this permit and shall be the sum of the monthly No.2 fuel usage for the calendar year multiplied by the AP-42 emission factor (Chapter 3.1, updated April 2000) of 0.46 lbs CO/ 10^3 gallons, and divided by 2000 lbs/ton.

- e. Emission Limitation -
1.0 lbs/hr OC

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly No.2 fuel usage of 1.801×10^3 gallons by the AP-42 emission factor (Chapter 3.1, updated April 2000) of 0.56

lbs OC/ 10^3 gallons.

- f. Emission Limitation -
0.23 TPY OC

Applicable Compliance Method -

Compliance shall be based upon the record keeping specified in Section C.1 of this permit and shall be the sum of the monthly No.2 fuel usage for the calendar year multiplied by the AP-42 emission factor (Chapter 3.1, updated April 2000) of 0.56 lbs OC/ 10^3 gallons, and divided by 2000 lbs/ton.

- g. Emission Limitation -
126 lbs/hr SO₂

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly No.2 fuel usage of 1.801×10^3 gallons by the AP-42 emission factor (Chapter 3.1, updated April 2000) of $140.4 \times (S)$ lbs SO₂/ 10^3 gallons, where S = percent sulfur in fuel.

- h. Emission Limitation -
28.32 TPY SO₂

Applicable Compliance Method -

Compliance shall be based upon the record keeping specified in Section C.1 of this permit and shall be the sum of the monthly No.2 fuel usage for the calendar year multiplied by the AP-42 emission factor (Chapter 3.1, updated April 2000) of 140.4 x (S) lbs SO₂/10³ gallons, where S = percent sulfur in fuel. The product shall then be divided by 2000 lbs/ton.

- i. Emission Limitation -
220 lbs/hr NO_x

Applicable Compliance Method -

Compliance shall be determined by multiplying the maximum hourly No.2 fuel usage of 1.801 x 10³ gallons by the AP-42 emission factor (Chapter 3.1, updated April 2000) of 122.32 lbs NO_x/10³ gallons.

- j. Emission Limitation -
49.35 TPY NO_x

Applicable Compliance Method -

Compliance shall be based upon the record keeping specified in Section C.1 of this permit and shall be the sum of the monthly No.2 fuel usage for the calendar year multiplied by the AP-42 emission factor (Chapter 3.1, updated April 2000) of 122.32 lbs NO_x/10³ gallons, and divided by 2000 lbs/ton.

- k. Emission Limitation -
Visible emissions not to exceed 5% opacity

Applicable Compliance Method -

Compliance shall be determined by visible emission evaluations performed in accordance with OAC rule 3745-17-03(B)(1) using the methods and procedures specified in USEPA Reference Method 9.

- l. Operational Limitation -
Hours of operation shall not exceed 200 hours in any one calendar month

Applicable Compliance Method -

Compliance shall be based upon the record keeping specified in Section C.1 of this permit.

- m. Operational Limitation -
Hours of operation shall not exceed 448 hours on a rolling, 12-month basis

Applicable Compliance Method -

Compliance shall be based upon the record keeping specified in Section C.1 of this permit.

n. Operational Limitation -

Sulfur content of the No. 2 fuel oil burned in this emissions unit shall not exceed 0.5%, by weight

Applicable Compliance Method -

Compliance shall be based upon the record keeping specified in Section C.1 of this permit.

F. Miscellaneous Requirements

None