



State of Ohio Environmental Protection Agency

Street Address:

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

TELE: (614) 644-3020 FAX: (614) 644-2329

Mailing Address:

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

**RE: FINAL PERMIT TO INSTALL MODIFICATION
CRAWFORD COUNTY
Application No: 03-13390**

CERTIFIED MAIL

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

DATE: 5/15/2001

PG&E Dispersed Generating Company, LLC
Greg Filippelli
7500 Old Georgetown Road
Bethesda, MD 20814

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,

Thomas G. Rigo, Manager
Field Operations and Permit Section
Division of Air Pollution Control

cc: USEPA

NWDO



FINAL ADMINISTRATIVE MODIFICATION OF PERMIT TO INSTALL 03-13390

Application Number: 03-13390

APS Premise Number: 0317030060

Permit Fee: **\$200**

Name of Facility: PG&E Dispersed Generating Company, LLC

Person to Contact: Greg Filippelli

Address: 7500 Old Georgetown Road
Bethesda, MD 20814

Location of proposed air contaminant source(s) [emissions unit(s)]:

**900 South Street
Galion, Ohio**

Description of proposed emissions unit(s):

Modification to allow for significant changes in the testing requirements.

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	57.3
PE	11.4
SO2	4.6
CO	96.7
VOC	7.4

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
P001 - GE Frame 5LA natural gas fired combustion turbine with a nominal capacity of 16.5 MW controlled with a selective catalytic reduction (SCR) system	OAC rule 3745-31-05(A)(3)	nitrogen oxides (NO _x) emissions shall not exceed 14 ppmvd at 15% Oxygen 13.12 lbs NO _x /hr 0.0140 lb particulate emissions (PE)/MM Btu heat input 3.56 lbs PE/hr & 4.0 tons PE/yr 0.0057 lb sulfur dioxide (SO ₂)/MM Btu heat input 1.45 lbs SO ₂ /hr & 1.6 tons SO ₂ /yr 0.1120 lbs carbon monoxide (CO)/MM Btu heat input 28.47 lbs CO/hr 2.29 lbs volatile organic compounds (VOC)/hr & 2.6 tons VOC/yr 0.18 lb formaldehyde/hr & 0.2 tons formaldehyde/yr Startup and shutdown emissions: 2.5 tons NO _x /yr

	1.0 ton CO/yr
	Visible particulate emissions from any stack shall not exceed 10 percent opacity as a six-minute average
OAC Rule 3745-31-05 (D) Synthetic Minor to avoid Prevention of Significant Deterioration (PSD) and Title V requirements	operational restriction, see B. 1. 14.8 tons NO _x per rolling 12 month period
	32.0 tons CO per rolling 12 month period
OAC Rule 3745-17-11 (B)(4)	see A.2.a.
OAC Rule 3745-17-07	see A.2.a.
OAC rule 3745-18-06(F)	see A.2.a.
40 CFR part 60, Subpart GG	see A.2.b.

2. Additional Terms and Conditions

- 2.a** The emissions limit based on this applicable rule is equivalent to or less stringent than the limit established pursuant to OAC rule 3745-31-05.
- 2.b** The emissions limits based on this applicable rule are equivalent to or less stringent than the limits established pursuant to OAC rule 3745-31-05. Except as provided for in the terms and conditions in this permit, the permittee is not exempt from meeting any additional requirements of 40 CFR Part 60, Subpart GG.

B. Operational Restrictions

- 1. The maximum annual hours of operation for emissions unit P001 shall not exceed 2,250 hours*, based upon a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months following the startup of this emissions unit the permittee shall not exceed the monthly hours of operation restrictions specified in the following table:

Month	Cumulative hours of Operation
1	400
1-2	800
1-3	1200
1-4	1600
1-5	2000
1-12	2,250

After the first 12 calendar months following the startup of emissions unit P001, compliance with the annual hours of operation restriction shall be based on a rolling, 12-month summation.

* This annual restriction includes start-ups and shutdowns periods as they are described in condition B.3. The maximum annual hours of start-ups and shutdowns shall not exceed 125 hours per year.

2. The permittee shall burn only natural gas in this emissions unit. The maximum sulfur content of the natural gas shall not exceed 0.0068 percent by weight.
3. As specified in the permittee's PTI application, the maximum heat input rating of this emissions unit is 254.2 MM Btu/hr. This value corresponds to a maximum NG flow of 254,216 cf/hr with a heat content of 1000 Btu/cf. The permittee shall operate this emissions unit within the parameters specified above, except for startup and shutdown. Start-up shall be defined as the time necessary to bring the SCR unit to its minimum operating temperature (as recommended by the vendor), but under no circumstances shall it exceed 60 minutes in duration. Shutdown periods shall not exceed 30 minutes in duration.
4. With the exception of startup and shutdown, emissions unit P001 shall be operated at 100% load. The permittee may petition the Ohio EPA to operate at a greater load range if it can demonstrate to the agency's satisfaction that the emissions unit will comply with all applicable emission limits in this permit.
5. The emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: Formaldehyde

TLV (ug/m3): 273 (Converted from the STEL)

Maximum Hourly Emission Rate (lbs/hr): 0.52*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.38

MAGLC (ug/m3): 6.49

Pollutant: Sulfuric Acid

TLV (ug/m3): 1000

Maximum Hourly Emission Rate (lbs/hr): 1.43*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3.81

MAGLC (ug/m3): 23.8

Pollutant: Ammonia

TLV (ug/m3): 17000

Maximum Hourly Emission Rate (lbs/hr): 11.2*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.7

MAGLC (ug/m3): 404.8

* This was modeled for emissions units P001 & P002 combined.

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
 - b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
 - c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,
 - d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
6. The Ohio EPA will not consider any of the above-mentioned as a "modification" requiring a permit to install, if the following conditions are met:
- a. the change is not otherwise considered a "modification" under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,

- c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the operating hours;
 - b. during the first 12 calendar months of operation, the permittee shall record the cumulative operating hours for each calendar month; and
 - c. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the operating hours.
 - d. in lb(s)/hr emissions rate* for NO_x and CO;
 - e. during the first 12 calendar months of operation, the cumulative NO_x and CO emissions, in tons (b x d, for each pollutant); and
 - f. beginning after the first 12 calendar months of operation, the rolling, 12-month NO_x and CO emissions, in tons (c x d, for each pollutant).

* As determined by the most recent testing data or continuous monitoring data available for each pollutant.

2. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the number of operating hours which included startups and shutdowns;
 - b. in lb(s)/hr emissions rate* for NO_x and CO;
 - c. the NO_x and CO emissions, in tons (a x b, for each pollutant); and
 - d. the annual, year-to-date NO_x and CO emissions associated with startups and shutdowns, in tons (summation of c, for each pollutant).

* The permittee shall use 38.0 lbs NO_x/hr and 13.0 lbs CO/hr as the emission factors for the additional emissions associated with startup and shutdown periods, or as determined by testing data or continuous monitoring data that becomes available for this emissions unit.

3. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
4. The information management system for this emissions unit shall be capable of monitoring and recording fuel flow in cu ft or million cu ft per hour.
5. The permittee shall determine compliance with the sulfur content standard as follows: ASTM D 2880-71 shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-80, D 3031-81, D 4084-82, or D 3246-81 shall be used for the sulfur content of gaseous fuels. The permittee shall determine the heat content of the fuels using ASTM method D240. The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Ohio EPA, Central Office. The newest or most recent revisions to the applicable test method shall be used for these analyses. Alternative, equivalent methods may be used if they comply with the requirements specified in 40 CFR Part 60.13, or upon written approval by the Ohio EPA, Central Office. The frequency of the sampling shall be such that it complies with the requirements specified in 40 CFR Part 60.334. A custom fuel monitoring schedule may be used if approved by the Ohio EPA, Northwest District Office.
6. Except for periods described in 40 CFR part 60.13, the permittee shall install, operate, and maintain equipment to continuously monitor* and record NO_x from this emissions unit in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified by the Ohio EPA (typically compliance with portions of 40 CFR Part 60.13 and 40 CFR Part 75).

The permittee shall maintain records of all data obtained by the continuous NO_x monitoring system including, but not limited to, parts per million NO_x on an instantaneous (one-minute) basis, emissions of NO_x in units of the applicable standard (with an hourly averaging period), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

* The installation and operation of systems to continuously monitor and record emissions of NO_x may be performed in lieu of monitoring the nitrogen content of the natural gas being fired in the turbine, as required by 40 CFR 60.334(b).

7. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and

- b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative operating hours levels. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).
3. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031 and 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 appropriate Ohio EPA District Office or local air agency documenting the date, commencement and completion times, duration, magnitude, reason (i.e., startup and shutdown periods as defined in Condition B.3. above, malfunctions, etc.), and corrective actions taken (if any), of all instances of NO_x values in excess of the applicable limits specified in the terms and conditions of this permit. These reports shall also contain the total NO_x emissions for the calendar quarter (in tons).

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

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

4. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031, the permittee shall submit a summary of the excess emission report pursuant to 40 CFR Part 60.7. The summary shall be submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following the end of each calendar quarter in a manner prescribed by the Director.

5. The permittee shall submit deviation (excursion) reports that identify any record which shows that the sulfur content of the natural gas exceeded 0.0068 percent by weight. These reports are due by the date described in Part I - General Terms and Conditions of this permit under section (A)(2).
6. The permittee shall submit deviation (excursion) reports that identify each time when this emissions unit was not in compliance with the requirements of condition B.3. above. These reports are due by the date described in Part I - General Terms and Conditions of this permit under section (A)(2).
7. In lieu of the excess emissions reports required under 40 CFR Part 60.334, the permittee shall submit excess and emissions reports for emissions unit P001 in accordance with this permit.
8. Pursuant to 40 CFR Part 60.7, the permittee is hereby advised of the requirement to report the following at the appropriate times:
 - a. construction date (no later than 30 days after such date);
 - b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
 - c. actual start-up date (within 15 days after such date); and,
 - d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P. O. Box 163669
Columbus, Ohio 43216-3669

and

Ohio Environmental Protection Agency
Northwest District Office
Division of Air Pollution Control
347 North Dunbridge Road
Bowling Green, Ohio 43402

This emissions unit is subject to the applicable provisions of Subpart GG of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable."

E. Testing Requirements/Compliance Methods Determinations

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing* shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the NO_x outlet concentration, and the lbs/MM Btu limitations for CO and SO₂**.
 - c. The emission testing shall also be conducted to demonstrate compliance with the mass emissions limitations for NO_x, SO₂, CO, Formaldehyde, VOC, and PE. Mass rate emissions testing shall be conducted on a minimum of one of six emissions units included in PTI #s 03-13390, 03-13389, and 03-13377. Emissions testing shall be conducted under "worst case" conditions on the "worst case" emissions unit. As part of the stack test submittal or in other documentation, the permittee shall provide information outlining how the proposed mass rate emission testing represents "worst case" conditions on the "worst case" emissions unit.
 - d. The following test method(s) shall be employed to demonstrate compliance with the above emissions limitations: for NO_x, Method 20 of 40 CFR Part 60, Appendix A; for PE, Method 5 of 40 CFR Part 60, Appendix A; for Formaldehyde, SW-846 Method 0011, Appendix A; for VOC Method 25 of 40 CFR Part 60, Appendix A; for SO₂, Method 20 of 40 CFR Part 60, Appendix A; and for CO, Method 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - e. The testing shall be performed at peak load (as defined by 40 CFR part 60.331), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emission test(s).
 - g. Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

* In lieu of the test methods and procedures required under 40 CFR Part 60.335, the permittee shall follow the testing requirements in accordance with this permit.

**In lieu of the initial SO₂ emissions testing required above, the permittee may sample the Sulfur content of the fuel as provided for in 40 CFR Subpart GG.

2. Within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit, the permittee shall conduct certification tests of the continuous NO_x monitoring system pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6* . Personnel from the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the appropriate Ohio EPA District Office or local air agency within 30 days after the test is completed. Copies of the test results shall be sent to the appropriate Ohio EPA District Office or local air agency and the Ohio EPA, Central Office. Certification of the continuous NO_x monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6* .

*If approved by the Ohio EPA Central Office, the permittee may use 40 CFR Part 60, Appendix B, Performance Specification 2 in conjunction with a fuel flow monitor as described in 40 CFR Part 75 to meet this requirement.

3. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:

- a. Emission Limitation
NO_x emissions shall not exceed 14 ppmvd at 15% Oxygen

13.12 lbs NO_x/hr & 14.8 tons NO_x per rolling 12 month period

Applicable Compliance Method

Compliance with the allowable outlet concentration shall be demonstrated by the performance testing as described in condition E.1.b. Compliance with the lbs/hr emission limitation shall be demonstrated by the use of a continuous monitor as described in condition C.4. or C.6. (as approved by the Ohio EPA), and also by the performance testing as described in condition E.1.c. If required, the permittee shall demonstrate compliance by

additional mass emissions testing. Compliance with the annual emission limitation shall be determined by the record keeping required in condition C.1.

- b. Emission Limitation
0.0140 lb PE/MM Btu heat input
3.56 lbs PE/hr & 4.0 tons PE/yr

Applicable Compliance Method

0.0140 lb of PE/MM Btu heat input is the vendor specification and is considered an appropriate emission factor for this emissions unit. Compliance with the lbs/hr emission limitation shall be demonstrated by the performance testing as described in condition E.1.c. If required, the permittee shall demonstrate compliance by additional mass emissions testing. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by the actual annual hours of operation and dividing by 2000 lbs/ton.

- c. Emission Limitation
0.0057 lb SO₂/MM Btu heat input
1.45 lbs SO₂/hr & 1.6 tons SO₂/yr

Applicable Compliance Method

Compliance with the lb/MM Btu heat input emission limitation shall be demonstrated by the performance testing in condition E.1. . Compliance with the lbs/hr emission limitation shall be demonstrated by the use of a continuous monitor as described in condition C.4. (as approved by the Ohio EPA), in conjunction with the heat input emission factor , and also by the performance testing as described in condition E.1.c. If required, the permittee shall demonstrate compliance by additional mass emissions testing. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by the actual annual hours of operation and dividing by 2000 lbs/ton.

- d. Emission Limitation
2.29 lbs VOC/hr & 2.6 tons VOC/yr

Applicable Compliance Method

Compliance with the lbs/hr emission limitation shall be demonstrated by the performance testing as described in condition E.1.c. If required, the permittee shall demonstrate compliance by additional mass emissions testing . Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by the actual annual hours of operation and dividing by 2000 lbs/ton.

- e. Emission Limitation
0.1120 lb CO /MM Btu heat input
28.47 lbs CO/hr & 32.0 tons CO per rolling 12 month period

Applicable Compliance Method

Compliance with the lbs/hr and lb/MM Btu heat input emissions limitations shall be demonstrated by the performance testing in condition E.1. Compliance with the lbs/hr emission limitation shall be demonstrated by the use of a continuous monitor as described in condition C.4. (as approved by the Ohio EPA), in conjunction with the heat input emission factor, and also by the performance testing as described in condition E.1.c. If required, the permittee shall demonstrate compliance by additional mass emissions testing. Compliance with the annual emission limitation shall be determined by the record keeping required in condition C.1.

- f. Emission Limitation Startup and shutdown emissions:
2.5 tons NO_x/yr
1.0 ton CO/yr

Applicable Compliance Method

Compliance with the annual emission limitation shall be determined by the record keeping required in condition C.2.

- /yr g. Emission Limitation
0.18 lb/hr formaldehyde & 0.2 ton formaldehyde/yr

Applicable Compliance Method

Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emission factor of 0.00071 pound of formaldehyde/MM Btu heat input (AP-42 Table 3.1-3 dated 4/00) by the maximum Btu rating of 254.2 MM Btu/hr, and also by the performance testing as described in condition E.1.c.. If required, the permittee shall demonstrate compliance by additional mass emission testing. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by the actual annual hours of operation and dividing by 2000 lbs/ton.

- h. Emission Limitation
Visible particulate emissions from any stack shall not exceed 10 percent opacity as a six-minute average.

Applicable Compliance Method

Compliance with the visible emissions limitation established by this permit shall be determined by Method 9, 40 CFR Part 60 Appendix A.

F. Miscellaneous Requirements

1. Should this emissions unit be converted from a simple cycle to a combined cycle turbine in the future, a new BAT determination would be required.
2. Prior to the installation of the continuous NO_x monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting

requirements in 40 CFR Part 60, Appendix B, Performance Specification 6 for approval by the Ohio EPA, Central Office.

Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous NO_x monitoring system designed to ensure continuous valid and representative readings of NO_x emissions in units of the applicable standard. The plan shall follow the requirements specified by the Ohio EPA (typically compliance with portions of 40 CFR Part 60 Appendix F and 40 CFR Part 75 Appendix B). The quality assurance/quality control plan and a logbook dedicated to the continuous NO_x monitoring system must be kept on site and available for inspection during regular office hours.

3. In accordance with good engineering practices, the SCR unit on emissions unit P001 shall be installed, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall maintain on site a copy of the operation & maintenance manual, as provided by the manufacturer.

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

A. Applicable Emissions Limitations and/or Control Requirements

- 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>
P002 - Mitsubishi 301 natural gas fired combustion turbine with nominal generating capacity of 33.0 MW controlled with a selective catalytic reduction (SCR) system	OAC rule 3745-31-05(A)(3)	nitrogen oxides (NO _x) emissions shall not exceed 14 ppmvd at 15% Oxygen 24.37 lbs NO _x /hr 0.0140 lb particulate emissions (PE)/MM Btu heat input 6.61 lbs PE/hr & 7.4 tons PE/yr 0.0057 lb sulfur dioxide (SO ₂)/MM Btu heat input 2.69 lbs SO ₂ /hr & 3.0 tons SO ₂ /yr 52.88 lbs carbon monoxide (CO) /hr 4.25 lbs volatile organic compounds (VOC)/hr & 4.8 tons VOC/yr 0.34 lbs formaldehyde/hr & 0.3 tons formaldehyde/yr Startup and shutdown emissions: 12.6 tons NO _x /yr 4.3 ton CO/yr

	Visible particulate emissions from any stack shall not exceed 10 percent opacity as a six-minute average
OAC Rule 3745-31-05 (D) Synthetic Minor to avoid Prevention of Significant Deterioration (PSD) and Title V requirements	operational restriction, see B. 1. 27.4 tons NO _x per rolling 12 month period 59.5 tons CO per rolling 12 month period
OAC Rule 3745-17-11 (B)(4)	see A.2.a.
OAC Rule 3745-17-07	see A.2.a.
OAC rule 3745-18-06(F)	see A.2.a.
40 CFR Part 60, Subpart GG	see A.2.c.
40 CFR Part 75	see A.2.b.
OAC rule 3745-103	see A.2.b.

2. Additional Terms and Conditions

- 2.a** The emissions limit based on this applicable rule is equivalent to or less stringent than the limit established pursuant to OAC rule 3745-31-05.
- 2.b** If the permittee is subject to the requirements of 40 CFR Part 75 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.
- 2.c** The emissions limits based on this applicable rule are equivalent to or less stringent than the limits established pursuant to OAC rule 3745-31-05. Except as provided for in the terms and conditions in this permit, the permittee is not exempt from meeting any additional requirements of 40 CFR Part 60 Subpart GG.

B. Operational Restrictions

1. The maximum annual hours of operation for emissions unit P002 shall not exceed 2,250 hours*, based upon a rolling, 12-month summation.

To ensure enforceability during the first 12 calendar months following the startup of this emissions unit the permittee shall not exceed the monthly hours of operation restrictions specified in the following table:

Month	Cumulative hours of Operation
1	400
1-2	800
1-3	1200
1-4	1600
1-5	2000
1-12	2,250

After the first 12 calendar months following the startup of emissions unit P002, compliance with the annual hours of operation restriction shall be based on a rolling, 12-month summation.

* This annual restriction includes start-ups and shutdowns periods as they are described in condition B.3. The maximum annual hours of start-ups and shutdowns shall not exceed 375 hours per year.

2. The permittee shall burn only natural gas in this emissions unit. The maximum sulfur content of the natural gas shall not exceed 0.0068 percent by weight.
3. As specified in the permittee's PTI application, the maximum heat input rating of this emissions unit is 472.2 MM Btu/hr. This value corresponds to a maximum NG flow of 472,164 cf/hr with a heat content of 1000 Btu/cf. The permittee shall operate this emissions unit within the parameters specified above, except for startup and shutdown. Start-up shall be defined as the time necessary to bring the SCR unit to its minimum operating temperature (as recommended by the vendor), but under no circumstances shall it exceed 60 minutes in duration. Shutdown periods shall not exceed 30 minutes in duration.
4. With the exception of startup and shutdown, emissions unit P001 shall be operated at 100% load. The permittee may petition the Ohio EPA to operate at a greater load range if it can demonstrate to the agency's satisfaction that the emissions unit will comply with all applicable emission limits in this permit.

5. The emission limitations specified in this permit were established using the Ohio EPA's "Air Toxic Policy" and are based on both the materials used and the design parameters of the emissions unit's exhaust system, as specified in the application. The Ohio EPA's "Air Toxic Policy" was applied for each pollutant using the SCREEN 3.0 model and comparing the predicted 1-hour maximum ground-level concentration to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling:

Pollutant: Formaldehyde

TLV (ug/m3): 273 (Converted from the STEL)

Maximum Hourly Emission Rate (lbs/hr): 0.52*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 1.38

MAGLC (ug/m3): 6.49

Pollutant: Sulfuric Acid

TLV (ug/m3): 1000

Maximum Hourly Emission Rate (lbs/hr): 1.43*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 3.81

MAGLC (ug/m3): 23.8

Pollutant: Ammonia

TLV (ug/m3): 17000

Maximum Hourly Emission Rate (lbs/hr): 11.2*

Predicted 1-Hour Maximum Ground-Level Concentration (ug/m3): 29.7

MAGLC (ug/m3): 404.8

* This was modeled for emissions units P001 & P002 combined.

OAC Chapter 3745-31 requires permittees to apply for and obtain a new or modified permit to install prior to making a "modification" as defined by the OAC rule 3745-31-01. The permittee is hereby advised that the following changes to the process may be determined to be a "modification":

- a. changes in the composition of the materials used, or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value specified in the above table;
- b. changes to the emissions unit or its exhaust parameters (e.g., increased emission rate [not including an increase in an "allowable" emission limitation specified in the terms and conditions of this permit], reduced exhaust gas flow rate, and decreased stack height);
- c. changes in the composition of the materials used, or use of new materials, that would result in the emission of an air contaminant not previously permitted; and,

- d. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant that has a listed TLV.
6. The Ohio EPA will not consider any of the above-mentioned as a “modification” requiring a permit to install, if the following conditions are met:
- a. the change is not otherwise considered a “modification” under OAC Chapter 3745-31;
 - b. the permittee can continue to comply with the allowable emission limitations specified in its permit to install; and,
 - c. prior to the change, the applicant conducts an evaluation pursuant to the Air Toxic Policy, determines that the changed emissions unit still satisfies the Air Toxic Policy, and the permittee maintains documentation that identifies the change and the results of the application of the Air Toxic Policy for the change.

For any change to the emissions unit or its method of operation that either would require an increase in the emission limitation(s) established by this permit or would otherwise be considered a "modification" as defined in OAC rule 3745-31-01, the permittee shall obtain a final permit to install prior to the change.

C. Monitoring and/or Record Keeping Requirements

1. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the operating hours;
 - b. during the first 12 calendar months of operation, the permittee shall record the cumulative operating hours for each calendar month; and
 - c. beginning after the first 12 calendar months of operation, the rolling, 12-month summation of the operating hours.
 - d. in lb(s)/hr emissions rate* for NO_x and CO;
 - e. during the first 12 calendar months of operation, the cumulative NO_x and CO emissions, in tons (b x d, for each pollutant); and
 - f. beginning after the first 12 calendar months of operation, the rolling, 12-month NO_x and CO emissions, in tons (c x d, for each pollutant).

* As determined by the most recent testing data or continuous monitoring data available for each pollutant.

2. The permittee shall maintain monthly records of the following information for this emissions unit:
 - a. the number of operating hours which included startups and shutdowns;
 - b. in lb(s)/hr emissions rate* for NO_x and CO;
 - c. the NO_x and CO emissions, in tons (a x b, for each pollutant); and
 - d. the annual, year-to-date NO_x and CO emissions associated with startups and shutdowns, in tons (summation of c, for each pollutant).

* The permittee shall use 67.0 lbs NO_x /hr and 23.0 lbs CO/hr as the emission factors for the additional emissions associated with startup and shutdown periods, or as determined by testing data or continuous monitoring data that becomes available for this emissions unit.

3. For each day during which the permittee burns a fuel other than natural gas, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
4. The information management system for this emissions unit shall be capable of monitoring and recording fuel flow in cu ft or million cu ft per hour.
5. The permittee shall determine compliance with the sulfur content standard as follows: ASTM D 2880-71 shall be used to determine the sulfur content of liquid fuels and ASTM D 1072-80, D 3031-81, D 4084-82, or D 3246-81 shall be used for the sulfur content of gaseous fuels. The permittee shall determine the heat content of the fuels using ASTM method D240. The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the approval of the Ohio EPA, Central Office. The newest or most recent revisions to the applicable test method shall be used for these analyses. Alternative, equivalent methods may be used if they comply with the requirements specified in 40 CFR Part 60.13 , or upon written approval by the Ohio EPA, Central Office. The frequency of the sampling shall be such that it complies with the requirements specified in 40 CFR Part 60.334 A custom fuel monitoring schedule may be used if approved by the Ohio EPA, Northwest District Office.
6. Except for periods described in 40 CFR part 60.13, the permittee shall install, operate, and maintain equipment to continuously monitor* and record NO_x from this emissions unit in units of the applicable standard. Such continuous monitoring and recording equipment shall comply with the requirements specified by the Ohio EPA (typically compliance with portions of 40 CFR Part 60.13 and 40 CFR Part 75).

The permittee shall maintain records of all data obtained by the continuous NO_x monitoring system including, but not limited to, parts per million NO_x on an instantaneous (one-minute) basis, emissions of NO_x in units of the applicable standard (with an hourly averaging period), results of daily zero/span calibration checks, and magnitude of manual calibration adjustments.

* The installation and operation of systems to continuously monitor and record emissions of NO_x may be performed in lieu of monitoring the nitrogen content of the natural gas being fired in the turbine, as required by 40 CFR 60.334(b).

7. The permittee shall collect and record the following information for each change where the air toxic modeling was required pursuant to the Air Toxic Policy:
 - a. background data that describes the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.); and
 - b. a copy of the resulting computer model runs that show the results of the application of the Air Toxic Policy for the change.

D. Reporting Requirements

1. The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than natural gas was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
2. The permittee shall submit deviation (excursion) reports which identify all exceedances of the rolling, 12-month operating hours limitation and, for the first 12 calendar months of operation, all exceedances of the maximum allowable cumulative operating hours levels. These reports are due by the date described in Part 1 - General Terms and Conditions of this permit under section (A)(2).
3. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031 and 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 appropriate Ohio EPA District Office or local air agency documenting the date, commencement and completion times, duration, magnitude, reason (i.e., startup and shutdown periods as defined in Condition B.3. above, malfunctions, etc.), and corrective actions taken (if any), of all instances of NO_x values in excess of the applicable limits specified in the terms and conditions of this permit. These reports shall also contain the total NO_x emissions for the calendar quarter (in tons).

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

4. Pursuant to OAC rules 3745-15-04, 3745-35-02, and ORC sections 3704.03(I) and 3704.031, the permittee shall submit a summary of the excess emission report pursuant to 40 CFR Part 60.7. The

summary shall be submitted to the appropriate Ohio EPA District Office or local air agency within 30 days following the end of each calendar quarter in a manner prescribed by the Director.

5. The permittee shall submit deviation (excursion) reports that identify any record which shows that the sulfur content of the natural gas exceeded 0.0068 percent by weight. These reports are due by the date described in Part I - General Terms and Conditions of this permit under section (A)(2).
6. The permittee shall submit deviation (excursion) reports that identify each time when this emissions unit was not in compliance with the requirements of condition B.3. above. These reports are due by the date described in Part I - General Terms and Conditions of this permit under section (A)(2).
7. In lieu of the excess emissions reports required under 40 CFR Part 60.334, the permittee shall submit excess and emissions reports for emissions unit P002 in accordance with this permit.
8. Pursuant to 40 CFR Part 60.7, the permittee is hereby advised of the requirement to report the following at the appropriate times:
 - a. construction date (no later than 30 days after such date);
 - b. anticipated start-up date (not more than 60 days or less than 30 days prior to such date);
 - c. actual start-up date (within 15 days after such date); and
 - d. date of performance testing (if required, at least 30 days prior to testing).

Reports are to be sent to:

Ohio Environmental Protection Agency
DAPC - Permit Management Unit
P. O. Box 163669
Columbus, Ohio 43216-3669

and

Ohio Environmental Protection Agency
Northwest District Office
Division of Air Pollution Control
347 North Dunbridge Road
Bowling Green, Ohio 43402

This emissions unit is subject to the applicable provisions of Subpart GG of the New Source Performance Standards (NSPS) as promulgated by the United States Environmental Protection Agency, 40 CFR Part 60.

The application and enforcement of these standards are delegated to the Ohio EPA. The requirements of 40 CFR Part 60 are also federally enforceable."

E. Testing Requirements/Compliance Methods Determinations

1. The permittee shall conduct, or have conducted, emission testing for this emissions unit in accordance with the following requirements:
 - a. The emission testing shall be conducted within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit.
 - b. The emission testing shall be conducted to demonstrate compliance with the NO_x outlet concentration, the lbs/MM Btu limitations for CO and SO₂**.
 - c. The emission testing shall also be conducted to demonstrate compliance with the mass emissions limitations for NO_x, SO₂, CO, Formaldehyde, VOC, and PE. Mass rate emissions testing shall be conducted on one of six emissions units included in PTI #s 03-13390, 03-13389, and 03-13377. Emissions testing shall be conducted under "worst case" conditions on the "worst case" emissions unit. As part of the stack test submittal or in other documentation, the permittee shall provide information outlining how the proposed mass rate emission testing represents "worst case" conditions on the "worst case" emissions unit.
 - d. The following test method(s) shall be employed to demonstrate compliance with the above emissions limitations: for NO_x, Method 20 of 40 CFR Part 60, Appendix A; for PE, Method 5 of 40 CFR Part 60, Appendix A; for Formaldehyde, SW-846 Method 0011, Appendix A; for VOC Method 25 of 40 CFR Part 60, Appendix A; for SO₂, Method 20 of 40 CFR Part 60, Appendix A; and for CO, Method 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA approved test methods may be used with prior approval from the Ohio EPA.
 - e. The testing shall be performed at peak load (as defined by 40 CFR part 60.331), unless otherwise specified or approved by the appropriate Ohio EPA District Office or local air agency.
 - f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the Ohio EPA, Northwest District Office. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the emissions unit operating parameters, the time(s) and date(s) of the test(s), and the person(s) who will be conducting the test(s). Failure to submit such notification for review and approval prior to the test(s) may result in the Ohio EPA, Northwest District Office refusal to accept the results of the emission test(s).
 - g. Personnel from the Ohio EPA, Northwest District Office shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid

characterization of the emissions from the emissions unit and/or the performance of the control equipment.

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

* In lieu of the test methods and procedures required under 40 CFR Part 60.335, the permittee shall follow the testing requirements in accordance with this permit.

**In lieu of the initial SO₂ emissions testing required above, the permittee may sample the Sulfur content of the fuel as provided for in 40 CFR Subpart GG.

- 2. Within 60 days after achieving the maximum production rate at which the emissions unit will be operated, but not later than 180 days after initial startup of such emissions unit, the permittee shall conduct certification tests of the continuous NO_x monitoring system pursuant to ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6* . Personnel from the appropriate Ohio EPA District Office or local air agency shall be notified 30 days prior to initiation of the applicable tests and shall be permitted to examine equipment and witness the certification tests. In accordance with OAC rule 3745-15-04, all copies of the test results shall be submitted to the appropriate Ohio EPA District Office or local air agency within 30 days after the test is completed. Copies of the test results shall be sent to the appropriate Ohio EPA District Office or local air agency and the Ohio EPA, Central Office. Certification of the continuous NO_x monitoring system shall be granted upon determination by the Ohio EPA, Central Office that the system meets all requirements of ORC section 3704.03(I) and 40 CFR Part 60, Appendix B, Performance Specification 6* .

*If approved by the Ohio EPA Central Office, the permittee may use 40 CFR Part 60, Appendix B, Performance Specification 2 in conjunction with a fuel flow monitor as described in 40 CFR Part 75 to meet this requirement.

- 3. Compliance with the allowable emission limitations in this permit shall be determined according to the following methods:

- a. Emission Limitation
NO_x emissions shall not exceed 14 ppmvd at 15% Oxygen

24.37 lbs NO_x/hr & 27.4 tons NO_x per rolling 12 month period

Applicable Compliance Method

Compliance with the allowable outlet concentration shall be demonstrated by the performance testing as described in condition E.1.b. Compliance with the lbs/hr emission limitation shall be demonstrated by the use of a continuous monitor as described in condition

C.4. or C.6. (as approved by the Ohio EPA), and also by the performance testing as described in condition E.1.c. If required, the permittee shall demonstrate compliance by additional mass emissions testing. Compliance with the annual emission limitation shall be determined by the record keeping required in condition C.1.

- b. Emission Limitation
0.0140 lb PE/MM Btu heat input
6.61 lbs PE/hr & 7.4 tons PE/yr

Applicable Compliance Method

0.0140 lb of PE/MM Btu heat input is the vendor specification and is considered an appropriate emission factor for this emissions unit. Compliance with the lbs/hr emission limitation shall be demonstrated by the performance testing as described in condition E.1.c. If required, the permittee shall demonstrate compliance by additional mass emission testings. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by the actual annual hours of operation and dividing by 2000 lbs/ton.

- c. Emission Limitation
0.0057 lb SO₂/MM Btu heat input
2.69 lbs SO₂/hr & 3.0 tons SO₂/yr

Applicable Compliance Method

Compliance with the lb/MM Btu heat input emission limitation shall be demonstrated by the performance testing in condition E.1. . Compliance with the lbs/hr emission limitation shall be demonstrated by the use of a continuous monitor as described in condition C.4. (as approved by the Ohio EPA), in conjunction with the heat input emission factor , and also by the performance testing as described in condition E.1.c. If required, the permittee shall demonstrate compliance by additional mass emissions testing. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by the actual annual hours of operation and dividing by 2000 lbs/ton.

- d. Emission Limitation
4.25 lbs VOC/hr & 4.8 tons VOC/yr

Applicable Compliance Method

Compliance with the lbs/hr emission limitation shall be demonstrated by the performance testing as described in condition E.1.c. If required, the permittee shall demonstrate compliance by additional mass emissions testing . Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by the actual annual hours of operation and dividing by 2000 lbs/ton.

- e. Emission Limitation
0.1120 lb CO /MM Btu heat input
52.88 lbs CO/hr & 59.5 tons CO per rolling 12 month period

Applicable Compliance Method

Compliance with the lbs/hr and lb/MM Btu heat input emissions limitations shall be demonstrated by the performance testing in condition E.1. Compliance with the lbs/hr emission limitation shall be demonstrated by the use of a continuous monitor as described in condition C.4. (as approved by the Ohio EPA), in conjunction with the heat input emission factor , and also by the performance testing as described in condition E.1.c. If required, the permittee shall demonstrate compliance by additional mass emissions testing. Compliance with the annual emission limitation shall be determined by the record keeping required in condition C.1.

f. Emission Limitation

Startup and shutdown emissions:

12.6 tons NO_x/yr

4.3 ton CO/yr

Applicable Compliance Method

Compliance with the annual emission limitations shall be determined by the record keeping required in condition C.2.

g. Emission Limitation

0.34 lb/hr formaldehyde & 0.3 tons formaldehyde/yr

Applicable Compliance Method

Compliance with the lb/hr emission limitation shall be demonstrated by multiplying the emission factor of 0.00071 pound of formaldehyde/MM Btu heat input (AP-42 Table 3.1-3 dated 4/00) by the maximum Btu rating of 472.2 MM Btu/hr, and also by the performance testing as described in condition E.1.c. If required, the permittee shall demonstrate compliance by additional mass emission testing. Compliance with the annual emission limitation shall be determined by multiplying the hourly emission rate by the actual annual hours of operation and dividing by 2000 lbs/ton.

h. Emission Limitation

Visible particulate emissions from any stack shall not exceed 10 percent opacity as a six-minute average.

Applicable Compliance Method

Compliance with the visible emissions limitation established by this permit shall be determined by Method 9, 40 CFR Part 60 Appendix A.

F. Miscellaneous Requirements

1. Should this emissions unit be converted from a simple cycle to a combined cycle turbine in the future, a new BAT determination would be required.

2. Prior to the installation of the continuous NO_x monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 6 for approval by the Ohio EPA, Central Office.

Within 180 days of the effective date of this permit, the permittee shall develop a written quality assurance/quality control plan for the continuous NO_x monitoring system designed to ensure continuous valid and representative readings of NO_x emissions in units of the applicable standard. The plan shall follow the requirements specified by the Ohio EPA (typically compliance with portions of 40 CFR Part 60 Appendix F and 40 CFR Part 75 Appendix B). The quality assurance/quality control plan and a logbook dedicated to the continuous NO_x monitoring system must be kept on site and available for inspection during regular office hours.

3. In accordance with good engineering practices, the SCR unit on emissions unit P002 shall be installed, operated and maintained in accordance with the manufacturer's recommendations, with any modifications deemed necessary by the permittee. The permittee shall maintain on site a copy of the operation & maintenance manual, as provided by the manufacturer.