



10/15/2026

Mr. Seongju (SJ) Park
Trumbull Energy Center
910 Sheraton Drive
Mars, PA 16046

Facility ID: 0278112011
Permit Number: P0140836
County: Trumbull

RE: DRAFT AIR POLLUTION TITLE V PERMIT

Permit Type: Initial

Dear Permit Holder:

A draft of the OAC Chapter 3745-77 Title V permit for the referenced facility has been issued. The purpose of this draft is to solicit public comments. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and Public Notices website, [Weekly Review and Public Notices](#). A copy of the public notice, the Statement of Basis, and the draft permit are enclosed. This permit can be accessed electronically on the Ohio EPA document search website here: [eDocument Search](#). The permit can also be commented on and accessed electronically at: <https://ohioepa.commentinput.com>. Search by entering the permit # (P0140836) in the "Search Projects" search box and selecting "Review Document" or "Draft Permit." Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Written (paper) comments must be sent to the following:

Andrea Moore
Permit Review/Development Section
Ohio EPA, DAPC
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

and

Ohio EPA DAPC, Northeast District Office
8957 Canyon Falls Blvd.
Twinsburg, OH 44087

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published on the Ohio EPA Weekly Review and Public Notices website, [Weekly Review and Public Notices | Ohio Environmental Protection Agency](#). You will be notified if a public hearing is scheduled. A decision on processing the Title V permit will be made after consideration of comments received and oral testimony if a public hearing is conducted. You will then be provided with a Preliminary Proposed Title V permit and another opportunity to comment prior to the 45-day Proposed Title V permit submittal to U.S. EPA Region 5. The permit will be issued final after U.S. EPA review is completed and no objections to the final issuance have been received. If you have any questions, please contact Ohio EPA DAPC, Northeast District Office at (330)963-1200.

Sincerely,

Robert Hodanbosi
Chief, Division of Air Pollution Control

cc: U.S. EPA Region 5 - *Via E-Mail Notification*
Ohio EPA-NEDO; Pennsylvania; West Virginia

Public Notice

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: [Weekly Review and Public Notices | Ohio Environmental Protection Agency](#) or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Phone: 614-644-3037 Email: HClerk@epa.ohio.gov

Draft Title V Permit Initial

Trumbull Energy Center
Henn Parkway
Lordstown, OH 44481

ID#: P0140836
Date of Action: 10/15/2026
Permit Desc: Initial Title V permit for a 940 MW combined cycle gas turbine (CCGT) power plant.

The permit and complete instructions for requesting information or submitting comments may be obtained at: <https://ohioepa.commentinput.com> - Search by entering the permit P0140836 in the "Search Projects" search box.



Statement of Basis* For Air Pollution Title V Permit

*As defined in OAC rule 3745-77-01(MM): “Statement of basis” or “SOB” means a statement that sets forth the legal and factual basis for the draft [Title V] permit conditions (including references to the applicable statutory or regulatory provisions).”

Completing this form is intended to satisfy those requirements.

Facility ID:	0278112011
Facility Name:	Trumbull Energy Center
Facility Description:	940 MW combined cycle gas turbine (CCGT) facility
Facility Address:	Henn Parkway Lordstown, OH 44481
Permit #:	P0140836

This facility is subject to Title V because it is major for:

☐ Lead ☐ Sulfur Dioxide ☒ Carbon Monoxide ☒ Volatile Organic Compounds ☒ Nitrogen Oxides

☒ Particulate Matter $\leq$ 10 microns ☐ Single Hazardous Air Pollutant ☐ Combined Hazardous Air Pollutants ☐ GHG

And/or subject to:

☒ Maximum Available Control Technology Standard(s) ☐ GACT standard(s) that requires a Title V permit ☒ Title IV ☐ Opt-In source

A. Permit Background

1. Has each insignificant emissions unit been reviewed to confirm it meets the definition in OAC rule 3745-77-01(V)?

Yes	No	Comments: N/A
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2. Discuss any **common control determinations** (this includes revisions to previous determinations), include justification, factors, and facts which led to the final decision.

Discussion: **N/A**

3. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from **a renewal** per OAC rule 3745-77-08(E). This includes identifying conditions from previous permits that are not included in the new permit.



PTI No.: N/A	Affected EUs: N/A
Discussion of changes from the previous Title V: N/A	
4. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document resulting from a minor modification per OAC rules 3745-77-08(C)(1) or (2)	
PTI No.: N/A	Affected EUs: N/A
Minor Modification Description: N/A	
5. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a significant permit modification per OAC rule 3745-77-08(C)(3)	
PTI No.: N/A	Affected EUs: N/A
Significant Modification Description: N/A	
6. Please identify the affected unit(s) and associated PTI, if applicable, along with a brief description of any changes to the permit document that qualify as a reopening per OAC rule 3745-77-08(D)	
PTI No.: N/A	Affected EUs: N/A



Reopening for Cause for Description: **N/A**

7. Please identify the affected emissions unit(s) and pollutant(s) for which a **Compliance Assurance Monitoring (CAM)** Plan is required per 40 CFR 64. Provide more emissions unit specific detail in Section C.

Affected EUs: **None**

8. Please identify any federal **Consent Decree (CD)** that resulted in the addition of Title V T&Cs – include the CD Number, the CD Public Notice date (if known) and Ohio EPA Permit Number (if applicable, along with final permit issuance date) that incorporates the CD requirements.

CD No. **N/A**

Public
Notice
Date: **N/A**

PTI No. **N/A**

PTI Issuance Date: **N/A**

9. Please identify any **complex or unusual rule applicability determination** that is not readily apparent in the permit T&Cs and warrants additional explanation in the Statement of Basis. If the discussion is included in a PTI Permit Strategy Write Up cite the Permit Number and copy/paste or summarize the determination here.

PTI No. **N/A**

Discussion: **N/A**

10. Please identify any **streamlining determinations** within the permit. Include an identification of the subsumed limit(s) and an explanation of how the resulting limit is equivalent to or more stringent than those subsumed. If the discussion exists in a PTI Permit Strategy Write Up, cite the Permit Number and summarize the determination here. This would also be noted for specific emissions units identified in C.



PTI No. **N/A**

Discussion: **N/A**

11. Please identify any current **enforcement actions** to address violations at the facility resulting in a compliance plan and schedule.

Director's Final
Findings and Orders;
AGO Consent Decree;
or U.S. EPA Consent
Decree Date:

List the Order/Injunctive Relief number from the associated enforcement document and provide a description: **N/A**

B. Facility-Wide Terms and Conditions

Term and Condition (paragraph)	Basis		Comments
	SIP (3745-)	Other	
B.2.		40 CFR 52.21.	Applicability of PSD regulations as promulgated by U.S. EPA 40 CFR 52.21.
B.3.		40 CFR Part 97, Subparts AAAAA – DDDDD	Applicability of Transportation Rule (TR) Trading Program Requirements - Cross-State Air Pollution Rule (CSAPR) - P001 & P002

B.4.	109		Ensure that any EU(s) subject to CSAPR complies/comply with the requirements of the OAC Chapter 3745-109, which includes submitting timely permit applications.
B.5.		40 CFR Part 60, Subparts A and Dc	NSPS Subpart A - General Provisions applicable to EU B001 NSPS Subpart Dc - Small Industrial Steam Generating Units applicable to EU B001
B.6.		40 CFR Part 60, Subparts A, KKKK and TTTT	40 CFR Part 60, Subparts A – General Provisions applicable to EUs P001 & P002 40 CFR Part 60, Subparts KKKK - Standards of Performance for Stationary Combustion Turbines applicable to P001 & P002 40 CFR Part 60, Subparts TTTT - Standards of Performance for Greenhouse Gas Emissions for Electric Generating Units applicable to P001 and P002
B.7.		40 CFR Part 60, Subparts A and IIII	40 CFR Part 60, Subpart A – NSPS General Provisions applicable to EUs P003 & P004 40 CFR Part 60, Subpart IIII
B.8.	103		Acid Rain Permits and Compliance
B.9.		40 CFR Part 61, Subpart M	NESHAP for asbestos – Facility-wide applicability of asbestos renovation and demolition activities conducted at this facility shall be performed in accordance with the applicable requirements
B.10.		40 CFR Part 63, Subparts A and ZZZZ	40 CFR Part 63, Subpart A 40 CFR Part 63, Subpart ZZZZ



B. 11.	3745-31	40 CFR Part 60, Subpart III 40 CFR Part 63, Subpart ZZZZ	Insignificant EU listing
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C. Emissions Unit Terms and Conditions

Key: EU = emissions unit ID ND = negative declaration (i.e., term that indicates that a particular rule(s) is (are) not applicable to a specific emissions unit) OR = operational restriction M = monitoring requirements ENF = did noncompliance issues drive the monitoring requirements?	R = record keeping requirements Rp = reporting requirements ET = emission testing requirements (not including compliance method terms) Misc = miscellaneous requirements
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Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
Section C.1: Auxiliary Boiler 37.8 MMBtu/hr											
B001	See Comments	OAC rule 3745-31-05(A)(3)(a)(ii)	Y	N	N	N	N	N	N	N	ND - OAC rule 3745-31-05(A)(3) requirements do not apply to PM _{2.5} , PM ₁₀ , NO _x , CO, SO ₂ , or VOC emissions because PTE for each is less than 10 TPY.
B001	CO: 0.055 lb/mmBtu of heat input; 2.08 lbs/hr; and 2.08 tons per rolling, 12-month period. NO _x : 0.020 lb/mmBtu of heat input, 0.76 lb/hr and 0.76 ton per rolling, 12-	OAC rule 3745-31-10 through 20	N	Y	N	Y	Y	Y	N	N	OR - burn only natural NG in this EU M - perform monthly VE checks (stack) for visible PE when EU is in operation and weather conditions allow R - maintain daily records of the type and quantity when fuel other than NG is burned; maintain monthly records of operating hours and rolling, 12-month summation of operating hours; note presence or absence of any VE in an operations log; maintain VE log on site. Rp - submit deviation report within 30 days of burning a fuel other than NG; submit quarterly deviation reports identifying all exceedances of the rolling, 12-month operating hours limitation ET - conduct CO & NO _x emission testing at discretion of OEPA per Engineering Guide #16; conduct PM ₁₀ /PM _{2.5} ; VOC; H ₂ SO ₄ ; and CO _{2e} emission testing and Method 9 if required



Draft Title V Permit
Trumbull Energy Center
Permit Number: P0140836
Facility ID: 0278112011
Statement of Basis

Emissions Unit Table

[illegible]



Draft Title V Permit
Trumbull Energy Center
Permit Number: P0140836
Facility ID: 0278112011
Statement of Basis

Emissions Unit Table

[illegible]



Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	not exceed 10% opacity as a 6-minute average.										
B001	See Comments	OAC rule 3745-31-05(F)	N	N	N	Y	Y	N	N	N	The maximum annual operating hours shall not exceed 2,000 hours per rolling, 12-month period. R - maintain monthly records of operating hours and rolling, 12-month summation of operating hours Rp - submit quarterly deviation (excursion) reports identifying all exceedances of the rolling, 12-month limitation on operating hours and for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation.
B001	See Comments	OAC rule 3745-17-07(A)	Y	N	N	N	N	N	N	N	ND - emission limit less stringent than OAC rules 3745-31-10 through 20.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
B001	See Comments	OAC rule 3745-17-10(B)(1)	Y	N	N	N	N	N	N	N	ND - emission limit less stringent than OAC rules 3745-31-10 through 20.
B001	See Comments	OAC rule 3745-110-03(K)(20)	Y	N	N	N	N	N	N	N	ND – EU is exempt from the requirements of OAC rule 3745-110-03(A) through (G) since this permit restricts NOx emissions to less than 25 TPY.
B001	See Comments	40 CFR Part 60, Subpart A	N	N	N	N	N	N	N	N	40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to emissions EUs affected by 40 CFR Part 60.
B001	See Comments	40 CFR Part 60, Subpart Dc	Y	N	N	Y	Y	N	N	N	ND - rule does not establish emission limits for NG-fired boilers EU is subject to the applicable provisions of NSPS Subpart Dc as promulgated by US EPA, 40 CFR Part 60. Application and enforcement of these standards are delegated to OEPA, and are federally enforceable. R - comply with record keeping for NG usage per 40 CFR 60.48c(g)(2) - Maintain records of the amount of each fuel combusted during each calendar month; maintain records for two years following the date of such record

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
											Rp - comply with reporting requirements according to subpart including notification of date of construction or reconstruction and actual startup
B001	See Comments	40 CFR Part 63, Subpart JJJJJJ	Y	N	N	N	N	N	N	N	ND – EU is exempt per 40 CFR 63.11195(e) due to combusting only NG.
B001	See Comments	40 CFR Part 63, Subpart A	Y	N	N	N	N	N	N	N	ND - exempt per 40 CFR 63.11195(e) due to combusting only NG Table 8 to Subpart JJJJJJ of 40 CFR Part 63 – Applicability of General Provisions to Subpart JJJJJJ shows which parts of the General Provisions in 40 CFR 63.1 - 63.16 apply.
Section C.2: P005, Wet Cooling Tower											
P005	See Comments	OAC rule 3745-31-05(A)(3)(a)(ii)	Y	N	N	N	N	N	N	N	ND - requirements of OAC rule 3745-31-05(A)(3) do not apply to PM _{2.5} or PM ₁₀ emissions since the PTE for each pollutant is less than 10 TPY.
P005	PM ₁₀ : 1.36 lbs/hr and 5.95	OAC rules 3745-31-10 through 20	N	Y	Y	Y	Y	Y	N	Y	OR - maintain TDS concentration of the cooling water less than or equal to 3,500 milligrams per liter (mg/l).



Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	tons per rolling, 12-month period. PM _{2.5} : 0.54 lb/hr and 2.38 tons per rolling, 12-month period. Install drift eliminator with maximum drift rate of 0.0005%. Visible PE shall not exceed 10% opacity as a										M - install, operate, and maintain conductivity meter or other equipment to continuously monitor cooling water TDS concentration R - continuously record cooling water TDS concentration Rp - submit quarterly deviation reports identifying all hourly TDS readings in excess of 3,500 mg/l; identify corrective action taken to reduce the TDS concentration ET - If required, demonstrate TDS concentration compliance according to 40 CFR Part 136; and Method 9 for VE Misc - The presence of condensed water vapor shall not be deemed a violation for failure of stack emissions meeting this VE limitation.

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	6-minute average.										
P005		OAC rule 3745-17-07(A)(1)	Y	N	N	N	N	N	N	N	ND - emission limit less stringent than OAC rules 3745-31-10 through 20.
P005		OAC rule 3745-17-11(B)	Y	N	N	N	N	N	N	N	ND - emission limit less stringent than OAC rules 3745-31-10 through 20.
Section C.3: Emissions Unit Group – Combined Cycle Turbines: P001 and P002											
P001 & P002	See Comments	OAC rule 3745-31-05(A)(3) and ORC 3704.03(T)	N	N	N	N	N	N	N	N	All requirements specified in this Section of the permit for EU Group P001 and P002 apply to each combined cycle combustion turbine (P001 and P002) unless a combined requirement is otherwise specified. Compliance with the requirements of this rule for CO, SO₂, NO_x, PM₁₀, PM_{2.5} and VOC includes compliance with the requirements of OAC rules 3745-31-10 through 20.



Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
P001 & P002	Visible PE (stack) shall not exceed 10% opacity as a 6-minute average. CO ₂ e: 833 lb/MW-hr gross energy output (at full load ISO conditions without duct firing); 884 lbs/MW-hr gross energy output (maximum under any full load	OAC rules 3745-31-10 through 20	N	Y	Y	Y	Y	N	N	N	 OR - burn only pipeline quality NG in this EU M – conduct monthly VE observations when EU is in operation and weather conditions allow R – maintain daily records of type and quantity when fuel other than NG is burned; document any observed VE incidents in operations log; maintain monthly records of emissions rates and all startup & shutdown periods; calculate and record monthly CO ₂ emissions using continuous fuel flow monitor data according to 40 CFR Part 75, Appendix G; calculate CO ₂ emissions per rolling, 12-month period Rp - submit deviation report within 30 days of burning fuel other than NG ET – emission rate based on calculated PTE



Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	condition with duct firing); and 401,084 lb/hr (maximum under any condition with duct firing).										
P001 & P002	See Comments	OAC rules 3745-31-10 through 20	N	Y	N	Y	Y	Y	Y	N	PM ₁₀ /PM _{2.5} emission limits include both filterable and condensable PE. OR - burn only pipeline quality NG in this EU R – maintain daily records of type and quantity when fuel other than NG is burned Rp - submit deviation report within 30 days of burning fuel other than NG ET –conduct emission testing for PM ₁₀ /PM _{2.5} at discretion of OEPA pursuant to EG #16



Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
P001 & P002	See Comments	OAC rules 3745-31-10 through 20	N	Y	N	N	N	N	N	N	Utilize SCR and catalytic oxidation units at all times during EU operation. OR - burn only pipeline quality NG in this EU R – maintain daily records of type and quantity when fuel other than NG is burned; continuously record NOx emissions with certified CEMS M – continuously monitor NOx & CO emissions with certified CEMS Rp - submit deviation report within 30 days of burning fuel other than NG; submit quarterly NOx & CO CEMS reports ET – conduct testing for NOx every 5 years per EG #16; conduct emission testing for PM ₁₀ /PM _{2.5} , CO, SO ₂ , VOC, and H ₂ SO ₄ at the discretion of OEPA pursuant to EG #16
P001 & P002	The sulfur content of NG burned in this EU shall not exceed 0.5 grain per 100	OAC rules 3745-31-10 through 20	N	Y	Y	Y	Y	Y	N	N	OR - burn only pipeline quality NG in this EU M – sample and analyze NG monthly to determine sulfur content using appropriate standards; fuel supplier data may be used to comply as appropriate; in lieu of monthly sampling if fuel is demonstrated not to exceed potential sulfur emissions of 1.5E-03 lb SO ₂ /mmBtu, comply with one of the following: fuel quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for fuel, specifying that the maximum total sulfur content for natural gas is 0.5 grains of sulfur or less per 100 standard cubic feet, has potential sulfur emissions of less than 1.5E-03 lb SO ₂ /mmBtu heat input; obtain



Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	standard cubic feet.										representative fuel sampling data showing sulfur content of the fuel does not exceed 1.5E-03 lb SO₂/mmBtu heat input. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of appendix D to part 75 of this chapter is required; or one of the custom sulfur monitoring schedules outlined in 40 CFR 60.4370(c) may be used to comply with the 1.5E-03 lb SO₂/mmBtu standard. R – maintain daily records of type and quantity when fuel other than NG is burned Rp - submit deviation report within 30 days of burning fuel other than NG; submit quarterly reports of any monthly record showing an exceedance of allowable NG sulfur content of 0.5 gr/100 scf ET – demonstrate compliance through M&R per 40 CFR 60.4365 or 40 CFR 60.4370; If required, demonstrate compliance per 40 CFR 60.4415(a)(1).
P001 & P002	With duct burner: CO: 2.0 ppmvd & 15.5 lbs/hr	OAC rules 3745-31-10 through 20	N	Y	Y	Y	Y	Y	N	N	OR - burn only pipeline quality NG in this EU M – continuously monitor NO_x & CO emissions with certified CEMS R – maintain daily records of type and quantity when fuel other than NG is burned; maintain records demonstrating compliance with fuel sulfur content; maintain monthly records of emissions rates and all startup & shutdown periods; continuously record NO_x & CO emissions with certified CEMS



Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	NOx: 2.0 ppmvd & 25.3 lbs/hr SO ₂ : 1.5E-03 lbs/mmBtu & 5.1 lbs/hr PM ₁₀ /PM _{2.5} : 4.6E-03 lbs/mmBtu & 15.2 lbs/hr VOC: 2.0 ppmvd & 8.8 lbs/hr H ₂ SO ₄ : 1.1E- 03 lb/mmBtu & 3.7 lbs /hr										Rp - submit deviation report within 30 days of burning fuel other than NG; submit quarterly NOx & CO CEMS reports ET – conduct testing for NOx every 5 years per EG #16; conduct emission testing for PM ₁₀ /PM _{2.5} , CO, SO ₂ , VOC, and H ₂ SO ₄ at the discretion of OEPA pursuant to EG #16
P001 & P002	Without duct burner:	OAC rules 3745-31-10 through 20	N	Y	Y	Y	Y	Y	N	N	OR - burn only pipeline quality NG in this EU M – continuously monitor NOx & CO emissions with certified CEMS



Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	CO: 2.0 ppmvd & 14.6 lbs/hr NOx: 2.0 ppmvd & 23.8 lbs/hr SO ₂ : 1.5E-03 lbs/mmBtu & 4.8 lbs/hr PM ₁₀ /PM _{2.5} : 6.0E-03 lbs/mmBtu & 12.9 lbs/hr VOC: n1.0 ppmvd & 4.1 lbs/hr H ₂ SO ₄ : 1.1E- 03 lb/mmBtu & 3.5 lbs /hr										R – maintain daily records of type and quantity when fuel other than NG is burned; maintain records demonstrating compliance with fuel sulfur content; maintain monthly records of emissions rates and all startup & shutdown periods; continuously record NOx & CO emissions with certified CEMS Rp - submit deviation report within 30 days of burning fuel other than NG; submit quarterly NOx & CO CEMS reports ET – conduct testing for NOx every 5 years per EG #16; conduct emission testing for PM₁₀/PM_{2.5}, CO, SO₂, VOC, and H₂SO₄ at the discretion of OEPA pursuant to EG #16



Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
P001 & P002	Pollutant limitations per rolling, 12-month period: 135.2 tons CO 117.6 tons NOx 21.0 tons SO ₂ 64.4 tons PM ₁₀ /PM _{2.5} 50.3 tons VOC 15.8 tons H ₂ SO ₄	OAC rules 3745-31-10 through 20	N	Y	Y	Y	Y	Y	N	N	OR - burn only pipeline quality NG in this EU M – continuously monitor NOx & CO emissions with certified CEMS R – maintain daily records of type and quantity when fuel other than NG is burned; maintain records demonstrating compliance with fuel sulfur content; maintain monthly records of emissions rates and all startup & shutdown periods; continuously record NOx & CO emissions with certified CEMS; calculate and record monthly CO ₂ emissions using data from continuous fuel flow monitor per 40 CFR Part 75, Appendix G Rp - submit deviation report within 30 days of burning fuel other than NG; submit quarterly NOx & CO CEMS reports ET – conduct testing for NOx every 5 years per EG #16; conduct emission testing for PM ₁₀ /PM _{2.5} , CO, SO ₂ , VOC, and H ₂ SO ₄ at the discretion of OEPA pursuant to EG #16; compliance with rolling tonnages based on testing results



Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	1,683,213 tons CO ₂ e										
P001 & P002	Emissions Limitations During Startup Cold Startup: 526.0 lbs CO/hr 162.0 lbs NOx/hr 64.4 lbs VOC/hr Hot Startup: 436.0 lbs CO/hr	OAC rules 3745-31-10 through 20	N	Y	Y	Y	Y	Y	N	N	OR - burn only pipeline quality NG in this EU M – continuously monitor NOx & CO emissions with certified CEMS R – maintain daily records of type and quantity when fuel other than NG is burned; maintain records demonstrating compliance with fuel sulfur content; maintain monthly records of emissions rates and all startup & shutdown periods; continuously record NOx & CO emissions with certified CEMS Rp - submit deviation report within 30 days of burning fuel other than NG; submit quarterly NOx & CO CEMS reports ET – conduct testing for NOx every 5 years per EG #16; conduct emission testing for PM ₁₀ /PM _{2.5} , CO, SO ₂ , VOC, and H ₂ SO ₄ at the discretion of OEPA pursuant to EG #16



Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	78.7 lbs NOx/hr 60.1 lbs VOC/hr Warm Startup: 496.0 lbs CO/hr 113.0 lbs NOx/hr 59.6 lbs VOC/hr										
P001 & P002	Emissions Limitations During Shutdown 159.0 lbs CO/hr	OAC rules 3745-31-10 through 20	N	Y	Y	Y	Y	Y	N	N	OR - burn only pipeline quality NG in this EU M – continuously monitor NOx & CO emissions with certified CEMS R – maintain daily records of type and quantity when fuel other than NG is burned; maintain records demonstrating compliance with fuel sulfur content; maintain monthly records of emissions rates and all startup &



Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
	72.7 lbs NOx/hr 67.9 lbs VOC/hr										shutdown periods; continuously record NOx & CO emissions with certified CEMS Rp - submit deviation report within 30 days of burning fuel other than NG; submit quarterly NOx & CO CEMS reports ET – conduct testing for NOx every 5 years per EG #16; conduct emission testing for PM ₁₀ /PM _{2.5} , CO, SO ₂ , VOC, and H ₂ SO ₄ at the discretion of OEPA pursuant to EG #16
P001 & P002	See Comments	OAC rules 3745-31-10 through 20	N	N	N	N	N	N	N	N	Each continuous NOx monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2. At least 45 days before commencing certification testing of the continuous NOx monitoring system(s), develop and maintain a written QA/QC plan designed to ensure continuous valid and representative readings of NOx emissions from the continuous monitor(s), in units of the applicable standard(s)
P001 & P002	See Comments	OAC rules 3745-31-10 through 20	N	N	N	N	N	N	N	N	Each continuous CO monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specifications 4 or 4a. At least 45 days before commencing certification testing of the continuous CO monitoring system(s), develop and maintain a written QA/QC plan designed to ensure continuous valid and representative



Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
											readings of CO emissions from the continuous monitor(s), in units of the applicable standard(s).
P001 & P002	See Comments	OAC rules 3745-31-10 through 20	N	N	N	N	N	N	N	N	The CEMS consists of all equipment used to acquire data to provide a record of emissions and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data recording/processing hardware and software.
P001 & P002	See Comments	OAC rule 3745-17-07(A)	Y	N	N	N	N	N	N	N	ND - Emission limit less stringent than OAC rule 3745-31-10 through 20.
P001 & P002	See Comments	OAC rule 3745-17-11(B)(4)	Y	N	N	N	N	N	N	N	ND - Emission limit less stringent than OAC rule 3745-31-10 through 20.
P001 & P002	See Comments	OAC rule 3745-18-06(A)	Y	N	N	N	N	N	N	N	EU is exempt from the requirements of this rule, since only NG is burned.
P001 & P002	See Comments	OAC rule 3745-110-03(K)(20)	Y	N	N	N	N	N	N	N	Exemption from NOx RACT requirements

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
P001 & P002	See d)(12), d)(13), d)(14), d)(15) and e)(8).	OAC rule 3745-114-01	N	N	Y	Y	Y	N	N	N	M – H₂SO₄, emissions calculated to be less than 80% of the MAGLC; Prior to making any physical changes to or changes in the method of operation evaluate any new raw material or processing agent for each toxic air contaminant that could impact the parameters or values used in the predicted 1-hour maximum ground level concentration; re-model change(s) to demonstrate that the MAGLC has not been exceeded. R - collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F): a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled; the MAGLC for each significant toxic contaminant or worst-case contaminant, calculated in accordance with ORC 3704.03(F); a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the EU(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant; and documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the EU(s) or the materials applied; maintain record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour

Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
											maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration. Rp - submit annual reports identifying any changes to any parameter or value used in the dispersion model used to demonstrate compliance with the "Toxic Air Contaminant Statute", ORC 3704.03(F), through the predicted 1-hour maximum concentration; include original model input; updated model input; reason for change(s) to input parameter(s); summary of results of updated modeling, including input changes; and a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC; submit annual reports identifying any changes made to the exhaust stack during the reporting period, if no changes have been made the report shall include a statement to that effect; submit deviation report within 30 days of burning fuel other than NG
P001 & P002	See Comments	40 CFR Part 60, Subpart A	N	N	N	N	N	N	N	N	40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions pertinent to EUs affected by 40 CFR Part 60.
P001 & P002	See Comments	40 CFR Part 60, Subpart KKKK	N	Y	Y	N	Y	Y	N	N	Emission limit less stringent than OAC rule 3745-31-10 through 20. OR - Comply with General Compliance Requirements under 60.4333(a); operate and maintain EU, APCE, and monitoring equipment in a manner



Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
											consistent with good air pollution control practices including during SU, SD, and malfunction M - comply with the applicable monitoring and/or recordkeeping including CEM requirements as described in §§ 60.4335(b) and 60.4345; requirements for equipment using a NO_x CEMS; using data from the CEM equipment to identify excess emissions; determining total sulfur content of combustion fuel; exemption from monitoring total fuel sulfur content Rp – submit quarterly reports identifying excess emissions for EUs using CEMS per 60.4375(a), 60.4380(b), and 60.4395. ET - Conduct initial performance test with NO_x diluent CEMS (60.4405) and initial and subsequent sulfur performance tests (60.4415)
P001 & P002	See Comments	40 CFR Part 60, Subpart TTTT	Y	N	Y	Y	N	N	N	N	ND - Emission limit less stringent than OAC rules 3745-31-10 through 20. M – comply with: all monitoring and data collection requirements; compliance demonstrations with CO₂ emissions; and determining excess emissions R – comply with record keeping requirements per 60.5560 and 60.5565 Rp – comply with notification requirements according to 60.5550 and submittal of required reports per 60.5555



Emissions Unit Table

EU(s)	Limitation	Basis	ND	OR	M	R	Rp	ET	ENF	Misc	Comments
P001 & P002	See Comments	40 CFR Part 60, Subpart A	N	N	N	N	N	N	N	N	Table 3 to Subpart TTTT of 40 CFR Part 60 – Applicability of General Provisions to Subpart TTTT shows which parts of the General Provisions in 40 CFR 60.1 - 60.19 apply.
P001 & P002	See Comments	40 CFR Part 63, Subpart YYYY	Y	N	N	N	N	N	N	N	N/A - facility is not a major source of HAP emissions.



**Environmental
Protection
Agency**

DRAFT

Division of Air Pollution Control
Title V Permit
for
Trumbull Energy Center

Facility ID:	0278112011
Permit Number:	P0140836
Permit Type:	Initial
Issued:	10/15/2026
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance

Division of Air Pollution Control
Title V Permit
for
Trumbull Energy Center

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Authorization

Facility ID: 0278112011
Facility Description: 940 MW combined cycle gas turbine (CCGT) facility
Application Number(s): A0082148
Permit Number: P0140836
Permit Description: Initial Title V permit for a 940 MW combined cycle gas turbine (CCGT) power plant.
Permit Type: Initial
Issue Date:
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number:

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

Trumbull Energy Center
Henn Parkway
Lordstown, OH 44481

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

Ohio EPA DAPC, Northeast District Office
8957 Canyon Falls Blvd.
Twinsburg, OH 44087
(330)963-1200

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 Ohio EPA DAPC, Northeast District Office. 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 and no later than 6 months prior to the expiration date.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

John Logue
Director

List of Commonly Used Abbreviations

AP-42 = U.S. EPA's Compilation of Air Pollution Emissions Factors	HVLP = high volume, low pressure	PER = Permit Evaluation Report
ASTM = American Society for Testing and Materials	LAER = lowest achievable emission rate	PM = particulate matter
BACT = Best Available Control Technology	lb(s)/hr = pound(s) per hour	PM ₁₀ = particulate matter with an aerodynamic diameter less than or equal to 10 microns
BAT = Best Available Technology	LDAR = leak detection and repair	PM _{2.5} = particulate matter with an aerodynamic diameter less than or equal to 2.5 microns
CAA = Clean Air Act	LPG = liquefied petroleum gas/propane	ppb = parts per billion
CAM = compliance assurance monitoring	MACT = maximum achievable control technology	ppm = parts per million
CEMS = continuous emissions monitoring system	MAGLC = maximum acceptable ground level concentration	PSD = Prevention of Significant Deterioration
CFC = chlorofluorocarbon	mg/m ³ = milligrams per cubic meter	psi = pounds per square inch
CFR = Code of Federal Regulations	MM = million	psia = pounds per square inch absolute
CH ₄ = methane	MMBtu = million British Thermal Units	PTE = potential-to-emit
CI = compression ignition	MSDS = material safety data sheet	PTI = Permit-to-Install
CO = carbon monoxide	MSW = municipal solid waste	PTIO = Permit-to-Install and Operate
CO ₂ = carbon dioxide	NAAQS = National Ambient Air Quality Standard	PTO = Permit-to-Operate
COM = continuous opacity monitor	NESHAP = National Emission Standard for Hazardous Air Pollutants	PWR = process weight rate
DAPC = Division of Air Pollution Control	NG = natural gas	RACM = reasonably available control measures
DO/LAA = District Office/Local Air Agency	ng/m ³ = nanograms per cubic meter	RACT = reasonably available control technology
dscf = dry standard cubic foot	NH ₃ = ammonia	RATA = relative accuracy test audit
EAC = emissions activity category	NMHC = non-methane hydrocarbons	RTO = regenerative thermal oxidizer
eDocs = electronic documents database	NMOC = non-methane organic compound	SB265 = Senate Bill 265
ERAC = Environmental Review Appeals Commission	NO = nitrogen oxide	scfm = standard cubic feet per minute
ESP = electrostatic precipitator	NO ₂ = nitrogen dioxide	SI = spark ignition
EU = emissions unit	NO _x = nitrogen oxides	SIP = State Implementation Plan
FEPTIO = Federally Enforceable Permit-to-Install and Operate	NSPS = New Source Performance Standard	SO ₂ = sulfur dioxide
FER = Fee Emissions Report	NSR = New Source Review	SSMP = startup, shutdown, and malfunction plan
FR = Federal Register	NTV = Non-Title V	TDS = total dissolved solids
GACT = generally achievable control technology	O&M = operation and maintenance	TLV = threshold limit value
GHG = greenhouse gases	OAC = Ohio Administrative Code	TO = thermal oxidizer
gr/dscf = grains per dry standard cubic foot	OC = organic compound	TPH = ton(s) per hour
H ₂ S = hydrogen sulfide	Ohio EPA = Ohio Environmental Protection Agency	TPY = ton(s) per year
H ₂ SO ₄ = sulfuric acid	ORC = Ohio Revised Code	TSP = total suspended particulates
HAP = hazardous air pollutant	Pb = lead	VE = visible particulate emissions
HCl = hydrogen chloride	PBR = Permit-By-Rule	VMT = vehicle miles traveled
HF = hydrogen fluoride	PCB = polychlorinated biphenyl	VOC = volatile organic compound
Hg = mercury	PE = particulate emissions	WPP = work practice plan
hp = horsepower	PEMS = predictive emissions monitoring system	µg/m ³ = micrograms per cubic meter



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 for State-Only Requirements
 - (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
 - (5) Standard Term and Condition A. 30., Submitting Documents Required by this Permit

[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 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 submitted scheduled maintenance requests, 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 submitted promptly to the Ohio EPA DAPC, Northeast District Office. Except as provided below, the written reports shall be submitted by January 31, April 30, July 31, and October 31 of each year; and each report shall cover the previous calendar quarter.

In identifying each deviation, the permittee shall specify the emission limitation(s), operational restriction(s), and/or control device operating parameter limitation(s) for which the deviation



occurred, describe each deviation, and provide the estimated magnitude and duration of each deviation.

These written 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.20, 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 to the Ohio EPA DAPC, Northeast District Office 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." Signature by the Responsible Official may be represented by entry of the personal identification number (PIN) by the Responsible Official as part of the electronic submission process or by the scanned attestation document signed by the Responsible Official that is attached to the electronically submitted written report.

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

- (5) Consistent with A.2.c.1. above, reports of any required monitoring and/or record keeping information required to be submitted to Ohio EPA shall be submitted to Ohio EPA DAPC, Northeast District Office unless otherwise specified.

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

3. Reporting of Any Exceedance of a Federally Enforceable Emission Limitation or Control Requirement Resulting from 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) 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 except as provided pursuant to A.16 below.
- c) This permit may be modified, reopened, revoked, or revoked and reissued, for cause, in accordance with 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 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 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 contaminant 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, OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77-07(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 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 Ohio EPA DAPC, Northeast District Office 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 Ohio EPA DAPC, Northeast District Office) 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 on or before April 30th of each year during the permit term.
 - (2) Compliance certifications shall include the following:
 - a. Identification of each term or condition that is the basis of the certification. The identification may include a statement by the Responsible Official that every term and condition that is federally enforceable has been reviewed, and such terms and conditions with which there has been continuous compliance throughout the year are not separately identified.
 - b. The permittee's current compliance status.
 - c. Whether compliance was continuous or intermittent consistent with A.13.d)(2)a. above.
 - d. The method(s) used for determining the compliance status of the source currently and over the required reporting period consistent with A.13.d)(2)a. above.
 - 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 [defined as "Title I modification" in OAC rule 3745-77-01], 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 Ohio EPA DAPC, Northeast District Office 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 Ohio EPA DAPC, Northeast District Office 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 activities and emissions levels" as defined in OAC rule 3745-77-01. 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 Federal Register 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 is subject to 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), 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.

Unless otherwise exempted, no emissions unit identified in this permit that has been 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 operating 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 Ohio EPA DAPC, Northeast District Office.
- 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 Ohio EPA DAPC, Northeast District Office. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, 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 for State-Only Requirements

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 Ohio EPA DAPC, Northeast District Office 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 Ohio EPA DAPC, Northeast District Office 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 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 potential to emit; or
- c) Where the company's Responsible Official has certified that an emissions unit has been permanently shut down.

30. Submitting Documents Required by this Permit

All applications, notifications or reports required by terms and conditions in this permit to be submitted or "reported in writing" are to be submitted to Ohio EPA through the Ohio EPA's eBusiness Center: Air Services web service ("Air Services"). Ohio EPA will accept hard copy submittals on an as-needed basis if the permittee

cannot submit the required documents through the Ohio EPA eBusiness Center. In the event of an alternative hard copy submission in lieu of the eBusiness Center, the post-marked date or the date the document is delivered in person will be recognized as the date submitted. Electronic submission of applications, notifications, or reports required to be submitted to Ohio EPA fulfills the requirement to submit the required information to the Director, the Ohio EPA DAPC, Northeast District Office, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the required application, notification or report is considered to be "submitted" on the date the submission is successful using a valid electronic signature. Signature by the Responsible Official may be represented as provided through procedures established in Air Services.



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. Transportation Rule (TR) Trading Program Requirements
 - a) The permittee shall comply with all applicable Cross-State Air Pollution Rule (CSAPR) requirements (40 CFR Part 97, Subparts AAAAA – DDDDD) by the compliance date specified in 40 CFR 97, Subparts AAAAA – DDDDD.
 - b) The TR subject units, and the unit-specific monitoring provisions at this source, are identified in the following table. These units are subject to the requirements for the TR NO_x Annual Trading Program and TR NO_x Ozone Season Trading Program.

<u>Unit ID:</u> P001 and P002 - Combined cycle combustion turbines (3,025 MMBtu/hr heat input turbine and 237 MMBtu/hr heat input duct burner) with dry low NO _x combustors, selective catalytic reduction (SCR), and catalytic oxidizer.					
Parameter	Continuous emission monitoring system or systems (CEMS) requirements pursuant to 40 CFR part 75, subpart H (for NO _x monitoring)	Excepted monitoring system requirements for gas- and oil-fired units pursuant to 40 CFR part 75, appendix D	Excepted monitoring system requirements for gas- and oil-fired peaking units pursuant to 40 CFR part 75, appendix E	Low Mass Emissions excepted monitoring (LME) requirements for gas- and oil-fired units pursuant to 40 CFR 75.19	EPA-approved alternative monitoring system requirements pursuant to 40 CFR part 75, subpart E
NO _x	X				
Heat input					

- c) The above description of the monitoring used by a unit does not change, create an exemption from, or otherwise affect the monitoring, recordkeeping, and reporting requirements applicable to the unit under 40 CFR 97.430 through 97.435 (TR NO_x Annual Trading Program), and 97.530 through 97.535 (TR NO_x Ozone Season Trading Program), as applicable]. The monitoring, recordkeeping and reporting requirements applicable to each unit are included below in the standard conditions for the applicable TR trading programs.



- d) Owners and operators must submit to the Administrator a monitoring plan for each unit in accordance with 40 CFR 75.53, 75.62 and 75.73, as applicable. The monitoring plan for each unit is available at the EPA's website at <http://www.epa.gov/airmarkets/emissions/monitoringplans.html>.
- e) Owners and operators that want to use an alternative monitoring system must submit to the Administrator a petition requesting approval of the alternative monitoring system in accordance with 40 CFR part 75, subpart E and 40 CFR 75.66 and 97.435 (TR NO_x Annual Trading Program), and 97.535 (TR NO_x Ozone Season Trading Program). The Administrator's response approving or disapproving any petition for an alternative monitoring system is available on the EPA's website at <http://www.epa.gov/airmarkets/emissions/petitions.html>
- f) Owners and operators that want to use an alternative to any monitoring, recordkeeping, or reporting requirement under 40 CFR 97.430 through 97.434 (TR NO_x Annual Trading Program), and 97.530 through 97.534 (TR NO_x Ozone Season Trading Program) must submit to the Administrator a petition requesting approval of the alternative in accordance with 40 CFR 75.66 and 97.435 (TR NO_x Annual Trading Program), and 97.535 (TR NO_x Ozone Season Trading Program). The Administrator's response approving or disapproving any petition for an alternative to a monitoring, recordkeeping, or reporting requirement is available on EPA's website at <http://www.epa.gov/airmarkets/emissions/petitions.html>.
- g) The descriptions of monitoring applicable to the unit included above meet the requirement of 40 CFR 97.430 through 97.434 (TR NO_x Annual Trading Program), 97.530 through 97.534 (TR NO_x Ozone Season Trading Program), and therefore minor permit modification procedures, in accordance with 40 CFR 70.7(e)(2)(i)(B) or 71.7(e)(1)(i)(B), may be used to add to or change this unit's monitoring system description.
- h) TR NO_x Annual Trading Program requirements

Designated representative requirements	97.406(a), 97.413-97.418
Emissions monitoring, reporting and recordkeeping requirements	97.406(b), 97.430-97.435
NO _x emissions requirements	97.406(c)
Title V permit revision requirements	97.406(d)
Additional recordkeeping and reporting requirements	97.406(e)
Liability	97.406(f)
Effect on other authorities	97.406(g)

- i) TR NO_x Ozone Season Trading Program requirements

Designated representative requirements	97.506(a), 97.513-97.518
Emissions monitoring, reporting and recordkeeping requirements	97.506(b), 97.530-97.535
NO _x emissions requirements	97.506(c)



Title V permit revision requirements	97.506(d)
Additional recordkeeping and reporting requirements	97.506(e)
Liability	97.506(f)
Effect on other authorities	97.506(g)

3. The permittee shall ensure that any EU(s) subject to the Cross-State Air Pollution Rule (CSAPR) complies/comply with the requirements of the Ohio Administrative Code (OAC) Chapter 3745-109, which includes submitting timely permit applications.
4. The following EU contained in this permit is subject to 40 CFR Part 60, Subparts A and Dc: B001. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the electronic Code of Federal Regulations (e-CFR) website www.ecfr.gov or by contacting the Ohio EPA Northeast District Office.
5. The following EUs contained in this permit are subject to 40 CFR Part 60, Subparts A, KKKK and TTTT: P001 and P002. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the electronic Code of Federal Regulations (e-CFR) website www.ecfr.gov or by contacting the Ohio EPA Northeast District Office.
6. The following EUs operated on site are subject to 40 CFR Part 60, Subparts A and IIII: P003 and P004. The complete NSPS requirements, including the NSPS General Provisions may be accessed via the internet from the electronic Code of Federal Regulations (e-CFR) website www.ecfr.gov or by contacting the Ohio EPA Northeast District Office.
7. 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 permit issued to this facility.
8. 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.
9. The following EUs operated on site are subject to 40 CFR Part 63, Subparts A and ZZZZ: P003 and P004. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the electronic Code of Federal Regulations (e-CFR) website www.ecfr.gov or by contacting the OEPA Northeast District Office (NEDO).
10. Insignificant EUs

The insignificant EUs listed below are subject to requirements contained in a PTI, subject to a requirement in the SIP approved versions of OAC Chapters 3745-17, 3745-18, 3745-21, and 3745-31, subject to a federal rule requirement, or otherwise subject to an *Applicable Requirement*, as defined in OAC Rule 3745-77-01:



EU ID(s)	Operations, Property and/or Equipment Description	Applicable Requirement(s)
P003	Emergency Generator (Mitsubishi) 1,881 hp (1,403 kW), diesel-fired, 4.09 liter per cylinder displacement.	PTI P0123959 40 CFR Part 60, Subpart IIII - CI ICE 40 CFR Part 63, Subpart ZZZZ - RICE
P004	Emergency Fire Pump (Clarke) 175 hp (131 kW), diesel-fired, 1.13 liters per cylinder displacement	PTI P0123959 40 CFR Part 60, Subpart IIII - CI ICE 40 CFR Part 63, Subpart ZZZZ - RICE
P006	Emergency Diesel-Fired Generator (1,403 kW)	PTI P0124011
P007	Space Heaters (12). Natural gas-fired. Each at 0.25 MMBtu/hr	Permit Exempt



C. Emissions Unit Terms and Conditions



1. B001, Auxiliary Boiler

Operations, Property and/or Equipment Description:

Auxiliary Boiler 37.8 MMBtu/hr

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

(1) b)(1)c.

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to PM _{2.5} , PM ₁₀ , NO _x , CO, SO ₂ and VOC emissions from this air contaminant source since the PTE is less than 10 TPY.
b.	OAC rules 3745-31-10 through 20 (PSD of Air Quality) PTI P0127662 effective 2/25/2020	CO emissions shall not exceed 0.055 pound per million Btu (lb/MMBtu) of heat input, 2.08 pounds per hour (lbs/hr) and 2.08 tons per rolling, 12-month period. NO _x emissions shall not exceed 0.020 lb/MMBtu of heat input, 0.76 lb/hr and 0.76 ton per rolling, 12-month period. PM emissions less than 10 microns in diameter (PM ₁₀) and PM less than 2.5 microns in diameter (PM _{2.5}) shall not exceed 0.008 lb/MMBtu of heat input, 0.30 lb/hr and 0.30 ton per rolling, 12-month period. VOC emissions shall not exceed 0.006 lb/MMBtu of heat input, 0.23 lb/hr and 0.23 ton per rolling, 12-month period.



		SO₂ emissions shall not exceed 1.5E-03 lb/MMBtu of heat input, 0.06 lb/hr and 0.06 ton per rolling, 12-month period. H₂SO₄ emissions shall not exceed 2.3E-04 lb/MMBtu, 0.0087 lb/hr and 0.0087 ton per rolling, 12-month period. CO₂e emissions shall not exceed 4,456 tons per rolling, 12-month period. Visible PE from the stack serving this EU shall not exceed 10% opacity as a 6-minute See b)(2)a. and b)(2)b.
c.	OAC rule 3745-31-05(F)	See b)(2)h.
d.	OAC rule 3745-17-07(A)	See b)(2)c.
e.	OAC rule 3745-17-10(B)(1)	See b)(2)c.
f.	OAC rule 3745-110-03(K)(20)	Exemption - see b)(2)i.
g.	40 CFR Part 60, Subpart A (40 CFR 60.1 - 40 CFR 60.19)	See b)(2)d.
h.	40 CFR Part 60, Subpart Dc (40 CFR 60.40c - 40 CFR 60.48c)	See b)(2)e. and b)(2)f.
i.	40 CFR Part 63, Subpart JJJJJJ (40 CFR 63.11193 - 63.11236)	See b)(2)g.
j.	40 CFR Part 63, Subpart A (40 CFR 63.1 - 40 CFR 63.16)	See b)(2)j.

(2) Additional Terms and Conditions

- a. All PE are assumed to be less than 2.5 microns in diameter. The PM₁₀/PM_{2.5} emissions limitations include both filterable and condensable PE.
- b. The lb/MMBtu and lb/hr emission limitations are based on the EU's PTE. Therefore, no monitoring, record keeping, and reporting requirements are necessary to ensure ongoing compliance with these emission limitations.
- c. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-10 through 20.



- d. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to EUs affected by 40 CFR Part 60.
- e. This rule does not establish emission limitations for NG-fired boilers, but does require record keeping of gas usage 40 CFR 60.48c(g).
- f. This EU is subject to the applicable provisions of Subpart Dc of the 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 OEPA. The requirements of 40 CFR Part 60 are also federally enforceable.
- g. This unit is exempt from requirements of this rule per 40 CFR 63.11195(e) due to combusting only NG.
- h. The maximum annual operating hours for this EU shall not exceed 2,000 hours per rolling, 12-month period.
- i. The permittee is exempt from the requirements of OAC rule 3745-110-03(A) through (G) since this permit restricts NO_x emissions from this EU to less than 25 TPY.
- j. Table 8 to Subpart JJJJJJ of 40 CFR Part 63 – Applicability of General Provisions to Subpart JJJJJJ shows which parts of the General Provisions in 40 CFR 63.1 - 63.16 apply.

c) Operational Restrictions

- (1) The permittee shall burn only NG in this EU.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0127662]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than NG, the permittee shall maintain a record of the type and quantity of fuel burned in this EU.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (2) The permittee shall maintain monthly records of the following information:

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (3) See 40 CFR Part 60, Subpart Dc (40 CFR 60.40c-48c). The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 60, Subpart Dc, including the following sections:



60.48c(g)(2)	record and maintain records of the amount of each fuel combusted during each calendar month
60.48c(i)	maintain records for a period of two years following the date of such record

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (4) The permittee shall perform monthly checks, when the EU is in operation and when the weather conditions allow, for any visible PE from the stack serving this EU. The presence or absence of any VE shall be noted in an operations log. If VE are observed, the permittee shall also note the following in the operations log:
- the color of the emissions;
 - whether the emissions are representative of normal operations;
 - if the emissions are not representative of normal operations, the cause of the abnormal emissions;
 - the total duration of any VE incident; and
 - any corrective actions taken to minimize or eliminate the VE.

If VE are present, a VE incident has occurred. The observer does not have to document the exact start and end times for the VE incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the VE incident was continuous during the observation period (or, if known, continuous during the operation of the EU). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the VE were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the EU continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal VE.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (5) The operations log required in d)(4) above shall be maintained on site.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than NG was burned in this EU. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (2) Pursuant to 40 CFR Part 60.7 and 60.48c(a), the permittee is hereby advised of the requirement to report the following at the appropriate times:
- construction date (no later than 30 days after such date);
 - actual start-up date (within 15 days after such date); and



- c. the design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
 - a. all exceedances of the rolling, 12-month limitation on the hours of operation for this EU; and
 - b. the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative hours of operation.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (4) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 60, Subpart Dc, including the following sections:

60.48c(a)(1) through (4)	submit notification of the date of construction or reconstruction and actual startup, as provided by § 60.7
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[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (5) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the OEPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

f) **Testing Requirements**

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

- a. Emission Limitation:

CO emissions shall not exceed 0.055 lb/MMBtu of heat input, 2.08 lbs/hr, and 2.08 tons per rolling, 12-month period.

Applicable Compliance Method:

The lb/MMBtu emission limitations are based on BACT/LAER Precedents for Auxiliary Boilers provided in the permit application. The hourly emission limitation was developed by multiplying the maximum heat input (37.8 MMBtu/hr) by the CO emission factor supplied by the manufacturer (0.055 lb/MMBtu) to determine the hourly emissions.

The annual emission limitation was developed by multiplying the hourly emission limitation (2.08 lbs/hr) by the maximum annual operating hours (2,000 hrs/yr) and



dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the hourly limitation is shown.

The permittee shall demonstrate compliance using Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the OEPA. See f)(2).

b. Emission Limitation:

NO_x emissions shall not exceed 0.020 lb/MMBtu of heat input, 0.76 lb/hr, and 0.76 ton per rolling, 12-month period.

Applicable Compliance Method:

The lb/MMBtu emission limitations are based on BACT/LAER Precedents for Auxiliary Boilers provided in the permit application. The hourly emission limitation was developed by multiplying the maximum heat input (37.8 MMBtu/hr) by the NO_x emission factor supplied by the manufacturer (0.020 lb/MMBtu) to determine the hourly emissions.

The annual emission limitation was developed by multiplying the hourly emission limitation (0.76 lb/hr) by the maximum annual operating hours (2,000 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the annual operating hours limitation is shown.

The permittee shall demonstrate compliance using Methods 1 through 4 and 7E of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the OEPA. See f)(2).

c. Emission Limitation:

PM₁₀ and PM_{2.5} shall not exceed 0.008 lb/MMBtu of heat input, 0.30 lb/hr, and 0.30 ton per rolling, 12-month period.

Applicable Compliance Method:

The lb/MMBtu emission limitations are based on BACT/LAER Precedents for Auxiliary Boilers provided in the permit application. The hourly emission limitation was developed by multiplying the maximum heat input (37.8 MMBtu/hr) by the PM₁₀/PM_{2.5} emission factor supplied by the manufacturer (0.008 lb/MMBtu) to determine the hourly emissions.

The annual emission limitation was developed by multiplying the hourly emission limitation (0.30 lb/hr) by the maximum annual operating hours (2,000 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the annual operating hours limitation is shown.



If required, the permittee shall demonstrate compliance with these emission limitations using Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the OEPA. See f)(2).

d. Emission Limitation:

SO₂ emissions shall not exceed 1.5E-03 lb/MMBtu of heat input, 0.06 lb/hr and 0.06 ton per rolling, 12-month period.

Applicable Compliance Method:

The lb/MMBtu limitation was established based on using pipeline quality NG having a maximum sulfur content of 0.5 grain per 100 cubic feet according to the following calculation. Multiply the maximum sulfur content of NG (0.5 grain S/100 scf) by the molecular weight of SO₂ (64.07 lb SO₂/lb-mole), divide by the molecular weight of sulfur (32.06 lb S/lb-mole), divide by (7,000 grains/lb), divide by manufacturer's gas specification (983 Btu/scf), and multiply by (10⁶ Btu/MMBtu). The hourly emission limitation was developed by multiplying the lb/MMBtu emission limitation (1.5E-03 lb/MMBtu) by the maximum heat input (37.8 MMBtu/hr) to determine hourly emissions.

Representative NG sampling data which show that the sulfur content of the NG does not exceed 1.5E-03 lb/MMBtu of SO₂ heat input in accordance with 40 CFR 60.4415.

The annual emission limitation was developed by multiplying the hourly emission limitation (0.06 lb/hr) multiplied by the maximum annual operating hours (2,000 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the annual operating hours limitation is shown.

e. Emission Limitation:

VOC emissions shall not exceed 0.006 lb/MMBtu of heat input, 0.23 lb/hr, and 0.23 ton per rolling, 12-month period.

Applicable Compliance Method:

The lb/MMBtu emission limitations are based on BACT/LAER Precedents for Auxiliary Boilers provided in the permit application. The hourly emission limitation was developed by multiplying the maximum heat input (37.8 MMBtu/hr) by the VOC emission factor (0.006 lb/MMBtu) to determine the hourly emissions.

The annual emission limitation was developed by multiplying the hourly emission limitation (0.23 lb/hr) by the maximum annual operating hours (2,000 hrs/yr) and dividing by 2,000 pounds per ton. Therefore, compliance with the annual limitation shall be demonstrated if compliance with the annual operating hours limitation is shown.

If required, the permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to



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

f. Emission Limitation:

H₂SO₄ emissions shall not exceed 2.3E-04 lb/MMBtu, 0.0087 lb/hr, and 0.0087 ton per rolling, 12-month period.

Applicable Compliance Method:

The lb/MMBtu emission limitation is based on the assumption that 10% of the SO₂ emissions are converted to SO₃ and then converted to H₂SO₄ when combined with water vapor by the following calculation:

$$1.5\text{E-}03 \text{ lb SO}_2/\text{MMBtu} (0.10) (98 \text{ lb H}_2\text{SO}_4/\text{lb-mole}) (\text{lb-mole}/64 \text{ lb SO}_2) = 2.3\text{E-}04 \text{ lb H}_2\text{SO}_4/\text{MMBtu}$$

Multiply the lb H₂SO₄/MMBtu (2.3E-04 lb/MMBtu) by the maximum heat input (37.8 MMBtu/hr) to determine the maximum hourly H₂SO₄ emissions (0.0087 lb/hr), and multiply by the maximum annual hours of operation (2,000 hrs/yr) divided by 2,000 lbs/ton to determine the annual H₂SO₄ emissions (0.0087 ton/yr).

These emission limitations are based on manufacturer's data.

If required, the permittee shall demonstrate compliance using Methods 1 through 4 and 8 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the OEPA. See f)(2).

g. Emission Limitation:

CO₂e emissions shall not exceed 4,456 tons per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation was established to reflect the PTE for this EU by calculating the sum of the product of the maximum NG firing rate (37.8 MMBtu/hr) multiplied by the AP-42 emission factors for CO₂, N₂O, and CH₄ from Table 1.4-2 dated 7/98 (120,000 lbs/mmescf, 0.64 lb/mmescf, and 2.3 lbs/mmescf, respectively), multiplied by the global warming potentials for CO₂, N₂O, and CH₄ (1, 298, and 25, respectively from Table A-1 to Subpart A of 40 CFR Part 98). Divide by the average heating value used for AP-42 emission factors in Table 1.42 dated 7/98 (1,020 Btu/scf), multiply by the maximum annual hours of operation (2,000 hrs/yr) and divide by 2,000 pounds per ton.

$$\begin{aligned} & \left(37.8 \frac{\text{mmBtu}}{\text{hr}} \right) \times \left[\left(120,000 \frac{\text{lbs}}{\text{mmescf}} \times (1) \right) + \left(0.64 \frac{\text{lb}}{\text{mmescf}} (298) \right) \right. \\ & \quad \left. + \left(2.3 \frac{\text{lbs}}{\text{mmescf}} (25) \right) \right] \times \left(\frac{\text{mmescf}}{1020 \text{ mmBtu}} \right) \left(2,000 \frac{\text{hrs}}{\text{hr}} \right) \times \left(\frac{\text{ton}}{2,000 \text{ lbs}} \right) \\ & = 4,456 \frac{\text{tons}}{\text{yr}} \end{aligned}$$



Since the CO₂e emissions are estimated to consist of more than 99% CO₂, compliance with this emission limitation will be assumed provided that the lb/scf CO₂ emission rate does not exceed 120,000 lbs/mmscf.

If required, the permittee shall conduct emissions testing using Methods 1, 2, 3A and 4 of 40 CFR Part 60, Appendix A, mass balance calculations using ASTM D1945-03 (Standard Test Method for Analysis of Natural Gas by Gas Chromatography) and/or ASTM D1826-94 (Standard Test Method for Calorific Value of Gases in Natural Gas Range by Continuous Recording Calorimeter) to determine the lb/scf CO₂ emission rate. Alternative U.S. EPA-approved test methods may be used with prior approval from the OEPA.

h. Emission Limitation:

Visible PE from the stack serving this EU shall not exceed 10% opacity as a 6-minute average.

Applicable Compliance Method:

If required, compliance with the stack visible PE limitation shall be demonstrated through VE observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (2) The permittee shall conduct, or have conducted, emission testing for this EU in accordance with the following requirements:
- a. The emission testing shall be conducted at the discretion of the Director pursuant to Ohio EPA Engineering Guide #16.
 - b. The emission testing shall be conducted to demonstrate compliance with the following emission limitations:
 - i. CO emissions in lb/hr and lb/MMBtu; and
 - ii. NO_x emissions in lb/hr and lb/MMBtu.
 - c. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):

for CO, Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A; and

for NO_x, Methods 1 through 4 and 7E of 40 CFR Part 60, Appendix A.

Alternative U.S. EPA-approved test methods may be used with prior approval from the OEPA.
 - d. During the emissions testing, the EU shall be operated under operational conditions approved in advance by the OEPA. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.) or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be



done under worst case conditions expected during the life of the permit. As part of the information provided in the Intent to Test (ITT) notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe worst case operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the OEPA that the proposed operating conditions constitute worst case. Failure to test under the approved conditions may result in OEPA not accepting the test results as a demonstration of compliance.

- e. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an ITT notification to the OEPA. The ITT notification shall describe in detail the proposed test methods and procedures, the EU 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 OEPA's refusal to accept the results of the emission test(s).
- f. Personnel from the OEPA 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 EU and the testing procedures provide a valid characterization of the emissions from the EU and/or the performance of the control equipment.
- g. A comprehensive written report on the results of the emissions test(s) shall be signed by the person(s) responsible for the tests and submitted to the OEPA 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 OEPA.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

g) Miscellaneous Requirements

- (1) Initial emissions testing for VOC, SO₂, H₂SO₄, CO, NO_x, and PM₁₀/PM_{2.5} was conducted on August 27, 2025.
- (2) The most recent emissions testing for VOC, NO_x, and CO was conducted on November 21, 2025.



2. P005, Wet Cooling Tower

Operations, Property and/or Equipment Description:

Wet Cooling Tower

- a) The following EU 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 EU along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3)(a)(ii) June 30, 2008	The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM _{2.5} or PM ₁₀ emissions from this air contaminant source since the PTE is less than 10 TPY.
b.	OAC rules 3745-31-10 through 20 (PSD of Air Quality) PTI P0127662 effective 2/25/2020	PM ₁₀ emissions shall not exceed 1.36 pounds per hour (lbs/hr) and 5.95 tons per rolling, 12-month period. PM _{2.5} emissions shall not exceed 0.54 lb/hr and 2.38 tons per rolling, 12-month period. The permittee shall install a drift eliminator with a maximum drift rate of 0.0005% on this EU. Visible PE shall not exceed 10% opacity as a 6-minute average. The presence of condensed water vapor shall not be deemed a violation for failure of stack emissions meeting this VE limitation. See c)(1).
c.	OAC rule 3745-17-07(A)(1)	See b)(2)a.
d.	OAC rule 3745-17-11(B)	See b)(2)a.



- (2) Additional Terms and Conditions
 - a. The emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rules 3745-31-10 through 20.
- c) Operational Restrictions
 - (1) The permittee shall maintain the TDS concentration of the cooling water less than or equal to 3,500 milligrams per liter (mg/l).
[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0127662]
- d) Monitoring and/or Recordkeeping Requirements
 - (1) The permittee shall properly install, operate and maintain a conductivity meter or other equipment to continuously monitor and record the TDS concentration of the cooling tower water. The monitoring devices shall be installed, calibrated, operated and maintained in accordance with the manufacturer's recommendations, instructions and operating manuals.
[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]
 - (2) Since the TDS data measured by the conductivity meter or other equipment is based on a correlation between conductivity and TDS, an exceedance measured by the conductivity meter or equivalent is not a violation of the TDS operational restriction, but rather serves as an indicator to initiate corrective action by the permittee to reduce the TDS concentration.
[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]
 - (3) If the conductivity is found to be outside the acceptable parameter range submitted to OEPA in accordance with section f)(2), the permittee shall increase the cooling tower blowdown rate as the primary corrective action to decrease the TDS level in the circulating water to restore the conductivity into an acceptable range within 24 hours or less.
[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]
- e) Reporting Requirements
 - (1) The permittee shall submit quarterly deviation (excursion) reports that identify all hourly TDS readings in excess of 3,500 mg/l. The reports shall identify corrective action taken to reduce the TDS concentration.
The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Ts & Cs of this permit.
[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]
 - (2) Prior to startup, the permittee shall submit written documentation provided by the vendor/manufacturer of the maximum drift rate of 0.0005% for the drift eliminator and the premise, basis and justification for the drift rate.
[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]
 - (3) Unless other arrangements have been approved by the Director, all notifications and reports shall be submitted through the OEPA's eBusiness Center: Air Services online web portal.



[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

f) Testing Requirements

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

a. Emissions Limitation

PM₁₀ emissions shall not exceed 1.36 lbs/hr and 5.95 tons per rolling, 12-month period.

Applicable Compliance Method:

The lb/hr PM₁₀ emission limitation is based on multiplying the maximum re-circulating water flow rate (155,083 gal/min) by the maximum TDS concentration (3,500 mg/l) multiplied by 3.785 l/gal multiplied by the decimal fraction drift rate per flow (0.0005/100) divided by [(1,000 mg/g)(60 sec/min)(453.6 g/lb)/(3,600 sec/hr)].

The annual emission limitation is based on multiplying the hourly emission limitation (1.36 lbs/hr) by the maximum annual hours of operation (8,760 hrs/yr) and dividing by (2,000 lbs/ton).

Compliance with the hourly and annual emission limitation will be assumed provided that the TDS concentration recorded in d) remains below 3,500 mg/l.

b. Emission Limitation:

PM_{2.5} emissions shall not exceed 0.54 lb/hr and 2.38 tons per rolling, 12-month period.

Applicable Compliance Method:

Per permit application, PM_{2.5} is 40% of PM₁₀ as calculated above. The permittee calculated the PM₁₀ fraction using AWMA Abstract No. 216, Session No. AM-1b, Orlando, 2001.

The annual emission limitation is based on multiplying the hourly emission limitation (0.54 lb/hr) by the maximum annual hours of operation (8,760 hrs/yr) and dividing by (2,000 lbs/ton).

Compliance with the hourly and annual emissions limitation will be assumed provided that the TDS concentration recorded in d) remains below 3,500 mg/l.

c. Emission Limitation:

The permittee shall install a drift eliminator with a maximum drift rate of 0.0005% on this EU.

Applicable Compliance Method:

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

Within 90 days of startup, the permittee shall submit to OEPA's Northeast District Office (NEDO) written documentation provided by the vendor/manufacturer of the maximum



drift rate of 0.0005% for the drift eliminator and the premise, basis and justification for the drift rate.

d. Emission Limitation:

The permittee shall maintain the TDS concentration of the cooling water less than or equal to 3,500 mg/l.

Applicable Compliance Method:

Compliance shall be demonstrated based upon the monitoring and record keeping requirements specified in d)(1) and d)(2).

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

e. Emission Limitation:

Visible PE shall not exceed 10% opacity as a 6-minute average. The presence of condensed water vapor shall not be deemed a violation for failure of stack emissions meeting this VE limitation.

Applicable Compliance Method:

If required, compliance with the stack visible PE limitation shall be demonstrated through VE observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (2) Within 180 days after commercial operation, the permittee shall conduct testing to develop a correlation between conductivity and TDS. This correlation shall establish an acceptable parameter range for conductivity to meet the TDS requirement. Results of the test to establish an acceptable parameter range shall be submitted to OEPA no later than 30 days after completion of the test.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

g) **Miscellaneous Requirements**

- (1) None.



**Environmental
Protection
Agency**

Draft Title V Permit

Trumbull Energy Center

Permit Number: P0140836

Facility ID: 0278112011

Effective Date: To be entered upon final issuance



3. EU Group - Combined Cycle Turbines: P001 and P002

EU ID	Operations, Property and/or Equipment Description
P001	Combined cycle combustion turbine (3,025 MMBtu/hr heat input turbine and 237 MMBtu/hr heat input duct burner) with dry low NOx combustors, selective catalytic reduction (SCR), and catalytic oxidizer.
P002	Combined cycle combustion turbine (3,025 MMBtu/hr heat input turbine and 237 MMBtu/hr heat input duct burner) with dry low NOx combustors, selective catalytic reduction (SCR), and catalytic oxidizer.

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

(1) b)(1)g., d)(12) through d)(15) and e)(8)

- b) Applicable Emissions Limitations and/or Control Requirements

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

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) and ORC 3704.03(T)	See b)(2)a. and b)(2)b.
b.	OAC rules 3745-31-10 through 20 (PSD of Air Quality) PTI P0127662 effective 2/25/2020	Visible PE from the stack serving this EU shall not exceed 10% opacity as a 6-minute average. CO ₂ e emissions shall not exceed 833 lb/MW-hr gross energy output (at full load ISO conditions without duct firing) 884 lbs/MW-hr gross energy output (maximum under any full load condition with duct firing) and 401,084 lb/hr (maximum under any condition with duct firing).



		See b)(2)c. through b)(2)h. and b)(2)p. through b)(2)r.
c.	OAC rule 3745-17-07(A)	See b)(2)i.
d.	OAC rule 3745-17-11(B)(4)	See b)(2)i.
e.	OAC rule 3745-18-06(A)	See b)(2)j.
f.	OAC rule 3745-110-03(K)(20)	Exemption from NO _x RACT requirements
g.	OAC rule 3745-114-01	See d)(12), d)(13), d)(14), d)(15) and e)(8).
h.	40 CFR Part 60, Subpart A (40 CFR 60.1 - 40 CFR 60.19)	See b)(2)k.
i.	40 CFR Part 60, Subpart KKKK (40 CFR 60.4300 - 60.4420) [In accordance with 40 CFR 60.4305(a), this EU is a stationary combustion turbine with a heat input at peak load greater than 10 MMBtu/hr with a heat recovery steam generator/duct burners subject to the emissions limitations/control measures specified in this section.]	See b)(2)i. and b)(2)m.
j.	40 CFR Part 60, Subpart TTTT (40 CFR 60.5508 - 60.5580)	The emission limitation required by this applicable rule is less stringent than the emission limitation established by OAC rules 3745-31-10 through 20. See b)(2)l., b)(2)n., d(17) and e)(4).
k.	40 CFR Part 60, Subpart A (40 CFR 60.1 - 60.19)	Table 3 to Subpart TTTT of 40 CFR Part 60 – Applicability of General Provisions to Subpart TTTT shows which parts of the General Provisions in 40 CFR 60.1 - 60.19 apply.
l.	40 CFR Part 63, Subpart YYYY (40 CFR 63.6080 - 63.6175)	See b)(2)o.



(2) Additional Terms and Conditions

- a. All requirements specified in this Section of the permit for EU Group P001 and P002 apply to each combined cycle combustion turbine (P001 and P002) unless a combined requirement is otherwise specified.
- b. Compliance with the requirements of this rule for CO, SO₂, NO_x, PM₁₀, PM_{2.5} and VOC includes compliance with the requirements of OAC rules 3745-31-10 through 20.
- c. The PM₁₀/PM_{2.5} emission limitations include both filterable and condensable PE.
- d. The emissions from this EU shall utilize the selective catalytic reduction (SCR) and catalytic oxidation units at all times during which the EU is in operation.
- e. The sulfur content of NG burned in this EU shall not exceed 0.5 grain per 100 standard cubic feet.
- f. The permittee shall comply with the following emissions limitations per turbine:

Allowable Emissions				
Pollutant	Operating Mode^a	Emission Rate^{b,e}	Emission rate, lb/hr^b	Emission rate, tons per rolling, 12-month period^f
CO	CT with DB	2.0 ^c	15.5	-
	CT only	2.0 ^c	14.6	-
	All operating modes, including startup periods	-	-	135.2
NO _x	CT with DB	2.0 ^c	25.3	-
	CT only	2.0 ^c	23.8	-
	All operating modes, including startup periods			117.6
SO ₂	CT with DB	1.5E-03 ^d	5.1	-
	CT only	1.5E-03 ^d	4.8	



Allowable Emissions				
Pollutant	Operating Mode ^a	Emission Rate ^{b,e}	Emission rate, lb/hr ^b	Emission rate, tons per rolling, 12-month period ^f
	All operating modes, including startup periods			21.0
PM ₁₀ /PM _{2.5}	CT with DB	4.6E-03 ^d	15.2	-
	CT only	6.0E-03 ^d	12.9	
	All operating modes, including startup periods			64.4
VOC	CT with DB	2.0 ^c	8.8	-
	CT only	1.0 ^c	4.1	-
	All operating modes, including startup periods	-	-	50.3
H ₂ SO ₄	CT with DB	1.1E-03 ^d	3.7	-
	CT only	1.1E-03 ^d	3.5	-
	All operating modes, including startup periods	-	-	15.8
CO ₂ e	All operating modes, including startup periods	-	-	1,683,213
a. CT = combustion turbine; DB = duct burner b. Limitation does not apply during periods of startup and shutdown. c. ppm by volume dry (ppmvd) at 15% oxygen. d. Pounds per million Btu of heat input. e. Emissions limitations are based on an hourly average.				



Allowable Emissions				
Pollutant	Operating Mode ^a	Emission Rate ^{b,e}	Emission rate, lb/hr ^b	Emission rate, tons per rolling, 12-month period ^f
f. Potential annual emissions from the proposed facility were estimated using the following worst-case assumptions: - Full-load operation of the combustion turbine generators (CTGs) for 8,760 hours per year (at 50°F ambient temperature), assuming - Duct burning for 8,760 hours per year during steady-state operation of each CTG; and - Incorporation of start-up/shutdown events, based on a representative scenario that reflects maximum emissions.				

- g. To ensure enforceability of the rolling, 12-month emissions limitations during the first 12 calendar months of operation following the initial emissions compliance testing and CEMS certification, the permittee shall not exceed the emission levels specified in the following table (per turbine):

Month(s)	CO	Maximum Allowable Cumulative Emissions (Tons)				
		NO _x	PM ₁₀ /PM _{2.5}	VOC	SO ₂	H ₂ SO ₄
1	22.5	19.6	10.7	8.4	3.5	2.6
1-2	45.0	39.2	21.4	16.8	7.0	5.2
1-3	67.5	58.8	32.1	25.2	10.5	7.8
1-4	72.0	78.4	42.8	33.6	14.0	10.4
1-5	112.5	98.0	53.5	42.0	17.5	13.0
1-6	135.2	117.6	64.4	50.3	21.0	15.8
1-7	135.2	117.6	64.4	50.3	21.0	15.8
1-8	135.2	117.6	64.4	50.3	21.0	15.8
1-9	135.2	117.6	64.4	50.3	21.0	15.8
1-10	135.2	117.6	64.4	50.3	21.0	15.8



Month(s)	CO	Maximum Allowable Cumulative Emissions (Tons)				
		NO _x	PM ₁₀ /PM _{2.5}	VOC	SO ₂	H ₂ SO ₄
1-11	135.2	117.6	64.4	50.3	21.0	15.8
1-12	135.2	117.6	64.4	50.3	21.0	15.8

After the first 12 calendar months of operation following the initial emissions compliance testing and CEMS certification, compliance with the annual emissions limitations shall be based upon a rolling, 12-month summation of the monthly emissions.

- h. The permittee shall comply with the following requirements during periods of startup and shutdown.

	Emissions Limitations During Startup and Shutdown (lbs/hr) ^a			
	Cold Startup	Hot Startup	Warm Startup	Shutdown
CO	526.0	436.0	496.0	159.0
NO_x	162.0	78.7	113.0	72.7
VOC	64.4	60.1	59.6	67.9
^a Pound per hour emissions rates as presented are the maximum rates during any hour during the event from each unit *The emissions data presented does not imply that all start-up events will be completed in one hour.				

“Cold Startup” is defined as a combustion turbine startup that occurs more than 64 hours after a combustion turbine shutdown. The period of startup is defined as the lesser of the first 180 minutes of continuous fuel flow to the combustion turbine after fuel flow is initiated or the period of time from combustion turbine fuel flow initiation until the combustion turbine achieves ten consecutive CEM data points in compliance with the ppmvd emissions limitations for CO and NO_x.

“Hot Startup” is defined as a combustion turbine startup that occurs within 16 hours of a combustion turbine shutdown. The period of hot startup is defined as the lesser of the first 82 minutes of continuous fuel flow to the combustion turbine after fuel flow is initiated or the period of time from combustion turbine fuel flow initiation until the combustion turbine achieves ten consecutive CEM data points in compliance with the ppmvd emissions limitations for CO and NO_x.



“Warm Startup” is defined as a combustion turbine startup that occurs between 16 hours of and 64 hours of a combustion turbine shutdown. The period of startup is defined as the lesser of the first 98 minutes of continuous fuel flow to the combustion turbine after fuel flow is initiated or the period of time from combustion turbine fuel flow initiation until the combustion turbine achieves ten consecutive CEM data points in compliance with the ppmvd emissions limitations for CO and NO_x.

“Shutdown” is the continuous process of taking the turbine off-line. The shutdown period begins with the first CEM data point out of compliance with either the CO or NO_x ppmvd emission limit that occurs when load is dropping in conjunction with the process of ceasing operation of the unit, and ends when fuel flow to the turbine ceases.

- i. The emission limitation specified by this rule is less stringent than the limitation established by OAC rule 3745-31-10 through 20.
- j. This EU is exempt from the requirements of this rule, since only NG is burned.
- k. 40 CFR Part 60, Subpart A provides applicability provisions, definitions, and other general provisions that are pertinent to EUs affected by 40 CFR Part 60.
- l. This EU is subject to the applicable provisions of Subparts KKKK and TTTT of the 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 OEPA. The requirements of 40 CFR Part 60 are also federally enforceable.
- m. The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart KKKK, including the following sections:

60.4333	General Compliance Requirements
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- n. The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart TTTT, including the following sections:

60.5525	General Compliance Requirements
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- o. This EU is not subject to the requirements of 40 CFR Part 63, Subpart YYYY, since it is not located at a major source of HAP emissions.
- p. Each continuous NO_x monitoring system shall be certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2. At least 45 days before commencing certification testing of the continuous NO_x monitoring system(s), the permittee shall develop and maintain a written quality assurance/quality control plan designed to ensure continuous valid and representative readings of NO_x emissions from the continuous monitor(s), in units of the applicable standard(s). Except as allowed below, the plan shall follow the requirements of 40 CFR Part 60, Appendix F and 40 CFR Part 75, Appendix B. The quality assurance/quality control plan and a logbook



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

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

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

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

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

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

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



- (1) The permittee shall only burn pipeline quality NG as fuel in this EU.

[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0127662]

- (2) The permittee shall comply with the applicable operational restrictions required under 40 CFR Part 60, Subpart KKKK, including the following sections:

60.4333(a)	Operate and maintain the stationary combustion turbine, air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.
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[Authority for term: OAC rule 3745-77-07(A)(1) and PTI P0127662]

d) Monitoring and/or Recordkeeping Requirements

- (1) For each day during which the permittee burns a fuel other than NG, the permittee shall maintain a record of the type and quantity of fuel burned in this EU.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (2) The permittee shall perform monthly checks, when the EU is in operation and when the weather conditions allow, for any visible PE from the stack serving this EU. The presence or absence of any VEs shall be noted in an operations log. If VEs are observed, the permittee shall also note the following in the operations log:

- the color of the emissions;
- whether the emissions are representative of normal operations;
- if the emissions are not representative of normal operations, the cause of the abnormal emissions;
- the total duration of any VE incident; and
- any corrective actions taken to minimize or eliminate the VE.

If VEs are present, a VE incident has occurred. The observer does not have to document the exact start and end times for the VE incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the VE incident was continuous during the observation period (or, if known, continuous during the operation of the EU). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the VEs were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the EU continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal VEs.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (3) For purposes of demonstrating compliance with the NG sulfur concentration restriction of 0.5 grain/100 scf, the permittee shall sample and analyze the NG burned in this EU monthly to determine the sulfur content using the appropriate ASTM or Gas Processors Association



standards. Fuel supplier data may be used to comply with this requirement, provided that it is demonstrated to be representative of the fuel received for burning at this EU.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (4) The permittee may elect not to monitor the total sulfur content of the fuel combusted in the turbine as specified in 40 CFR 60.4360, if the fuel is demonstrated not to exceed potential sulfur emissions of 1.5E-03 lb SO₂/MMBtu. The permittee shall use one of the following sources of information to make the required demonstration:

- a. the fuel quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the fuel, specifying that the maximum total sulfur content for NG is 0.5 grain of sulfur or less per 100 standard cubic feet, has potential sulfur emissions of less than 1.5E-03 lb SO₂/MMBtu heat input;
- b. representative fuel sampling data which show that the sulfur content of the fuel does not exceed 1.5E-03 lb SO₂/MMBtu heat input. At a minimum, the amount of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of Appendix D to Part 75 of this chapter is required; or
- c. one of the custom sulfur monitoring schedules outlined in 40 CFR 60.4370(c) may be used to comply with the 1.5E-03 lb SO₂/MMBtu standard.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (5) The permittee shall maintain monthly records of the following information:

- a. the CO, NO_x, PM₁₀/PM_{2.5}, SO₂, VOC and H₂SO₄ emission rate for each month of operations; and
- b. beginning after the first 12 calendar months of operation following the initial emissions compliance testing and CEMS certification, the rolling, 12-month summation of the CO, NO_x, PM₁₀/PM_{2.5}, SO₂, VOC and H₂SO₄ emissions.

Also, during the first 12 calendar months of operation following the initial emissions compliance testing and CEMS certification, the permittee shall record the cumulative CO, NO_x, PM₁₀/PM_{2.5}, SO₂, VOC and H₂SO₄ emissions for each calendar month.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (6) The permittee shall maintain monthly records of the following information for this EU for purposes of calculating rolling, 12-month emissions:

- a. date, time, and duration of each cold, warm, hot startup and shutdown period;
- b. the hours of operation of the combustion turbine;
- c. the hours of operation of the duct burner;
- d. the total duration of all cold startup periods in hours per rolling, 12-month period;
- e. the total duration of all hot startup periods in hours per rolling, 12-month period;
- f. the total duration of all warm startup periods in hours per rolling, 12-month period;



- g. the total duration of all shutdown periods in hours per rolling, 12-month period;
- h. the total duration of steady-state operation without duct burner firing in hours per rolling, 12-month period; and
- i. the total duration of steady-state operation with duct burner firing in hours per rolling, 12-month period.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (7) 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 2. The OEPA, Central Office shall approve the proposed sampling site and certify that the continuous NO_x monitoring system meets the requirements of Performance Specifications 2; and the U.S. EPA shall certify that the continuous NO_x monitoring system meets the requirements under 40 CFR Part 75, which may be approved through the recommendation for certification by OEPA to U.S. EPA. Once received, the letter(s)/document(s) of certification under Part 60 and certification or recommendation for certification under Part 75 shall be maintained on site and made available to the Director (the OEPA Northeast District Office (NEDO)) upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (8) The permittee shall install, operate, and maintain equipment to continuously monitor and record NO_x emissions from this EU in units of the applicable standard(s). The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60 and 40 CFR Part 75.

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

- a. emissions of NO_x in ppm for each cycle time of the analyzer, with no resolution less than one data point per minute required;
- b. emissions of NO_x in pounds per hour and in units of the applicable standard(s) in the appropriate averaging period;
- c. results of quarterly cylinder gas audits or linearity checks;
- d. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- e. results of required RATA(s), including results in units of the applicable standard(s);
- f. hours of operation of the EU, continuous NO_x monitoring system, and control equipment;
- g. the date, time, and hours of operation of the EU without the control equipment and/or the continuous NO_x monitoring system;
- h. malfunction of the control equipment and/or the continuous NO_x monitoring system; and



- i. the reason (if known) and the corrective actions taken (if any) for each such event in (g) and (h).

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (9) Prior to the installation of the continuous CO monitoring system, the permittee shall submit information detailing the proposed location of the sampling site in accordance with the siting requirements in 40 CFR Part 60, Appendix B, Performance Specification 4 or 4a (as appropriate). The OEPA, Central Office shall approve the proposed sampling site and certify that the continuous CO monitoring system meets the requirements of Performance Specifications 4 or 4a and 6. Once received, the letter(s)/document(s) of certification shall be maintained on-site and shall be made available to the Director (the OEPA NEDO) upon request.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

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

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

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



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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (11) The permittee shall calculate and record the monthly CO₂ emissions from P001 and P002 using data from the continuous fuel flow monitor using the procedures set forth in 40 CFR Part 75, Appendix G. From this data, the permittee shall calculate the CO₂ emissions from P001 and P002 per rolling, 12-month period.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

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

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

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



- d. The following summarizes the results of dispersion modeling for the “worst case” toxic contaminant(s):

Toxic Contaminant: H_2SO_4

TLV (mg/m³): 0.2 mg/m³

Hourly Emission Rate for Maximum Hourly Impact (lbs/hr): 3.6

Predicted 1-Hour Maximum Ground Level Concentration (μg/m³): 1.08

MAGLC (μg/m³): 4.76

The permittee has demonstrated that emissions of H_2SO_4 , from EU(s) P001 and P002, is calculated to be less than eighty percent of the MAGLC; any new raw material or processing agent shall not be applied without evaluating each component toxic air contaminant in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

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

If the permittee determines that the “Toxic Air Contaminant Statute” will be satisfied for the above changes, the OEPA will not consider the change(s) to be a “modification” under OAC rule 3745 31 01 solely due to a non-restrictive change to a parameter or process operation, where compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), has been documented. If the change(s) meet(s) the definition of a “modification”, the permittee shall apply for and obtain a final PTI prior to the change. The Director may consider any significant departure from the operations of the EU, described in the permit application, as a modification that results in greater emissions than the emissions rate modeled to determine the ground level concentration; and he/she may require the permittee to submit a permit application for the increased emissions.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]



- (14) The permittee shall collect, record, and retain the following information for each toxic evaluation conducted to determine compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F):
- a description of the parameters/values used in each compliance demonstration and the parameters or values changed for any re-evaluation of the toxic(s) modeled (the composition of materials, new toxic contaminants emitted, change in stack/exhaust parameters, etc.);
 - the MAGLC for each significant toxic contaminant or worst-case contaminant, calculated in accordance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F);
 - a copy of the computer model run(s), that established the predicted 1-hour maximum ground level concentration that demonstrated the EU(s) to be in compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), initially and for each change that requires re-evaluation of the toxic air contaminant; and
 - the documentation of the initial evaluation of compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), and documentation of any determination that was conducted to re-evaluate compliance due to a change made to the EU(s) or the materials applied.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (15) The permittee shall maintain a record of any change made to a parameter or value used in the dispersion model, used to demonstrate compliance with the “Toxic Air Contaminant Statute”, ORC 3704.03(F), through the predicted 1-hour maximum ground level concentration. The record shall include the date and reason(s) for the change and if the change would increase the ground-level concentration.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (16) The permittee shall comply with the applicable monitoring and/or recordkeeping required under 40 CFR Part 60, Subpart KKKK, including the following sections:

60.4340(b)(1)	Continuous emission monitoring as described in §§ 60.4335(b) and 60.4345
60.4345(a) through (e)	Requirements for continuous emission monitoring system equipment using a NOx CEMS
60.4350(a) through (f) and (h)	Using data from the CEM equipment to identify excess emissions
60.4360	Determining the total sulfur content of the turbine’s combustion fuel
60.4365(a) or (b)	Exemption from monitoring the total sulfur content of the fuel

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]



- (17) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart TTTT, including the following sections:

60.5535	Monitor and Collect Data to Demonstrate Compliance
60.5540	Demonstrate Compliance with CO ₂ Emissions and Determine Excess Emissions
60.5550	Notification Requirements
60.5560 and 60.5565	Record Keeping Requirements

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

e) Reporting Requirements

- (1) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than NG was burned in this EU. Each report shall be submitted within 30 days after the deviation occurs.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (2) Pursuant to 40 CFR Part 60.7 and 60.48c(a), the permittee is hereby advised of the requirement to report the following at the appropriate times:
- construction date (no later than 30 days after such date);
 - actual start-up date (within 15 days after such date); and
 - the design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (3) The permittee shall submit quarterly deviations(excursion) reports that identify the following:
- any monthly record showing an exceedance of the allowable sulfur content of NG, 0.5 grain per 100 standard cubic feet.

The quarterly deviation (excursion) reports shall be submitted in accordance with the reporting requirements of the Standard Ts & Cs of this permit.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (4) The permittee shall comply with the applicable restrictions required under 40 CFR Part 60, Subpart TTTT, including the following sections:

60.5550	Submittal of notifications
60.5555	Required Reports

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]



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



- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

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

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (6) The permittee shall comply with the following quarterly reporting requirements for the EU and its continuous CO monitoring system:
 - a. Pursuant to the monitoring, record keeping, and reporting requirements for continuous monitoring systems contained in 40 CFR 60.7 and 60.13(h) and the requirements established in this permit, the permittee shall submit reports within 30 days following the end of each calendar quarter to the OEPA NEDO, documenting all instances of CO emissions in excess of any applicable limit specified in this permit, 40 CFR Part 60, OAC Chapter 3745-21, and any other applicable rules or regulations. The report shall document the date, commencement and completion times, duration, and magnitude of each exceedance, as well as, the reason (if known) and the corrective actions taken (if any) for each exceedance. Excess emissions shall be reported in units of the applicable standard(s).
 - b. These quarterly reports shall be submitted by January 30, April 30, July 30, and October 30 of each year and shall include the following:
 - i. the facility name and address;
 - ii. the manufacturer and model number of the continuous CO and other associated monitors;
 - iii. a description of any change in the equipment that comprises the CEMS, including any change to the hardware, changes to the software that may affect CEMS readings, and/or changes in the location of the CEMS sample probe;
 - iv. the excess emissions report (EER)*, i.e., a summary of any exceedances during the calendar quarter, as specified above;
 - v. the total CO emissions for the calendar quarter (tons);
 - vi. the total operating time (hours) of the EU;
 - vii. the total operating time of the continuous CO monitoring system while the EU was in operation;



- viii. results and dates of quarterly cylinder gas audits;
- ix. unless previously submitted, results and dates of the RATA(s), including results in units of the applicable standard(s), (during appropriate quarter(s));
- x. unless previously submitted, the results of any RATA showing the continuous CO monitor out-of-control and the compliant results following any corrective actions;
- xi. the date, time, and duration of any/each malfunction** of the continuous CO monitoring system, EU, and/or control equipment;
- xii. the date, time, and duration of any downtime** of the continuous CO monitoring system and/or control equipment while the EU was in operation; and
- xiii. the reason (if known) and the corrective actions taken (if any) for each event in (b)(xi) and (xii).

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

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (7) The permittee shall collect, record and maintain measurements, data, records and reports required per 40 CFR Part 75; and shall submit certification, recertification, notifications, applications, monitoring plans, petitions for alternative monitoring systems, electronic quarterly reports and any other pertinent record and/or report to the Administrator (U.S. EPA), as required by this Part.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

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



- e. a statement that the model results indicate that the 1-hour maximum ground-level concentration is less than 80% of the MAGLC.

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (9) The permittee shall comply with the applicable reporting required under 40 CFR Part 60, Subpart KKKK, including the following sections:

60.4375(a)	each affected unit required to continuously monitor parameters or emissions, or to periodically determine the fuel sulfur content under this subpart; submit reports of excess emissions and monitor downtime, in accordance with § 60.7(c) . Excess emissions must be reported for all periods of unit operation, including start-up, shutdown, and malfunction.
60.4380(b)	excess emissions and monitor downtime reporting for turbines using continuous emission monitoring
60.4395	All reports required under § 60.7(c) must be postmarked by the 30th day following the end of each 6-month period.* *This reporting requirement is satisfied through the quarterly air report submitted in accordance with C.3.e)(5).

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

f) Testing Requirements

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

a. Emissions Limitation:

Visible PE from the stack serving this EU shall not exceed 10% opacity as a 6-minute average.

Applicable Compliance Method:

If required, the permittee shall demonstrate compliance based upon an emission test performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9. Alternative U.S. EPA-approved test methods may be used with prior approval from the OEPA.

b. Emission Limitation:

CO emissions from this EU shall not exceed 2.0 ppmvd at 15% oxygen as an hourly average and 14.6 lbs/hr when firing NG and the duct burner is not in operation; 2.0 ppmvd at 15% oxygen as an hourly average and 15.5 lbs/hr when firing NG and the duct burner is in operation.



Applicable Compliance Method:

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

The permittee shall demonstrate compliance using Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the OEPA. See f)(2).

c. Emission Limitation:

CO emissions from this EU shall not exceed 526.0 lbs/hr during cold startup, 436.0 lbs/hr during hot startup, 496.0 lbs/hr during warm startup and 150.0 lbs/hr during shutdown.

Applicable Compliance Method:

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

d. Emission Limitation:

CO emissions from this EU shall not exceed 135.2 tons per rolling, 12-month period.

Applicable Compliance Method:

This emissions limitation is based on the following anticipated worst case emissions: 250 hot startups per year, with zero hours of downtime, and a hot startup duration of 82 minutes; shutdown duration of 25 minutes; maximum combined CO emissions of 436 pounds during each hot startup period and 150 pounds during each shutdown period; hourly CO emissions during steady state operation (Siemens Case #7; ISO Conditions) of 14.9 lbs/hr based on manufacturer's data; and steady state operating hours was determined by the following equation.

$$8,760 \text{ hrs} - \left(250 \left(\frac{(82+25) \text{ min}}{60 \left(\frac{\text{min}}{\text{hr}} \right)} \right) \right) = 8,314.2 \text{ hours}$$

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

$$\frac{\left[\left(250 \frac{\text{HS}}{\text{yr}} \right) \left(436 \frac{\text{lbs}}{\text{HS}} + 150 \frac{\text{lbs}}{\text{SD}} \right) + \left(8,314.2 \frac{\text{hrs}}{\text{yr}} \right) \left(14.9 \frac{\text{lbs}}{\text{hr}} \right) \right]}{2000 \frac{\text{lbs}}{\text{ton}}} = 135.2 \text{ tons/yr}$$

where:

HS = hot starts; and

SD= shut down



Compliance shall be based upon record keeping as specified in d)(5) and shall be demonstrated through the use of CEMs as specified in d)(10).

The monthly CO emissions shall be added to the total CO emissions from the previous eleven months to determine the rolling, 12-month summation of CO emissions.

e. Emission Limitation:

NO_x emissions from this EU shall not exceed 2.0 ppmvd at 15% oxygen as an hourly average and 23.8 lbs/hr when the duct burner is not in operation; and NO_x emissions shall not exceed 2.0 ppmvd at 15% oxygen as an hourly average and 25.3 lbs/hr when the duct burner is in operation.

Applicable Compliance Method:

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

The permittee shall demonstrate compliance using Methods 1 through 4 and 7E of 40 CFR Part 60, Appendix A, and the procedures specified in 40 CFR 60.4400. Alternative U.S. EPA-approved test methods may be used with prior approval from the OEPA. See f)(2).

f. Emission Limitation:

NO_x emissions from this EU shall not exceed 162.0 lbs/hr during cold startup, 78.7 lbs/hr during hot startup, 113.0 lbs/hr during warm startup and 57.3 lbs/hr during shutdown.

Applicable Compliance Method:

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

g. Emission Limitation:

NO_x emissions from this EU shall not exceed 117.6 tons per rolling, 12-month period.

Applicable Compliance Method:

This emissions limitation is based on the following anticipated worst case emissions: 250 hot startups per year, with zero hours of downtime, and a hot startup duration of 82 minutes; shutdown duration of 25 minutes; maximum combined NO_x emissions of 78.7 pounds during each hot startup period and 57.3 pounds during each shutdown period; hourly NO_x emissions during steady state operation (Siemens Case #7; ISO



Conditions) of 24.2 lbs/hr based on manufacturer's data; and steady state operating hours was determined by the following equation.

$$8,760 \text{ hrs} - \left(250 \left(\frac{(82+25) \text{ min}}{60 \left(\frac{\text{min}}{\text{hr}} \right)} \right) \right) = 8,314.2 \text{ hours}$$

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

$$\frac{\left[\left(250 \frac{\text{HS}}{\text{yr}} \right) \left(78.7 \frac{\text{lbs}}{\text{HS}} + 57.3 \frac{\text{lbs}}{\text{SD}} \right) + \left(8,314.2 \frac{\text{hrs}}{\text{yr}} \right) \left(24.2 \frac{\text{lbs}}{\text{hr}} \right) \right]}{2000 \frac{\text{lbs}}{\text{ton}}} = 117.6 \text{ tons/yr}$$

where:

HS = hot starts; and

SD= shut down

Compliance shall be based upon record keeping as specified in d)(5) and shall be demonstrated through the use of CEMs as specified in d)(8).

The monthly NO_x emissions shall be added to the total NO_x emissions from the previous eleven months to determine the rolling, 12-month summation of NO_x emissions.

h. Emission Limitation:

VOC emissions shall not exceed 1.0 ppmvd at 15% oxygen as an hourly average and 4.1 lbs/hr when the duct burner is not in operation; and VOC emissions shall not exceed 2.0 ppmvd at 15% oxygen as an hourly average and 8.8 lbs/hr when the duct burner is in operation.

Applicable Compliance Method:

These emission limitations are based on manufacturer's data. The permittee shall demonstrate compliance with this emission limitation through emission testing performed in accordance with Methods 1 through 4 and 18, 25 or 25A, as appropriate, of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA-approved test methods may be used with prior approval from OEPA. See f)(2).

i. Emission Limitation:

VOC emissions from this EU shall not exceed 64.4 lbs/hr during cold startup, 60.1 lbs/hr during hot startup, 59.6 lbs/hr during warm startup and 62.8 lbs/hr during shutdown.

Applicable Compliance Method:

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



of 40 CFR Part 60, Appendix A. Use of Method 18, 25 or 25A is to be selected based on the results of pre-survey stack sampling and U.S. EPA guidance documents. Alternative U.S. EPA-approved test methods may be used with prior approval from OEPA.

j. Emission Limitation:

VOC emissions shall not exceed 50.3 tons per rolling, 12-month period.

Applicable Compliance Method:

This emission limitation is based on the following anticipated worst case emissions: 250 hot startups per year, with zero hours of downtime, and a hot startup duration of 82 minutes; shutdown duration of 25 minutes; maximum combined VOC emissions of 60.1 pounds during each hot startup period and 62.8 pounds during each shutdown period; hourly VOC emissions during steady state operation of 8.4 lbs/hr based on manufacturer's data; and steady state operating hours was determined by the following equation.

$$8,760 \text{ hrs} - \left(250 \left(\frac{(82+25) \text{ min}}{60 \left(\frac{\text{min}}{\text{hr}} \right)} \right) \right) = 8,314.2 \text{ hours}$$

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

$$\frac{\left[\left(250 \frac{\text{HS}}{\text{yr}} \right) \left(60.1 \frac{\text{lbs}}{\text{HS}} + 62.8 \frac{\text{lbs}}{\text{SD}} \right) + \left(8,314.2 \frac{\text{hrs}}{\text{yr}} \right) \left(8.4 \frac{\text{lbs}}{\text{hr}} \right) \right]}{2000 \frac{\text{lbs}}{\text{ton}}} = 50.28 \text{ tons/yr}$$

where:

HS = hot starts; and

SD= shut down

Compliance shall be based upon record keeping as specified in d)(5) and shall be demonstrated through a summation of the VOC emissions as follows:

- i. The VOC emissions for each EU shall be determined by multiplying the operating hours for the month, by the average emission rate (lbs VOC/hour) derived from the emission tests conducted in accordance with Section f)(2), and dividing by 2,000 lbs/ton.
- ii. The monthly VOC emissions shall be added to the total VOC emissions from the previous 11 months to determine the rolling, 12-month summation of VOC emissions, using the operating hour data from d)(5) and the average emission rates derived from the emission tests conducted in accordance with f)(2).

k. Emission Limitation:

SO₂ emissions from this EU shall not exceed 1.5E-03 lb/MMBtu and 4.8 lbs/hr when the duct burner is not in operation; 1.5E-03 lb/MMBtu and 5.1 lbs/hr when duct burner is in operation.

Applicable Compliance Method:



For pipeline quality NG having a maximum sulfur content of 0.5 grain per 100 standard cubic feet according to the following calculation: multiply the maximum sulfur content of NG (0.5 grain S/100 scf) by the molecular weight of SO₂ (64.07 lbs SO₂/lb-mole), divide by the molecular weight of sulfur (32.06 lbs S/lb-mole), divide by (7,000 grains/lb), divide by the expected heating value (HHV) for pipeline NG (1,028 Btu/scf), and multiply by (10⁶ Btu/MMBtu).

Compliance with the lb/hr emission limitation shall be based upon multiplying 1.5E-03 lb/MMBtu by the maximum heat input capacity (with and without the use of the duct burner) of this EU.

l. Emission Limitation:

SO₂ emissions from this EU shall not exceed 21.0 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in d)(5) and shall be demonstrated through a summation of the SO₂ emissions fuel as follows:

The monthly SO₂ emissions for each EU shall be determined by multiplying 1.5E-03 lb SO₂/MMBtu by the actual heat input for these EUs (MMBtu/month) and then dividing by 2,000 lbs/ton. The monthly SO₂ emissions shall be added to the total SO₂ emissions from the previous eleven months to determine the rolling, 12-month summation of SO₂ emissions.

m. Emission Limitation:

PM₁₀ and PM_{2.5} emissions from this EU shall not exceed 6.0 E-03 lb/MMBtu as an hourly average and 12.9 lbs/hr when the duct burner is not in operation; 4.6E-03 lb/MMBtu as an hourly average and 15.2 lbs/hr when the duct burner is in operation.

Applicable Compliance Method:

These emission limitations are based on manufacturer's data. The permittee shall demonstrate compliance with these emission limitations using Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M. Alternative U.S. EPA-approved test methods may be used with prior approval from the OEPA. See f)(2).

n. Emission Limitation:

PM₁₀ and PM_{2.5} emissions from this EU shall not exceed 64.4 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in d)(5) and shall be demonstrated through a summation of the PM₁₀ and PM_{2.5} emissions as follows:

- i. The PM₁₀ and PM_{2.5} emissions for each EU from the burning of NG shall be determined by multiplying the total fuel use (MMBtu) for the month, by the average emission rate (lbs PM₁₀ and PM_{2.5}/MMBtu) derived from the emission tests conducted in accordance with f)(2), and dividing by 2,000 lbs/ton.



- ii. The monthly PM₁₀ and PM_{2.5} emissions shall be added to the total PM₁₀ and PM_{2.5} emissions from the previous 11 months to determine the rolling, 12-month summation of PM₁₀ and PM_{2.5} emissions, using the total fuel use (MMBtu) data from the Part 75 certified fuel flow meters and the average emission rates derived from the emission tests conducted in accordance with f)(2).
- o. Emission Limitation:

H₂SO₄ emissions from this EU shall not exceed 1.1E-03 lb/MMBtu as an hourly average and 3.5 lbs/hr when the duct burner is not in operation; 1.1E-03 lb/MMBtu as an hourly average and 3.7 lbs/hr when the duct burner is in operation.

Applicable Compliance Method:

These emission limitations are based on manufacturer's data. The permittee shall demonstrate compliance using Methods 1 through 4 and 8 of 40 CFR Part 60, Appendix A. Alternative U.S. EPA-approved test methods may be used with prior approval from the OEPA. See f)(2).
- p. Emission Limitation:

H₂SO₄ emissions from this EU shall not exceed 15.8 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be based upon record keeping as specified in d)(5) and shall be determined through a summation of the H₂SO₄ emissions as follows:

 - i. The H₂SO₄ emissions for each EU shall be determined by multiplying the fuel use in MMBtu for the month, by the average emission rate (lbs H₂SO₄/MMBtu) derived from the emission tests conducted in accordance with f)(2), and dividing by 2,000 lbs/ton.
 - ii. The monthly H₂SO₄ emissions shall be added to the total H₂SO₄ emissions from the previous 11 months to determine the rolling, 12-month summation of H₂SO₄ emissions, using the fuel use data from the Part 75 certified fuel flow meters and the average emission rates derived from the emission tests conducted in accordance with f)(2).
- q. Emission Limitation:

CO₂e emissions shall not exceed 833 lbs/MW-hr gross energy output (at full load ISO Conditions without duct firing).

CO₂e emissions shall not exceed 884 lbs/ MW-hr gross energy output (maximum under any condition with duct firing).

CO₂e emissions shall not exceed 401,084 lbs/hr (maximum under any condition with duct firing).

CO₂e emissions shall not exceed 1,683,213 tons per rolling, 12-month period during all operating modes, including startup and shutdown periods.



Applicable Compliance Method:

Since more than 99% of the CO₂e emissions result from CO₂ emissions, compliance with the 884 lbs/MW-hr gross energy output (maximum under any condition with duct firing) for CO₂e emissions will be demonstrated if the CO₂ emissions during testing, conducted per f)(2), are determined to not exceed 884 lbs/MW-hr gross energy output.

Compliance with the maximum hourly emission limitation is based on the following calculation:

NG (Manufacturer's data Siemens Case #17):

$$\text{CO}_2: (3,371.1 \text{ MMBtu/hr})(118.857 \text{ lb/MMBtu}^a) = 400,677 \text{ lbs/hr}$$

$$\text{CH}_4: (3,371.1 \text{ MMBtu/hr})(2.2\text{E-}03 \text{ lb/MMBtu}^b) = 7.4 \text{ lbs/hr}$$

$$\text{N}_2\text{O}: (3,371.1 \text{ MMBtu/hr})(2.2\text{E-}04 \text{ lb/MMBtu}^c) = 0.74 \text{ lb/hr}$$

where:

“a” is the emission factor from USEPA 40 CFR Part 75;

“b” is the emission factor from USEPA 40 CFR Part 98; and

“c” is the emission factor from USEPA 40 CFR Part 98.

The hourly emission limitation is based on the sum of the following manufacturer's data Siemens Case #17 (400,677 lbs/hr CO₂, 7.4 lbs/hr CH₄, and 0.74 lbs/hr N₂O) multiplied by the associated global warming potential for each pollutant (CO₂=1, CH₄=25, N₂O=298 from Table A-1 of 40 CFR 98).

$$\left[\left(400,677 \frac{\text{lbs}}{\text{hr}} \right) (1) + \left(7.4 \frac{\text{lbs}}{\text{hr}} \right) (25) + \left(0.740 \frac{\text{lbs}}{\text{hr}} \right) (298) \right] = 401,084 \text{ lbs/hr}$$

The annual emission limitation was developed by multiplying the steady-state CO₂e emissions at 50°F (384,295 lbs/hr) by the maximum annual hours of operation (8,760 hours), and then dividing by 2,000 pounds per ton.

r. Emission Limitation:

CO₂ emissions shall not exceed 450 kg per MW-hr of gross energy output (1,000 lb/MW-hr of CO₂) or

CO₂ emissions shall not exceed 470 kg per MW-hr of net energy output (1,030 lb/MW-hr of CO₂).

Applicable Compliance Method:

Compliance with the above emissions limitations shall be determined in accordance with the following:

60.5540	Demonstrating Compliance with the CO ₂ Emissions Standard
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[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]



- (2) The permittee shall conduct, or have conducted, emission testing for this EU in accordance with the following requirements:
- a. Compliance testing for NO_x emissions shall be conducted in accordance with the following:
 - i. Emission testing for each operating scenario shall be conducted once every 5 years for each operating scenario (i.e., with and without the duct burner).
 - ii. The emission testing shall be conducted to demonstrate compliance with the NO_x lbs/hr and ppmvd emission limitations under both duct burner operating scenarios (i.e., with and without the duct burner operating).
 - iii. In lieu of three, one-hour test runs, the emissions testing requirement may be satisfied using Reference Method test data collected during a CEMS RATA conducted in accordance with 40 CFR, Part 75, Appendix A. The average of the Reference Method data from three consecutive RATA test runs, each of at least 60 minutes, shall be considered three, one-hour test runs for the purpose of the emissions test and RATA test requirements. A minimum of an additional six, 21-minute test runs must be used to satisfy the RATA test requirements. Emission testing for CO shall be conducted at the discretion of the Director pursuant to Ohio EPA Engineering Guide #16. The most recent test (initial) which demonstrated compliance with the CO permit limits was performed on November 24, 2025, through November 26, 2025.

Ongoing compliance with the CO emissions limitations and O₂ monitoring requirements contained in this permit, 40 CFR Parts 60 and 75, and any other applicable standard(s), shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit; and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Parts 60 and 75.
 - b. Emission testing for PM₁₀ and PM_{2.5}, VOC and H₂SO₄, shall be conducted at the discretion of the Director pursuant to Ohio EPA Engineering Guide #16. The most recent test (initial) which demonstrated compliance with the PM₁₀ and PM_{2.5}, VOC, and H₂SO₄ permit limits was performed November 24, 2025, through November 26, 2025.
 - c. The emission testing shall be conducted to demonstrate compliance with the allowable mass emission rate(s) for CO, NO_x, SO₂, PM₁₀, PM_{2.5}, VOC and H₂SO₄, in the appropriate averaging period(s).

The emission testing shall also be conducted to determine a site-specific emission factor for CO₂, in lb/MMBtu and lb/MW-hr gross energy output.

The emission testing shall also be conducted to demonstrate formaldehyde emission factor accuracy.
 - d. The following test method(s) shall be employed to demonstrate compliance with the allowable mass emission rate(s):



for CO, Methods 1 through 4 and 10 of 40 CFR Part 60, Appendix A;

for NO_x, Methods 1 through 4 and 7E of 40 CFR Part 60, Appendix A, and the procedures specified in 40 CFR 60.4400;

for PM₁₀ and PM_{2.5}, Methods 201 or 201A and 202 of 40 CFR Part 51, Appendix M;

for SO₂, 40 CFR 60.4415;

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

for H₂SO₄, Methods 1 through 4 and 8 of 40 CFR Part 60, Appendix A; and

for CO₂, Methods 1, 2, 3A, and 4 of 40 CFR Part 60, Appendix A, mass balance calculations using ASTM D1945-03 (Standard Test Method for Analysis of Natural Gas by Gas Chromatography) and/or ASTM D1826-94 (Standard Test Method for Calorific Value of Gases in Natural Gas Range by Continuous Recording Calorimeter).

for formaldehyde, SW-846 Method 0011, Method 316 or Method 323.

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

- e. During the emission testing, the EU shall be operated under operational conditions approved in advance by the OEPA NEDO. Operational conditions that may need to be approved include, but are not limited to, the production rate, the type of material processed, material make-up (solvent content, etc.), or control equipment operational limitations (burner temperature, precipitator voltage, etc.). In general, testing shall be done under “worst case” conditions expected during the life of the permit. As part of the information provided in the “Intent to Test” notification form described below, the permittee shall provide a description of the EU operational conditions they will meet during the emissions testing and describe why they believe “worst case” operating conditions will be met. Prior to conducting the test(s), the permittee shall confirm with the OEPA NEDO that the proposed operating conditions constitute “worst case”. Failure to test under the approved conditions may result in OEPA not accepting the test results as a demonstration of compliance.
- f. Not later than 30 days prior to the proposed test date(s), the permittee shall submit an "Intent to Test" notification to the OEPA NEDO. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the EU 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 OEPA NEDO's refusal to accept the results of the emission test(s).
- g. Personnel from the OEPA NEDO 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 EU and the testing procedures provide a valid characterization of the emissions from the EU 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 OEPA NEDO 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 OEPA NEDO.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (3) Within 60 days of achieving the maximum production rate at which the EU(s) will be operated, but not later than 180 days after initial startup, the permittee shall conduct certification tests of the continuous NO_x emission monitoring system, in units of the applicable standard(s), to demonstrate compliance with 40 CFR Part 60, Appendix B, Performance Specification 2 relative accuracy requirements; ORC section 3704.03(I); and 40 CFR Part 75.

The permittee shall certify that the fuel flow monitor/meter meets 40 CFR Part 75 certification requirements prior to the performance specification test and shall demonstrate how the pound per hour emissions of NO_x will be calculated stoichiometrically from the fuel flow rate.

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

Certification, or recommendation for certification by OEPA to U.S. EPA, of the continuous NO_x monitoring system shall be granted upon determination by the OEPA, Central Office that the system meets the requirements of 40 CFR Part 60, Appendix B, Performance Specification 2 relative accuracy requirements; ORC section 3704.03(I); and 40 CFR Part 75.

Ongoing compliance with the NO_x emissions limitations contained in this permit, 40 CFR Parts 60 and 75, and any other applicable standard(s) shall be demonstrated through the data collected as required in the Monitoring and Record keeping Section of this permit and through demonstration of compliance with the quality assurance/quality control plan, which shall meet the testing and recertification requirements of 40 CFR Part 60 and 40 CFR Part 75.

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

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

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



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

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

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

[Authority for term: OAC rule 3745-77-07(C)(1) and PTI P0127662]

- (5) The permittee shall comply with the following testing requirements under 40 CFR Part 60, Subpart KKKK (40 CFR 60.4300 - 60.4420) including the following sections:

60.4405	Performance of initial performance test with NO _x diluent CEMS
60.4415	Conducting initial and subsequent sulfur performance tests

[Authority for term: OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) Initial emissions testing for VOC, SO₂, H₂SO₄, CO, NO_x, and PM₁₀/PM_{2.5} was conducted November 24, 2025, through November 26, 2025.