



Environmental
Protection Agency

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

Re: Ottawa County
Genoa Diesel Generating Station
Premise #: 0362000130
**Notice of Violation (NOV/non-
HPV)/Return to Compliance**

November 16, 2011

CERTIFIED MAIL

Mr. Randy Meyer, Director of Environmental Affairs
American Municipal Power, Inc. (AMP)
1111 Schrock Road
Suite 100
Columbus, Ohio 43229

Dear Mr. Meyer:

The purpose of this letter is to summarize the violation discovered during the inspection conducted on November 2, 2011, of the above referenced facility by this writer. Permit to Install (PTI) P0087404, issued January 28, 2010, contains a stack testing requirement for either P001 or P002, to demonstrate compliance with the nitrogen oxides (NOx) emission limit in the permit. Emissions unit P003 was tested on July 20, 2004, and showed compliance. The emission testing was to be conducted within six months after the issuance of this permit. The company failed to perform the required testing within the six month window. Based on my review during the inspection, it appears that AMP is fulfilling all of the other requirements of the permit.

On the day of the inspection, AMP conducted a stack test on emissions unit P002, (unit 2 diesel generator rated at 19.8 mmBTU/hr) which fulfilled the testing requirement. Therefore, the Ohio EPA considers this testing violation resolved. Please note, however, that this does not preclude the Director from seeking civil penalties pursuant to ORC section 3704.06 for the violation. The decision on whether to pursue or decline to pursue such penalties regarding this matter is dependent on several factors, one of which is the company's future compliance with applicable Ohio EPA requirements.

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I would like to thank you for the courtesy extended during my visit. Should you have any questions or comments concerning this letter, please feel free to contact me at (419) 373-3136.

Sincerely,



Jay Liebrecht
Division of Air Pollution Control

/lir

pc: Tom Kalman, Ohio EPA, DAPC-CO
Kevin Gladden, Village of Genoa
William MacDowell, U.S. EPA, Region V, Air and Radiation
DAPC-NWDO File
Certified Mail Receipt Number 7009 1410 0001 1834 0197

ec: Jennifer Jolliff, NWDO, DAPC