

John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Craig W. Butler, Director

3/25/2014

Certified Mail

Drew Parker  
DP&L, Monument Substation  
2101 Arbor Blvd.  
Dayton, OH 45439

Facility ID: 0857040926  
Permit Number: P0109268  
County: Montgomery

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

Dear Permit Holder:

Enclosed is the Ohio Environmental Protection Agency (EPA) Preliminary Proposed Title V permit that was issued in draft form on 1/28/2014. The comment period for the Draft permit has ended. We are now ready to submit this permit to U.S. EPA for approval.

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

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

and Regional Air Pollution Control Agency  
117 South Main Street  
Dayton, OH 45422-1280

If you believe that it is necessary to have an informal conference with us, then, as part of your written comments, you should request a conference concerning the written comments. If comments are not submitted within 14 days of your receipt of this letter, we will forward the proposed permit to U.S. EPA for approval. All comments received will be carefully considered before proceeding with the proposed permit.

Sincerely,

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

Cc: Regional Air Pollution Control Agency





## Response to Comments

Facility ID:	0857040926
Facility Name:	DP&L, Monument Substation
Facility Description:	Electric power Generation
Facility Address:	1131 East Monument Avenue Dayton, OH 45402-1356 Montgomery County
Permit:	P0109268, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the Dayton Daily News on 01/30/2014. The comment period ended on 03/01/2014.	
Hearing date (if held)	
Hearing Public Notice Date (if different from draft public notice)	

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

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

Comments from Mrs. Genevieve Damico, U.S.EPA Region V in a letter received February 27, 2014.

**1. Topic: Detailed Citation Approach of Engineering Guide 76**

a. Comment:

Most of the citations of the MACT rule do not follow the Detailed Citation Approach of Engineering Guide 76.

Response:

The terms and conditions were revised accordingly following the Detailed Citation Approach of Engineering Guide 76.

**2. Topic: Statement Of Basis (SOB)**

a. Comment:

For visible emissions, particulate emissions, and sulfur dioxide include a justification describing the emission factors and calculations and why these are sufficient to assure compliance or include monitoring in the permit.



**Response to Comments**  
DP&L, Monument Substation  
**Permit Number:** P0109268  
**Facility ID:** 0857040926

Response:

For opacity, the SOB was revised to explain that (for visible emissions) number 2 fuel oil is considered "inherently clean". The "inherently clean" VE terms were added to the permit.

For PE the permit was revised by including the calculation using AP-42 factor for compliance with the PE limit.

For SO<sub>2</sub>, the permit adequately explained that compliance is demonstrated with fuel oil sulfur content. No revision is necessary.



**PRELIMINARY PROPOSED**

**Division of Air Pollution Control  
Title V Permit  
for  
DP&L, Monument Substation**

Facility ID:	0857040926
Permit Number:	P0109268
Permit Type:	Renewal
Issued:	3/25/2014
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Title V Permit**  
for  
DP&L, Monument Substation

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**Preliminary Proposed Title V Permit**

DP&L, Monument Substation

**Permit Number:** P0109268

**Facility ID:** 0857040926

**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0857040926  
Facility Description: Electric power Generation  
Application Number(s): A0024189, A0043492  
Permit Number: P0109268  
Permit Description: Renewal of Title V operating permit for five (5) stationary internal combustion engines  
Permit Type: Renewal  
Issue Date: 3/25/2014  
Effective Date: To be entered upon final issuance  
Expiration Date: To be entered upon final issuance  
Superseded Permit Number: P0092742

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

DP&L, Monument Substation  
1131 East Monument Avenue  
Dayton, OH 45402-1356

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

Regional Air Pollution Control Agency  
117 South Main Street  
Dayton, OH 45422-1280  
(937)225-4435

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 Regional Air Pollution Control Agency. 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

Craig W. Butler  
Director



**Preliminary Proposed Title V Permit**  
DP&L, Monument Substation  
**Permit Number:** P0109268  
**Facility ID:** 0857040926  
**Effective Date:** To be entered upon final issuance

## **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.

*(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 maintenancerequests, 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 Regional Air Pollution Control Agency. 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.19, A.20, A.21, and A.23 of this Title V permit, as well as any deviations from the requirements in section C. Emissions Unit Terms and Conditions of this Title V permit, and any monitoring, record keeping, and reporting requirements, which are not reported in accordance with Standard Term and Condition A.2.c)(2) above shall be submitted to the Regional Air Pollution Control Agency by January 31 and July 31 of each year; and each report shall cover the previous six calendar months. Unless otherwise specified by rule, all other deviations from federally enforceable requirements identified in this permit shall be submitted annually as part of the annual compliance certification, including deviations of federally



enforceable requirements not specifically addressed by permit or rule for the insignificant activities or emissions levels (IEU) identified in section B. Facility-Wide Terms and Conditions of this Title V permit. Annual reporting of deviations is deemed adequate to meet the deviation reporting requirements for IEUs unless otherwise specified by permit or rule.

In identifying each deviation, the permittee shall specify the federally enforceable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation.

These semi-annual and annual written reports shall satisfy the reporting requirements of OAC rule 3745-77-07(A)(3)(c) for any deviations from the federally enforceable requirements contained in this permit that are not reported in accordance with Standard Term and Condition A.2.c)(2) above.

If no such deviations occurred during a six-month period, the permittee shall submit a semi-annual report which states that no such deviations occurred during that period.

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

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

- (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 Regional Air Pollution Control Agency unless otherwise specified.

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

### **3. Reporting of Any Exceedence 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(W) based on the permanent shutdown and removal of one or more emissions units identified in this permit; or
  - (2) the permittee no longer meets the definition of a "major source" as defined in OAC rule 3745-77-01(W) based on obtaining restrictions on the facility-wide potential(s) to emit that are federally enforceable or legally and practically enforceable ; or
  - (3) a combination of (1) and (2) above.

The permittee shall continue to comply with all applicable OAC Chapter 3745-31 requirements for all regulated air 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(W), OAC rule 3745-77-07(A)(3)(b)(ii), OAC rule 3745-77(A)(7))*

## **8. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78.

*(Authority for term: OAC rule 3745-77-07(A)(8))*

## **9. Marketable Permit Programs**

No revision of this permit is required under any approved economic incentive, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(9))*



## **10. Reasonably Anticipated Operating Scenarios**

The permittee is hereby authorized to make changes among operating scenarios authorized in this permit without notice to the Ohio EPA, but, contemporaneous with making a change from one operating scenario to another, the permittee must record in a log at the permitted facility the scenario under which the permittee is operating. The permit shield provided in these standard terms and conditions shall apply to all operating scenarios authorized in this permit.

*(Authority for term: OAC rule 3745-77-07(A)(10))*

## **11. Reopening for Cause**

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

- a) Additional applicable requirements under the Act become applicable to one or more emissions units covered by this permit, and this permit has a remaining term of three or more years. Such a reopening shall be completed not later than eighteen (18) months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to paragraph (E)(1) of OAC rule 3745-77-08.
- b) This permit is issued to an affected source under the acid rain program and additional requirements (including excess emissions requirements) become applicable. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit, and shall not require a reopening of this permit.
- c) The Director of the Ohio EPA or the Administrator of the U.S. EPA determines that the federally applicable requirements in this permit are based on a material mistake, or that inaccurate statements were made in establishing the emissions standards or other terms and conditions of this permit related to such federally applicable requirements.
- d) The Administrator of the U.S. EPA or the Director of the Ohio EPA determines that this permit must be revised or revoked to assure compliance with the applicable requirements.

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

## **12. Federal and State Enforceability**

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

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

## **13. Compliance Requirements**

- a) Any document (including reports) required to be submitted and required by a federally applicable requirement in this Title V permit shall include a certification by a Responsible



Official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

- b) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:
- (1) At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with paragraph (E) of OAC rule 3745-77-03.
  - (3) Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.
  - (4) As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.
- c) The permittee shall submit progress reports to the Regional Air Pollution Control Agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:
- (1) Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.
  - (2) An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- d) Compliance certifications concerning the terms and conditions contained in this permit that are federally enforceable emission limitations, standards, or work practices, shall be submitted to the Director (the Regional Air Pollution Control Agency) and the Administrator of the U.S. EPA in the following manner and with the following content:
- (1) Compliance certifications shall be submitted annually on a calendar year basis. The annual certification shall be submitted 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 [as defined in OAC rule 3745-77-01(JJ)], and does not result in an exceedance of the emissions allowed under this permit (whether expressed therein as a rate of emissions or in terms of total emissions), and the permittee provides the Administrator of the U.S. EPA and the Regional Air Pollution Control Agency with written notification within a minimum of seven days in advance of the proposed changes, unless the change is associated with, or in response to, emergency conditions. If less than seven days notice is provided because of a need to respond more quickly to such emergency conditions, the permittee shall provide notice to the Administrator of the U.S. EPA and the Regional Air Pollution Control Agency as soon as possible after learning of the need to make the change. The notification shall contain the items required under OAC rule 3745-77-07(H)(2)(d).

*(Authority for term: OAC rules 3745-77-07(H)(1) and (2))*



## **16. Emergencies**

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

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

## **17. Off-Permit Changes**

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

- a) The change does not result in conditions that violate any applicable requirements or that violate any existing federally enforceable permit term or condition.
- b) The permittee provides contemporaneous written notice of the change to the Director and the Administrator of the U.S. EPA, except that no such notice shall be required for changes that qualify as insignificant emissions levels or activities as defined in OAC rule 3745-77-01(U). Such written notice shall describe each such change, the date of such change, any change in emissions or pollutants emitted, and any federally applicable requirement that would apply as a result of the change.
- c) The change shall not qualify for the permit shield under OAC rule 3745-77-07(F).
- d) The permittee shall keep a record describing all changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
- e) The change is not subject to any applicable requirement under Title IV of the Act or is not a modification under any provision of Title I of the Act.

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

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

## **18. Compliance Method Requirements**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defenses otherwise available to the permittee, including but not limited to, any challenge to the Credible Evidence Rule (see 62 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(O)), rendering existing permit terms and conditions irrelevant, the permittee shall not be required, after the date of the certification and submission to Ohio EPA, to meet any Title V permit requirements applicable to that emissions unit, except for any residual requirements, such as the quarterly deviation reports, semi-annual deviation reports and annual compliance certification covering the period during which the emissions unit last operated. All records relating to the shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law.

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 Regional Air Pollution Control Agency.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (i) any deviations (excursions) from emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and record keeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Regional Air Pollution Control Agency. In identifying each deviation, the permittee shall specify the applicable requirement for which the deviation occurred, describe each deviation, and provide the magnitude and duration of each deviation. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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 Regional Air Pollution Control Agency in accordance with paragraph (B) of OAC rule 3745-15-06. Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emissions unit(s) that is (are) served by such control system(s).

**28. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The Regional Air Pollution Control Agency must be notified in writing of any transfer of this permit.

*(Authority for term: OAC rule 3745-77-01(C))*

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

If no emission limitation (or control requirement), operational restriction and/or control device parameter limitation deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted 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.



**Preliminary Proposed Title V Permit**

DP&L, Monument Substation

**Permit Number:** P0109268

**Facility ID:** 0857040926

**Effective Date:** To be entered upon final issuance

**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 Regional Air Pollution Control Agency, 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.



**Preliminary Proposed Title V Permit**  
DP&L, Monument Substation  
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## **B. Facility-Wide Terms and Conditions**



**Preliminary Proposed Title V Permit**

DP&L, Monument Substation

**Permit Number:** P0109268

**Facility ID:** 0857040926

**Effective Date:** To be entered upon final issuance

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. None.



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DP&L, Monument Substation  
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## **C. Emissions Unit Terms and Conditions**



1. Emissions Unit Group -Internal combustion engines: B001,B002,B003,B004,B005,

EU ID	Operations, Property and/or Equipment Description
B001	Stationary compression ignition (CI) internal combustion engine (ICE), large bore No. 2 fuel oil-fired electric generator (General Motors Model MP45B); greater than 600 brake horsepower (bHP); complying with 40 CFR 63, Subpart ZZZZ Table 2d #3; and installed before 6/12/06.
B002	Stationary compression ignition (CI) internal combustion engine (ICE), large bore No. 2 fuel oil-fired electric generator (General Motors Model MP45B); greater than 600 brake horsepower (bHP); complying with 40 CFR 63, Subpart ZZZZ Table 2d #3; and installed before 6/12/06.
B003	Stationary compression ignition (CI) internal combustion engine (ICE), large bore No. 2 fuel oil-fired electric generator (General Motors Model MP45B); greater than 600 brake horsepower (bHP); complying with 40 CFR 63, Subpart ZZZZ Table 2d #3; and installed before 6/12/06.
B004	Stationary compression ignition (CI) internal combustion engine (ICE), large bore No. 2 fuel oil-fired electric generator (General Motors Model MP45B); greater than 600 brake horsepower (bHP); complying with 40 CFR 63, Subpart ZZZZ Table 2d #3; and installed before 6/12/06.
B005	Stationary compression ignition (CI) internal combustion engine (ICE), large bore No. 2 fuel oil-fired electric generator (General Motors Model MP45B); greater than 600 brake horsepower (bHP); complying with 40 CFR 63, Subpart ZZZZ Table 2d #3; and installed before 6/12/06.

a) The following emissions unit terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:

(1) None.

b) Applicable Emissions Limitations and/or Control Requirements

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



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	<p>40 CFR Part 63 Subpart ZZZZ (40 CFR 63.6580 to 63.6675)</p> <p>In accordance with 40 CFR 63.6585, this emissions unit is a stationary internal combustion engine (ICE) subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Stationary Reciprocating Internal Combustion Engines.</p>	<p>The existing stationary compression ignition (CI) reciprocating internal combustion engine (RICE), located at an area source for hazardous air pollutants (HAPs), shall meet the requirements of 40 CFR Part 63, Subpart ZZZZ.</p>
b.	<p>40 CFR 63.6603(a) Table 2d #3 to Subpart ZZZZ</p>	<p>Emissions of carbon monoxide (CO) shall not exceed 23 ppmvd at 15% O<sub>2</sub> or emissions of CO shall be reduced by 70% or more.</p>
c.	<p>OAC rule 3745-110-03(F)(3)</p>	<p>Emissions of nitrogen oxides (NO<sub>x</sub>) shall not exceed 3.0 grams/HP-hr.</p>
d.	<p>OAC rule 3745-17-11(B)(5)(b)</p>	<p>Particulate emissions (PE) shall not exceed 0.062 lb/MMBtu of actual heat input from ICE greater than 600 horsepower (HP).</p>
e.	<p>OAC rule 3745-17-07(A)(1)</p>	<p>The visible Particulate Emissions (PE) from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.</p>
f.	<p>OAC rule 3745-18-06(G)</p>	<p>The Sulfur Dioxide (SO<sub>2</sub>) emissions shall not exceed 0.5 pound per MM Btu of actual heat input.</p>

(2) Additional Terms and Conditions

- a. The permittee shall control the emissions of carbon monoxide (CO) from the stationary RICE exhaust using an oxidation catalyst control device. The permittee shall either limit the concentration of CO to 23 ppmvd or less at 15% O<sub>2</sub> at the outlet of the control device or the average reduction of CO, calculated according to 40 CFR 63.6620(e), shall not be less than 70% of the uncontrolled CO emissions.

[40 CFR 63.6603], [40 CFR 63.6640(a)], and [Subpart ZZZZ Table 2d #3]



- b. The quality of the fuel oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable sulfur dioxide emission limitation specified in this permit.
- c. The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
Applicable Tables from Part 63, Subpart ZZZZ	Comply with: emission limit options in Table 2d #3; operating limitations in Table 2b #1; performance test frequency in Table 3 #4; performance test methods in Table 4 #1 or #3; initial compliance demonstration in Table 5 #1, #2, #5, or #6; continuous compliance monitoring requirements in Table 6 #3 or #10; reporting requirements/frequency in Table 7; and the general provision from Subpart A in Table 8.
40 CFR 63.6603(a)	Maintain compliance with the emission limitation in Table 2d #3 (limit CO to 23 ppmvd at 15% O <sub>2</sub> or reduce CO by 70%) and the operating limitations identified in Table 2b to Part 63 Subpart ZZZZ.
40 CFR 63.6603; 40 CFR 63.6612; 40 CFR 63.6620; and Subpart ZZZZ Tables 4 & 5	Conduct an initial performance test within 180 days following the compliance date, or by 11/3/13, using the appropriate test methods in Table 4; while continuously monitoring either CO and O <sub>2</sub> (or CO <sub>2</sub> ), using continuous emissions monitoring systems (CEMS), <b>or</b> the temperature at the inlet of the catalyst to the control device using a continuous parameter monitoring system (CPMS), as required in Table 5; <b>and</b> establish the operating parameter for the pressure drop across the catalyst.
40 CFR 63.6615; Subpart ZZZZ Table 3 #4; and Table 6 #3 or #10	By the compliance date, either install CEMS to continuously monitor CO at the inlet and outlet of the control device if demonstrating compliance with the control requirement or at the outlet if choosing to comply with the CO concentration limit and conduct annual relative accuracy test audits (RATA) and daily data quality checks according to Table 6 #3 and measure the pressure drop across the catalyst monthly; <b>or</b> As required in Table 6 #10, install CPMS at the inlet of the catalyst and conduct subsequent performance tests every 8760 hours of operation or every 3 years, whichever comes first, to demonstrate compliance with the chosen CO emission standard, using the test methods in Table 4; and measure the pressure drop across the catalyst monthly.



40 CFR 63.6625(a); or 40 CFR 63.6625(b); and 40 CFR 63.8(c), (d), & (e)	Develop and implement a site-specific monitoring plan for the continuous monitoring system (CMS), to include a quality control program and performance evaluation test plan for the CMS, in accordance with 40 CFR 63.8.
40 CFR 63.6625(g)	Install crankcase ventilation system if not already equipped.
40 CFR 63.6665	Meet all of the general provisions of Subpart A, from Sections 63.1 through 63.15, that apply to the CI RICE, as identified in Table 8 to Subpart ZZZZ.

c) Operational Restrictions

- (1) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR 63.6625(a)(1)	If using CEMS for compliance, CEMS must be installed, operated, and maintained in continuous operation in accordance with the performance specifications of 40 CFR 60, Appendix B.
40 CFR 63.6625(b)(2)	If using CPMS for compliance, CPMS must be installed, operated, and maintained in continuous operation in accordance with the site-specific monitoring plan.
40 CFR 63.6604	Compliance with 80.510(b) for the quality of diesel fuel burned in non-emergency CI ICE with a displacement of less than 30 liters/cylinder and a site rating of more than 300 brake horsepower. Standard for diesel fuel oil.
40 CFR 63.6605	General duty to minimize emissions, with good air pollution control practices for minimizing emissions; and compliance required at all times.
40 CFR 63.6625(h)	Minimize idle and startup time, not to exceed 30 minutes.
40 CFR 63.6603; 40 CFR 63.6640(a); and Subpart ZZZZ Table 2b #1	Comply with operating limitations in Table 2b: The temperature of the stationary RICE exhaust at the inlet of the oxidation catalyst shall be maintained at greater than or equal to 450 degrees Fahrenheit and less than or equal to 1,350 degrees Fahrenheit; and the pressure drop across the catalyst shall be maintained at no more than 2 inches of water, plus or minus 10% of the pressure drop measured during the initial performance test, at 100% load.
40 CFR 63.6625(b)(4) through (6)	Must conduct an annual equipment performance evaluation or system accuracy audit on the temperature measurement device. The temperature sensor must meet the minimum tolerance range and must be installed, operated, and maintained as specified in 40 CFR 63.6625(b) and in accordance with the site-specific monitoring plan.



- (2) The permittee shall burn only No. 2 fuel oil in this emissions unit.

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

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR 63.6625(a); 40 CFR 63.8; and Subpart ZZZZ Table 6 #3	<p>If installing CEMS to demonstrate continuous compliance must conduct:</p> <ol style="list-style-type: none"> <li>1. daily and periodic data quality checks in accordance with 40 CFR Part 60, Appendix F, procedure 1.</li> <li>2. an initial performance evaluation of the CEMS (initially in conjunction with the appropriate test methods in Table 4) using Performance Specifications 3 and 4A (PS 3 and 4A) of 40 CFR Part 60, Appendix B; and</li> <li>3. annual relative accuracy test audits (RATA) for each CEMS according to the requirements in 40 CFR 63.8 and using PS 3 and 4A of 40 CFR Part 60, Appendix B.</li> </ol> <p>Each CEMS must complete a minimum of 1 cycle of operation each 15-minute period; and need at least 2 readings to have a valid hour of data. Data from the CEMS shall be reduced to 1-hour and 4-hour averages according to Table 6 #3.</p>
40 CFR 63.6625(b); 40 CFR 63.8; and Subpart ZZZZ Table 6 #10	<p>If installing CPMS to demonstrate continuous compliance, the CPMS must collect data at least once every 15 minutes and the catalyst inlet temperature shall be reduced to 4-hour rolling averages. The pressure drop across the catalyst must be monitored and recorded monthly. Develop site-specific monitoring plan for the CPMS.</p>
40 CFR 63.6603 and Subpart ZZZZ Table 2	<p>If not using CPMS to demonstrate compliance, maintain a daily log to record the catalyst inlet temperature. Maintain a monthly record of the pressure drop across the catalyst.</p>
40 CFR 63.6635	<p>Except for monitor malfunctions, associated repairs, and required quality assurance activities, must continuously monitor that the RICE is operating. Must use all valid data (not recorded during malfunctions, repairs, or required quality assurance or control activities) in calculations used to report emissions or operating levels.</p>
40 CFR 63.6640(a)	<p>Demonstrate continuous compliance with the emission limitation and operating limitations identified in Tables 2d and 2b according to the methods specified in Table 6 to Subpart ZZZZ.</p>
40 CFR 63.6655(a) and 40 CFR 63.10	<p>Keep records of:</p> <ol style="list-style-type: none"> <li>1. each notification and report submitted to comply with Subpart ZZZZ;</li> <li>2. the occurrence and duration of each malfunction of the RICE and any control or monitoring equipment;</li> <li>3. corrective actions taken during each period of malfunction to</li> </ol>



	minimize emissions and restore normal operations; 4. records of performance tests and performance evaluations; 5. all required maintenance performed on air pollution control and monitoring equipment; and 6. any excess emissions or parameter monitoring exceedances, as identified by 40 CFR 63.10.
40 CFR 63.6655(b); 40 CFR 63.10(b); and 40 CFR 63.8(d)	Keep records for each CEMS or CPMS used to demonstrate compliance, including: the performance evaluation/test plan; previous versions of the performance evaluation plan; performance tests and evaluations; results of the quality control program; CMS calibration checks; maintenance performed on air pollution control and monitoring equipment; the occurrence, duration, and corrective actions taken during periods of malfunction; and all measurements needed to demonstrate compliance with the relevant standard.
40 CFR 63.6655(d)	Keep the records required in Table 6 to Subpart ZZZZ to demonstrate continuous compliance.
40 CFR 63.6625(h)	Maintain a record of each idle and/or startup time that exceeded 30 minutes.
40 CFR 63.6660	Records readily available and retained for at least 5 years after the date of occurrence or date of report according to 63.10(b)(1).

(2) The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 described below:

a. Alternative 1:

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

b. Alternative 2:

The permittee shall collect a representative grab sample of oil that is burned in this emissions unit for each day when the emissions unit is in operation. If additional fuel oil is added to the tank serving this emissions unit on a day when the emissions unit is in operation, the permittee shall collect a sufficient number of grab samples to develop a composite sample representative of the fuel oil burned in this emissions unit. A representative grab sample of oil does not need to be collected on days when this emissions unit is only operated for the purpose of "test-firing." The permittee shall maintain records of the total quantity of oil burned each day, except for the purpose of test-firing, the permittee's analyses for sulfur content and heat content, and the



calculated sulfur dioxide emission rate (in lbs/MMBtu). The sulfur dioxide emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

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

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

- (3) For each day during which the permittee burns a fuel other than number two fuel oil, the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.

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

e) Reporting Requirements

- (1) A comprehensive written report on the results of the performance tests, conducted to demonstrate compliance with 40 CFR 63.6603(a) and OAC 3745-110-03(F), shall be signed by the person or persons responsible for the tests and submitted to the appropriate Ohio EPA District Office or local air agency 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 appropriate Ohio EPA District Office or local air agency.

[OAC rule 3745-15-04(A)]; [40 CFR 63.6645(h)]; and [40 CFR 63.9(h)(2)(ii)]

- (2) The permittee shall comply with the following applicable requirements identified in 40 CFR Part 63, Subpart ZZZZ:

Applicable Rule	Requirement
40 CFR 63.6604	Identify in the semiannual compliance reports any period of time (date and number of hours), during the reporting period, that the quality of oil burned in this emissions unit did not meet the requirements established in 40 CFR 80.510(b).
40 CFR 63.6640(b)	Submit a report of each instance in which the emission limitation or operating limitations in Tables 2d and 2b were not met; these deviations to be reported according to the requirements of 63.6650.
40 CFR 63.6640(e)	Submit a report of each instance in which the applicable requirements in Table 8 to Subpart ZZZZ, the general provisions from Subpart A, were not met.
40 CFR 63.6645(a)(2)	Submit all notifications required per 63.7(b) and (c); 63.8(e), (f)(4), and (f)(6); and 63.9(b) through (e), (g), and (h) that apply to the CI RICE.
40 CFR	Upon request, submit a performance evaluation test plan for each



63.6625(a) & (b); 40 CFR 63.7(c); and 40 CFR 63.8(d) & (e)(3)	monitoring system and/or the site-specific test plan to the office requesting it.
40 CFR 63.6645(g); 40 CFR 63.7(b); CFR 63.8(e); and CFR 63.9(e) & (g)	Submit a Notification of Intent to conduct a performance test for the emissions unit or a performance evaluation of the CMS at least 60 days before the test is scheduled to begin.
40 CFR 63.6645(h); 40 CFR 63.6630(c); 40 CFR 63.8(e)(5); 40 CFR 63.9(h); 40 CFR 63.10(d)(2) & (e)(2); and OAC rule 3745-15-04(A)	Submit a Notification of Compliance Status for each compliance demonstration required in Tables 3 and 5 to Subpart ZZZZ, including the performance test and CMS performance evaluation results, before the close of business on the 60 <sup>th</sup> day following the completion of the test; or within 30 days of the initial compliance demonstration if the demonstration does not include a performance test. OAC rule 3745-15-04(A) requires performance test results to be submitted within 30 days of the test date unless additional time is requested.
40 CFR 63.6650(a)	Submit each applicable report in Table 7 of Subpart ZZZZ.
40 CFR 63.6650(b)(1) to (5) and Subpart ZZZZ Table 7 #1	Following the initial compliance date, submit Semiannual Compliance Reports to include the information identified in 63.6650(c) through (f), as applicable to the CI ICE. Following the initial compliance report, each subsequent report shall cover the reporting period from January 1 <sup>st</sup> through June 30 <sup>th</sup> and July 1 <sup>st</sup> through December 31 <sup>st</sup> . The Semiannual Compliance Reports must be postmarked or delivered no later than July 31 <sup>st</sup> and January 31 <sup>st</sup> .
40 CFR 63.6650(c)	63.6650(c) contains the required information to be submitted in each compliance report.
40 CFR 63.6650(d) & (e)	63.6650(d) contains the required information to be submitted for each deviation from an emission or operating limitation not monitored by a continuous monitoring system (CMS) and 63.6650(e) the information needed where using a CMS to comply with the emission or operating limitation.

- (3) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
- a. Any exceedance of the allowable sulfur dioxide emission limitation, pounds sulfur dioxide/MMBtu actual heat input.



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(A)(3)]

- (4) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than number two fuel oil was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.

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

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

[Authority for Term: OAC rule 3745-77-07(A)(3)].

f) **Testing Requirements**

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

- a. Emission Limitation:

SO<sub>2</sub> emissions shall not exceed 0.5 lb/MM Btu actual heat input.

Applicable Compliance Method:

Continuous compliance with the allowable SO<sub>2</sub> emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received, or each daily composite sample of the oil burned during each calendar day, meets the limitation.

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

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

- b. Emission Limitation:

PE shall not exceed 0.062 lb/MM Btu of actual heat input.



Applicable Compliance Method

Compliance shall be based upon an emission factor of 0.012 lb/mmBtu. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Section 3.1 (4/2000), Table 3.1-2a.

If required, compliance shall be based upon stack testing in accordance with Methods and procedures specified in OAC rule 3745-17-03(B)(10).

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

c. Emission Limitations

The visible PE from the stack serving this emissions unit shall not exceed 20 percent opacity as a six-minute average, except as provided by rule.

Applicable Compliance Method

If required, compliance with the stack visible particulate emissions limitation shall be determined through visible emissions observations performed in accordance with U.S. EPA Method 9.

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

d. Emission Limitations:

3.0 grams NO<sub>x</sub>/HP-hr

Applicable Compliance Method:

Compliance with the emission limitations shall be based on the NO<sub>x</sub> emissions testing data, as specified below and by operating and maintaining the engine according to the manufacturer's specifications.

The permittee shall demonstrate compliance with the 3.0 grams/HP-hr emission limitation through exhaust emission tests performed in accordance with 40 CFR Part 60, Appendix A, Methods 1 through 4 and 7, 7A, 7C, 7D, or 7E, as appropriate, and the requirements of OAC rule 3745-110-05. The compliance demonstrations shall be performed while the engine is operating at, or as close as possible, to 100% load and 100% of its speed. The permittee shall obtain any additional test data (i.e., flow rates, oxygen concentrations, moisture contents, etc.), diluent monitoring data, source fuel usage, and/or horsepower data, concurrent with the required compliance demonstration in order to convert the emission test results or monitoring data to the units of the applicable limit. Compliance demonstrations shall be performed that are representative of the normal operating modes, including fuel types or fuel blends employed and shall exclude periods of startup, shutdown, malfunction, and low load operating conditions.



e. Emission Limitations:

23 ppmvd CO at 15% O<sub>2</sub> or

reduce CO by 70% and

Applicable Compliance Method:

The appropriate tests methods from Table 4 to Subpart ZZZZ shall be conducted based on the option chosen for compliance, i.e., the part per million concentration or percent reduction. The appropriate emission and/or operating limitations, required per 40 CFR 63.6630 and identified in Table 5, shall be established and compliance demonstrated during each performance test.

The temperature at the inlet to the catalyst shall be monitored during the performance test and maintained between 450 °F and 1350 °F. The 3-hour block average temperature at the inlet to the catalyst shall be documented during performance tests and the pressure drop shall be recorded to establish the operating range for the pressure drop across the catalyst. Per 63.6640(b), if the catalyst is changed or the control device replaced, a new performance test must be conducted to demonstrate compliance with the emission limitation and to reestablish the values for or compliance with the operating parameters.

Each performance test shall consist of 3 separate test runs and each test run shall last a minimum of 1 hour and shall be conducted during normal operations. The engine percent load, during the performance test, shall be determined by documenting the calculations, assumptions, and measurement devices used to measure or estimate the percent load and the estimated percent load shall be included in the notification of compliance.

A compliant performance test shall demonstrate that either the CO emissions have been reduced by 70% or that the average CO concentration is less than or equal to 23 ppmvd, corrected to 15 percent O<sub>2</sub> on a dry basis, and from three 1-hour or longer performance test runs.

If demonstrating compliance with the 70% control requirement for CO, the permittee may use a portable CO and O<sub>2</sub> analyzer at the inlet and outlet of the control device and use ASTM Method D6522-00 to meet the performance testing requirement in Table 4 to Subpart ZZZZ. The CO concentrations at the inlet and outlet of the control device must be normalized to a dry basis and to 15% oxygen, or an equivalent percent CO<sub>2</sub>, as required in 40 CFR 63.6620(e).

The following test methods shall be employed to demonstrate compliance with the emission limitation for CO or may be used to demonstrate compliance with the control requirement for CO:

- i. Method 1 or 1A of 40 CFR Part 60, Appendix A to select the sampling port location and the number of traverse points



- ii. Method 3, 3A, or 3B of 40 CFR Part 60, Appendix A or ASTM Method D6522-00 to measure O<sub>2</sub> at the inlet and outlet of the control device to normalize the CO concentration(s).
- iii. Method 4 of 40 CFR Part 60, Appendix A; or Method 320 of 40 CFR Part 63, Appendix A; or ASTM D6348-03 to measure the moisture content at the inlet and outlet of the control device if demonstrating compliance through the percent control or to measure the moisture content of the stationary RICE exhaust.
- iv. Method 10 of 40 CFR Part 60, Appendix A; or Method 320 of 40 CFR Part 63, Appendix A; or ASTM D 6348-03 to measure CO at the inlet and outlet of the control device if demonstrating compliance through the percent control or to measure CO at the exhaust of the stationary ICE.
- v. The following equation shall be used to normalize the CO concentrations to a dry basis and to 15 percent oxygen (O<sub>2</sub>)\*\*:

$$C_{adj} = C_d (5.9 / 20.9 - \% O_2)$$

Where:

C<sub>adj</sub>= calculated CO concentration adjusted to 15 percent O<sub>2</sub>.

C<sub>d</sub>= measured concentration of CO, uncorrected.

5.9 = 20.9 percent O<sub>2</sub> – 15 percent O<sub>2</sub>, the defined O<sub>2</sub> correction value, percent.

%O<sub>2</sub> = measured O<sub>2</sub> concentration, dry basis, percent.

\*\* Optionally, the pollutant concentrations can be corrected to 15% O<sub>2</sub> using a CO<sub>2</sub> correction factor, by calculating the fuel factor (F<sub>o</sub> value) using Method 19 results obtained during the performance test (40 CFR 63.6620(e)(2)).

- vi. If compliance is demonstrated for the control efficiency for CO, the following equation shall be used to determine the percent reduction:

$$R = (C_i - C_o) / C_i \times 100$$

Where:

C<sub>i</sub>= concentration of CO at the control device inlet,

C<sub>o</sub>= concentration of CO at the control device outlet, and

R = percent reduction of CO emissions.



**Preliminary Proposed Title V Permit**

DP&L, Monument Substation

**Permit Number:** P0109268

**Facility ID:** 0857040926

**Effective Date:** To be entered upon final issuance

If using CEMS to monitor and comply with the CO concentration limitation or requirement to reduce CO emissions, the permittee shall conduct annual relative accuracy test audits (RATA) using Performance Specifications 3 and 4A of 40 CFR Part 60 Appendix B and daily and periodic data quality checks in accordance with 40 CFR Part 60, Appendix F, Procedure 1.

If using a CPMS to demonstrate compliance, the permittee shall conduct subsequent performance tests for CO (concentration or % reduction) every 8,760 hours of operation or every 3 years, whichever comes first.

The permittee shall notify the Director (appropriate Ohio EPA Division of Air Pollution Control District Office or local air agency) in writing of each scheduled performance test date or RATA for the CEMS at least 60 calendar days before it is scheduled, to allow the agency time to review and approve the site-specific test plan and to arrange for an observer to be present during the compliance demonstration.

Personnel from the appropriate Ohio EPA District Office or local air agency shall be permitted to witness the test(s), examine the testing equipment, and acquire data and information necessary to ensure that the operation of the emissions unit and the testing procedures provide a valid characterization of the emissions from the emissions unit and/or the performance of the control equipment.

[40 CFR 63.7(a)(2), (b)(1), and (e)], [40 CFR 63.6603(a)], [40 CFR 63.6612], [40 CFR 63.6615], [40 CFR 63.6620], [40 CFR 63.6630], [40 CFR 63.6640(a) and (b)], [40 CFR 63.6645(a)(2)], [Part 63, Subpart ZZZZ, Table 2d #3; Table 2b; Table 3 #4; Table 4 #1 or #3; Table 5 #1, #2, #5, or #6; and Table 6 #3 or #10], [OAC 3745-110-03(F)(3)], [OAC 3745-110-05(A) and (F)], and [OAC rule 3745-15-04(A)]

g) Miscellaneous Requirements

(1) None.