



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

11/13/2015

Certified Mail

Mr. David Filippi
Dover Municipal Light Plant
303 East Broadway
Dover, OH 44622-1914

Facility ID: 0679010146
Permit Number: P0090801
County: Tuscarawas

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 9/22/2015. 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 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 Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138

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,

A handwritten signature in black ink that reads "Michael E. Hopkins".

Michael E. Hopkins, P.E.
Assistant Chief Permitting Section, DAPC

Cc: Ohio EPA DAPC, Southeast District Office



Response to Comments

Facility ID:	0679010146
Facility Name:	Dover Municipal Light Plant
Facility Description:	
Facility Address:	303 East Broadway Dover, OH 44622-1914 Tuscarawas County
Permit:	P0090801, Title V Permit - Renewal
A public notice for the draft permit issuance was published in the Ohio EPA Weekly Review and appeared in the The Times-Reporter on 10/04/2015. The comment period ended on 11/03/2015.	
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.

1. Topic: Boiler MACT Compliance Deadline

a. Comment:

The draft Title V operating permit makes multiple references to the compliance deadline for 40 CFR Part 63, Subpart DDDDD (i.e., Boiler MACT), specifically as it applies to Boiler #4 (B004). These references occur on pages 18, 26, and 27 of the draft permit, and incorrectly specify a compliance date of January 31, 2016. As detailed in the May 30, 2014 letter from Craig Butler of Ohio EPA to Dave Filippi of Dover, the plant was granted an extension of up to one (1) year to achieve compliance with the rule. Accordingly,

Dover respectfully requests that Ohio EPA update the draft Title V permit to reflect a compliance date of January 31, 2017.

b. Response:

This change has been made. Language citing extension letter issued by Director on May 30, 2014, has been incorporated into Section B.2, as well as changing the above mentioned dates from 1/31/16 to 1/31/17.



2. Topic: Insignificant Activities

a. Comment:

Its Dover's understanding that all insignificant emission units (IEUs) with applicable requirements should be listed in Section B of a Title V permit. As included in the corrected Title V application no. A0050225, the Dover Municipal Light Plant operates the following IEUs with applicable requirements:

- B009—4.9 MMBtu/hr Internal Combustion Starter for Gas Turbine
- B010—Diesel Internal Combustion Compressor System Primary Back-up
- F001—Plant Coal Handling System
- F002—Plant Ash Handling System

Accordingly, Dover respectfully requests that Ohio EPA include these IEUs in Section B of the draft Title V permit.

b. Response:

This change has been made; you will find the new term in Section B.5.

3. Topic: Incorrect NO_x Emission Factor Reference for B005

a. Comment:

The Gas Turbine (i.e., B005) is limited to 0.35 pounds of NO_x per million BTU (lb/MMBtu) actual heat input, as correctly specified in Section C.2.b)(1)a. of the draft permit. However, Section C.2.f)(1)b. contains the following erroneous reference to an emission factor of 0.32 lb/MMBtu:

The tpy emission limitation was established utilizing the following calculation:

[(NO_x Emission Factor lb/MMBtu of actual heat input x Maximum heat input MMBtu/hour) x Maximum hours operating/year] / 2000 pounds/ton

Where:

NO_x emissions factor = 0.32 pound/MMBtu actual heat input;

Dover respectfully requests that Section C.2.f)(1)b. be updated to reference the correct emission factor of 0.35 lb/MMBtu throughout.

b. Response:

This change has been made.



PRELIMINARY PROPOSED

Division of Air Pollution Control Title V Permit for Dover Municipal Light Plant

Facility ID:	0679010146
Permit Number:	P0090801
Permit Type:	Renewal
Issued:	11/13/2015
Effective:	To be entered upon final issuance
Expiration:	To be entered upon final issuance



Division of Air Pollution Control
Title V Permit
for
Dover Municipal Light Plant

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Preliminary Proposed Title V Permit

Dover Municipal Light Plant

Permit Number: P0090801

Facility ID: 0679010146

Effective Date: To be entered upon final issuance

Authorization

Facility ID: 0679010146
Facility Description:
Application Number(s): A0022124, A0022125, A0022126, A0050225
Permit Number: P0090801
Permit Description: Title V Renewal permit for B004 (247 MMBtu/hr Spreader Stoker Boiler), B005 (252 MMBtu/hr Natural Gas Combustion Turbine), B007 (4.86 MMBtu/hr Natural Gas-Fired Compressor Engine), and B008 (19.5 MMBtu/hr Stationary Large Bore Internal Combustion Diesel Generator).
Permit Type: Renewal
Issue Date: 11/13/2015
Effective Date: To be entered upon final issuance
Expiration Date: To be entered upon final issuance
Superseded Permit Number: P0090800

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

Dover Municipal Light Plant
303 East Broadway
Dover, OH 44622-1914

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

Ohio EPA DAPC, Southeast District Office
2195 Front Street
Logan, OH 43138
(740)385-8501

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, Southeast 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

Craig W. Butler
Director



Preliminary Proposed Title V Permit
Dover Municipal Light Plant
Permit Number: P0090801
Facility ID: 0679010146
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 Ohio EPA DAPC, Southeast 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.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 Ohio EPA DAPC, Southeast 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)(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 Ohio EPA DAPC, Southeast District Office 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 Ohio EPA DAPC, Southeast 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, Southeast 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 [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 Ohio EPA DAPC, Southeast 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, Southeast 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 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 Ohio EPA DAPC, Southeast 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, Southeast 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, Southeast 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, Southeast 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, Southeast 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.



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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. The permittee shall comply with the applicable provisions of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters, as promulgated by the United States Environmental Protection Agency under 40 CFR Part 63, Subpart DDDDD. The final rules found in 40 CFR Part 63, Subpart DDDDD establish national emission standards for hazardous air pollutants (NESHAP), operational limits, work practice standards, and compliance requirements for industrial, commercial, and institutional boilers located at a major source of hazardous air pollutants (HAP). The permittee shall comply with the requirements and limits of this NESHAP for the facility's new (commenced construction after 6/4/10) boilers by January 31, 2013, or upon startup, whichever is later; and the facility's existing boilers shall be in compliance with 40 CFR Part 63, Subpart DDDDD no later than January 31, 2017, as designated in the extension letter from the Director dated May 30, 2014.

[Authority for term: 40 CFR 63.6(b)(2), 40 CFR 63.7485, 40 CFR 63.7490 and 40 CFR 63.7495]

3. The terms in this permit identify the requirements of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) contained in 40 CFR Part 63, Subpart DDDDD and are meant to help the permittee maintain compliance with this NESHAP. The requirements of this Subpart apply to the facility's boilers and process heaters according to their applicable subcategory, as identified in 40 CFR 63.7499 and as defined in 40 CFR 63.7575.

[Authority for term: 40 CFR Part 63, Subpart DDDDD]

4. The Ohio EPA, Southeast District Office has approved the Compliance Assurance Monitoring (CAM) plan submitted by the permittee, pursuant to 40 CFR Part 64, for emissions unit B004. The permittee shall comply with the provisions of the plan (as specified in Part C – Terms and Conditions for Emissions Units) during any operation of the aforementioned emissions units.

[Authority for term: 40 CFR Part 64]

5. The following insignificant emissions units at this facility must comply with all applicable State and federal regulations, as well as any emissions limitations and/or control requirements contained within a permit-to-install for that emissions unit.

EU ID	Operations, Property and/or Equipment Description
B009	4.9 MMBtu/hr Internal Combustion Starter for Gas Turbine
B010	Diesel Internal Combustion Compressor System Primary Back-up
F001	Plant Coal Handling System
F002	Plant Ash Handling System

[Authority for term: OAC rule 3745-77-07(A)(13)]



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C. Emissions Unit Terms and Conditions



1. B004, Boiler #4

Operations, Property and/or Equipment Description:

247 MMBtu/Hour Coal-Fired Spreader Stoker Boiler, controlled by a baghouse with a 99% control efficiency and 100% capture efficiency, installed on 01/01/1962, backup fuel – natural gas

- 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.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-18-85(E)	Sulfur dioxide (SO ₂) emissions shall not exceed 4.6 lbs/mmBtu actual heat input.
b.	40 CFR Part 63 Subpart DDDDD, the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers and Process Heaters. (applicability 40 CFR 63.7485; affected source, 40 CFR 63.7490)	<p>The emissions from the boiler(s) shall not exceed the following emission limitations, except during startup and shutdown, as identified in the most recent amendment to 40 CFR Part 63, Subpart DDDDD, and as identified in:</p> <p>Table 2 for existing units:</p> <p>4.0E-02 lb of filterable particulate matter (PM)/MMBtu of heat input; or</p> <p>5.3E-05 lb or Total Selected Metals (TSM)/MMBtu of heat input; and</p> <p>2.2E-02 lb of hydrogen chloride (HCl)/MMBtu of heat input; and</p> <p>5.7E-06 lb of mercury (Hg)/MMBtu of heat input; and</p> <p>160 ppm carbon monoxide (CO) by volume on a dry basis, corrected to 3% O₂, 3-run average.</p> <p>Boilers subject to emission standards in Table 2 shall also meet the work practice standards identified in Table 3 during</p>



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>startup and shutdown of the unit and the tune-up requirements, as applicable, in Table 3.</p> <p>Boilers not subject to emission standards shall meet the tune-up requirements identified in Table 3 as applicable to the unit.</p> <p>The permittee shall demonstrate compliance with the limits published in the final amendments to Subpart DDDDD, as required by the subpart.</p>
c.	OAC rule 3745-17-10(C)	<p>Particulate emissions shall not exceed 0.23 lb/mmBtu. See b)(2)c.</p> <p>The particulate emission limitation required by this applicable rule is less stringent than the particulate emission limitation established pursuant to 40 CFR Part 63, Subpart DDDDD.</p>
d.	40 CFR 63.7525(c); and 40 CFR Part 63, Subpart DDDDD; Table 4 #3 and #6; and Table 8 #1	Where not required to install PM CPMS, PM CEMS*, or where not using a bag leak detection system, COMS* must be used to demonstrate compliance with the opacity standard and visible emissions shall not exceed 10% opacity as a daily block average.
e.	OAC rule 3745-17-07(A)(1)	The visible particulate emission limitation required by this applicable rule is less stringent than the visible particulate emission limitation established pursuant to 40 CFR Part 63, Subpart DDDDD.
f.	40 CFR Part 64	See b)(2)a, b)(2)b, b)(2)q, d)(1), d)(2) and d)(3).

†based on a 30-day rolling average if ≥ 250 MMBtu/hr and designed to burn coal/solid fossil fuel or heavy liquid fuel, and must install either PM CPMS in 40 CFR 63.7525(b)(4) or PM CEMS in (b)(8), per 40 CFR 63.7525.

*continuous monitoring system (CMS), continuous emissions monitoring system (CEMS), continuous opacity monitoring system (COMS), and continuous parameter monitoring system (CPMS).



(2) Additional Terms and Conditions

- a. The permittee shall maintain a written quality assurance/quality control plan for the continuous opacity monitoring system, designed to ensure continuous valid and representative readings of opacity and compliance with 40 CFR Part 60, Appendix B, Performance Specification 1. The plan shall include, at a minimum, procedures for conducting and recording daily automatic zero/span checks, provisions for conducting a quarterly audit of the continuous opacity monitoring system, and a description of preventive maintenance activities. The plan shall describe step by step procedures for ensuring accurate operation of the continuous opacity monitoring system on a continuous basis. The quality assurance/quality control plan and a logbook dedicated to the continuous opacity monitoring system must be kept on site and available for inspection during regular office hours.

[Authority for term: 40 CFR 60.13 and 40 CFR Part 60, Appendix B]

- b. The continuous opacity monitoring system consists of all the equipment used to acquire data and record opacity.

[Authority for term: 40 CFR 60.2, 40 CFR 63.2 and Appendix B to 40 CFR Part 60]

- c. The particulate emissions for the fuel burning equipment fired with coal shall not exceed the allowable emission rate specified by Curve P-2 of Figure I, from the Appendix of OAC rule 3745-17-10, or shall not exceed 0.23 pound per million Btu.

[Authority for term: OAC rule 3745-17-10(C)(2)]

- d. The emissions of SO₂ from B004 shall not exceed 4.6 pounds of SO₂ per million Btu actual heat input from each boiler.

[Authority for term: OAC rule 3745-18-85(E)]

- e. The permittee shall develop a site-specific continuous monitoring system (CMS) performance evaluation test plan and shall, upon request, submit a copy to the appropriate District Office or local air agency of the Ohio EPA Division of Air Pollution Control (DAPC) for evaluation and/or approval. A performance evaluation of each CMS shall be conducted in accordance with the site-specific performance evaluation test plan. The continuous monitoring system (CMS) shall be operated and certified in accordance with the appropriate performance specification under Appendix B to Part 60 and shall meet the requirements of 40 CFR 63.7525. The test evaluation of the CMS(s) shall demonstrate the precision and accuracy of the equipment and completeness of the data collected. The site-specific performance evaluation test plan shall require all CMS (systems required by rule) be maintained in continuous operation during process operations. The site-specific monitoring plan shall address the following requirements:



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- i. the design, data collection, quality assurance, and quality control elements outlined in 40 CFR 63.8(d);
- ii. installation of the CEMS sampling probe at a location that is representative of the exhaust emissions (e.g., on or downstream of the last control device);
- iii. performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction systems;
- iv. performance evaluation procedures and acceptance criteria (e.g., calibrations, accuracy audits, analytical drift);
- v. ongoing operation and maintenance procedures in accordance with the general requirements of 40 CFR 63.8(c);
- vi. ongoing data quality assurance procedures in accordance with the general requirements of 40 CFR 63.8(d); and
- vii. ongoing record keeping and reporting procedures in accordance with the requirements of 40 CFR 63.10(c) and (e).

The performance evaluation test plan shall also include the evaluation program objectives, an evaluation program summary, the performance evaluation schedule, data quality objectives, and both an internal and external quality assurance (QA) program.

- viii. The internal QA program shall include, at a minimum, the activities planned by routine operators and analysts to provide an assessment of CMS performance.
- ix. The external QA program shall include, at a minimum, provisions for systems audits and validation of instrument calibrations, data collection, sample logging, and documentation of quality control data and field maintenance activities and must also address the following requirements:
 - (a) each CMS (parameter monitor or sampling probe) shall be installed at a location that accurately measures the exhaust emissions representative of the emissions unit (e.g., on or downstream of the last control device) and accurately measures the process and/or the control device parameters;
 - (b) performance and equipment specifications for the sample interface, the pollutant concentration or parametric signal analyzer, and the data collection and reduction systems; and
 - (c) performance evaluation procedures and acceptance criteria, including calibration frequency, results, and records.



The permittee shall notify both the Central Office and the appropriate District or local office of the Ohio EPA DAPC at least 60 days before the performance evaluation is scheduled for a CEMS or COMS, or by a mutually agreed upon (by DAPC Central Office) date. The permittee shall notify the appropriate District or local office of the Ohio EPA DAPC at least 60 days before the performance evaluation is scheduled for a CPMS. The DAPC may request a copy of the site-specific performance evaluation test plan and additional relevant information following the review of a site-specific performance evaluation test plan. All CMS shall be installed, operational, and the data verified, as specified in 40 CFR 63.7505(d), either prior to or in conjunction with conducting performance tests required under 40 CFR 63.7.

[Authority for term: 40 CFR 63.7505(d) and 40 CFR 63.8(d) and (e)]

- f. The permittee shall develop and, if requested, submit a site-specific test plan to the Director (appropriate Ohio EPA Division of Air Pollution Control, District Office or local air agency) for evaluation and approval, at least 60 calendar days before the performance test is scheduled to take place and simultaneously with the notification of intention to conduct a performance test, unless the Director agrees upon a different date. The site-specific test plan shall demonstrate the precision and accuracy of the equipment and completeness of the data collected. The test plan shall include, at a minimum, the following elements: a test program summary; the test schedule; data quality objectives; and both an internal and external quality assurance (QA) program.

The internal quality assurance (QA) program shall include, at a minimum, the activities planned by routine operators and analysts to provide an assessment of test data precision (e.g.: sampling and analysis of replicate samples). The external QA program shall include, at a minimum, the following elements:

- i. provisions for a test method performance audit during the performance test, in order to provide a measure of test data bias;
- ii. provisions for systems audits, instrument calibration, data validation, sample logging, and documentation of quality control data and field maintenance activities; and
- iii. provisions to provide appropriate notice (60 days), to the Director, of the performance test, performance audit, and systems audit, allowing the regulating agency the opportunity to arrange for their own on-site evaluation.

The performance audits shall consist of blind audit samples, provided by an accredited audit sample provider, which shall be taken and analyzed during each performance test. The Director may request additional relevant information following the receipt and review of the site-specific test plan.

[Authority for term: 40 CFR 63.7(c)]



- g. If not required to install CPMS (or CEMS) for PM in accordance with 40 CFR 63.7505(d) and choosing to use a bag leak detection system to demonstrate compliance, the permittee shall develop (and submit upon request) a site-specific monitoring plan for the bag leak detection system. The site-specific monitoring plan shall address the following requirements:
- i. the location(s) where the bag leak detection sensor(s) are to be installed, i.e., in a position(s) that is representative of the relative or absolute PM loadings from each exhaust stack, roof vent, or compartment of the fabric filter;
 - ii. provisions for performance evaluations of the bag leak detection system, to be conducted in accordance with the site-specific monitoring plan and the guidance provided in U.S. EPA's document number "EPA-454/R-98-015";
 - iii. provisions requiring the bag leak detection system to be certified by the manufacturer to be capable of detecting PM emissions at concentrations of 10 milligrams per actual cubic meter or less;
 - iv. provisions requiring the bag leak detection system to be equipped with a device to continuously record the output signal from the sensor;
 - v. provisions requiring the bag leak detection system to be equipped with a system that will alert plant operating personnel when an increase in relative PM emissions are detected over a preset level (alert set point);
 - vi. provisions requiring the system alert to be placed in a location where it can be easily heard or seen by plant operating personnel and it may be shared among detectors;
 - vii. identification of the corrective action(s) to be initiated within 1 hour of a system alert and provisions requiring repairs, replacements, and/or adjustments to be completed as soon as practical; and
 - viii. provisions requiring the fabric filter system to be operated and maintained so that the periods that would cause an alert are no more than 5% of the operating time during any 6-month period.

[Authority for term: 40 CFR 63.7525(j), 40 CFR 63.7530(b)(4), 40 CFR 63.7540(a)(7), and Subpart DDDDD Tables 4 #3b and 8 #3]



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- h. Any reference to the “Director” in this permit shall take the meaning of the applicable District Office or local air agency of the Division of Air Pollution Control (DAPC), unless otherwise specified in the terms. Unless other arrangements have been approved by the Director, notification of the initial certification and performance evaluations of a continuous monitoring system (CMS), scheduled performance testing, and all required reports shall be submitted through the Ohio EPA’s eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-77-07]

- i. Except for existing units demonstrating compliance through emissions averaging (40 CFR 63.7522), each existing boiler subject to Part 63 Subpart DDDDD shall meet each applicable emission limit in Table 2; and all existing boilers shall meet the work practice standards identified in Table 3 and each applicable operating limit for the control device(s) identified in Table 4, by the compliance date of 1/31/17.

[Authority for term: 40 CFR 63.7500(a)(1) and (2) and 40 CFR 63.7495]

- j. An existing boiler located at a major source of HAP shall demonstrate initial compliance with the emission limits in Table 2 of Part 63 Subpart DDDDD no later than 7/29/16 or no later than 180 days after re-start of a boiler that was not operated following the compliance date (1/31/17) or that has not operated for over a year following the last compliance demonstration.

[Authority for term: 40 CFR 63.7510(e) and (j), 40 CFR 63.7515(g), 40 CFR 63.7495(b), and 40 CFR 63.7(a)(2)]

- k. For each existing boiler a one-time energy assessment must be performed by a qualified energy assessor no later than 1/31/17. The one-time energy assessment for existing units must include the following:

- i. a visual inspection of the boiler system;
- ii. an evaluation of operating characteristics of the boiler systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
- iii. an inventory of major energy use systems consuming energy from affected boilers, which are under the control of the boiler operator;
- iv. a review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
- v. a review of the facility’s energy management practices and recommendations for improvements consistent with the definition of energy management practices, if identified;
- vi. a list of cost-effective energy conservation measures that are within the permittee’s control;



- vii. a list of the energy savings potential of the energy conservation measures identified; and
- viii. a comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping these investments.

[Authority for term: 40 CFR 63.7510(e) and (j) and 40 CFR Part 63, Subpart DDDDD, Table 3 #4]

- i. Following the initial compliance date, tune-ups must be conducted for each boiler within the applicable annual, biennial, or 5-year schedule as specified in 40 CFR 63.7500(c), (d), and (e), 40 CFR 63.7540(a)(10) through (13), and Table 3 to the subpart. An initial tune-up must be completed for an existing boiler no later than 1/31/17; unless the boiler is not in operation at this time, where a tune-up must be completed within 30 days after the re-start of the boiler.

[Authority for term: 40 CFR 63.7500(c), (d), and (e), 40 CFR 63.7510(e) and (j), 40 CFR 63.7515(d) and (g), 40 CFR 63.7540(a)(10) through (13) and 40 CFR Part 63, Subpart DDDDD, Table 3]

- m. The emissions limits, work practice standards, and operating limits of the NESHAP apply at all times of boiler operation, except during periods of startup and shutdown during which the requirements of Table 3 #5 (startup) and #6 (shutdown) of Part 63, Subpart DDDDD apply. Compliance with the emissions limits is demonstrated through: performance stack testing; fuel analyses; and/or continuous monitoring using continuous monitoring systems (CMS), including continuous emission monitoring systems (CEMS), continuous opacity monitoring systems (COMS), continuous parameter monitoring systems (CPMS), and PM continuous parameter monitoring systems (PM CPMS).

[Authority for term: 40 CFR 63.7505(a) and (c), 40 CFR 63.7500(f) and 40 CFR 63.7540(d)]

- n. Following the initial compliance demonstration, compliance with the emission standards for HCl and Hg, or TSM where opting to comply with the standard for TSM instead of PM, may be demonstrated using fuel analysis (instead of a performance test) if the emission rate, calculated in accordance with 40 CFR 63.7530(c), is less than the applicable limit identified in Table 2. Fuel analyses shall be conducted in accordance with 40 CFR 63.7521 and Table 6 to Subpart DDDDD of Part 63. For gaseous fuels, fuel analysis cannot be used for compliance with the HCl or TSM standards.

[Authority for term: 40 CFR 63.7505(c) and 40 CFR Part 63, Subpart DDDDD, Table 6]

- o. Continuous compliance with each emission limit in Table 2, work practice standards in Table 3, and operating limits in Table 4 of the subpart shall be demonstrated in accordance with the methods specified in 40 CFR 63.7540(a) and Table 8 to Subpart DDDDD of Part 63. Operating above the established maximum or below the established minimum operating limit(s) shall constitute a deviation of the operating limits identified in Table 4 of the subpart.



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[Authority for term: 40 CFR 63.7540(a)(1) and 40 CFR Part 63, Subpart DDDDD, Tables 4 and 8]

- p. The permittee shall meet the applicable requirements of the General Provisions in 40 CFR Part 63, Subpart A as identified in Table 10 to the subpart.

[Authority for term: 40 CFR Part 63, Subpart DDDDD, Table 10]

- q. This emissions unit is a pollutant specific emissions unit for PM according to 40 CFR Part 64 and has developed a CAM plan, which was submitted to Ohio EPA on February 23, 2015.

Pursuant to 40 CFR Part 64, the permittee has submitted and the Ohio EPA has approved a CAM plan for emissions unit B004. The permittee shall comply with the provisions of the CAM plan during any operation of the aforementioned emissions unit.

[Authority for term: 40 CFR Part 64]

c) **Operational Restrictions**

- (1) For each boiler controlled by a baghouse equipped with a bag leak detection system, the bag leak detections system shall be installed, operated, and maintained in accordance with 40 CFR 63.7525(j); and the fabric filter system shall be operated and maintained so that the periods that would cause an alert are no more than 5% of the operating time during any 6-month period. Corrective action(s) must be initiated within 1 hour of a system alert and repairs, replacements, and/or adjustments must be completed as soon as practical.

[Authority for term: 40 CFR 63.7530(b)(4), 40 CFR 63.7525(j), 40 CFR 63.7540(a)(7) and Subpart DDDDD, Tables 4 #3b and 8 #3]

- (2) For boilers subject to a CO emission limit and the permittee is using the option to install an oxygen analyzer, the system shall be installed, calibrated, and maintained in accordance with the manufacturer's recommendations. The permittee shall maintain the 30-day rolling average oxygen concentration of the stack gas at or above the lowest hourly average O₂ concentration measured during each performance test demonstrating compliance with the CO limit, as specified in Table 8. The minimum O₂ level shall be set no lower than the minimum value established during the three performance tests.

[Authority for term: 40 CFR 63.7525(a), 40 CFR 63.7530(b)(4), 40 CFR 63.7575 and 40 CFR Part 63, Subpart DDDDD, Tables 4 #9, 7#4, and 8 #9]



- (3) For boilers subject to a CO emission limit and the permittee is using the option to install an oxygen trim system, the monitoring system shall maintain excess air at the desired level by providing a feedback signal to the combustion air controller. The oxygen concentration of the stack gas must be maintained at or above the lowest hourly average O₂ concentration measured during the most recent performance test demonstrating compliance with the CO limit. The minimum O₂ level shall be set no lower than the minimum value established during the three performance tests.

[Authority for term: 40 CFR 63.7525(a), 40 CFR 63.7530(b)(4) and 40 CFR 63.7575]

- (4) Carbon monoxide CEMS and the O₂ analyzer shall be install, certified, operated, and maintained in accordance with Performance Specification 4, 4A, or 4B of Part 60 Appendix B, the site-specific monitoring plan, 40 CFR 63.7525(a), and 40 CFR 63.8. The 30-day or 10-day (as applicable) rolling average CO concentration shall be maintained at or below the applicable CO CEMS-based standard identified in 2 to Part 63 Subpart DDDDD.

[Authority for term: 40 CFR 63.7525(a); 40 CFR 7540(a)(8), 40 CFR 63.7510(c); 40 CFR 63.8; and 40 CFR Part 63, Subpart DDDDD, Table 8 #10]

- (5) For each boilers where compliance was/is demonstrated through a performance test, the permittee shall maintain the operating load such that is does not exceed 110% of the highest hourly average operating load recorded during the most recent performance test demonstrating compliance.

[Authority for term: 40 CFR 63.7520(c) and 40 CFR Part 63, Subpart DDDDD, Table 4 #8 and Table 8 #10]

- (6) The permittee, demonstrating compliance through fuel analyses for HCl, Hg, or TSM, shall conduct monthly (or quarterly if meeting the requirements of 40 CFR 63.7515(e)) fuel analyses in accordance with 40 CFR 63.7521 and Table 6 to the subpart; and shall maintain the fuel type or fuel mixture such that the applicable emission rate(s), calculated according to 40 CFR 63.7530(c)(1), (2) and/or (3), are no more than or less than the applicable emission limits in Table 2 of the subpart. Following the first 12 months of compliance, the rolling 12-month average emissions of HCl, Hg, and/or TSM shall be maintained at or below the applicable emission limit(s).

[Authority for term: 40 CFR 63.7505(c), 40 CFR 63.7510(b), 40 CFR 63.7515(e), 40 CFR 63.7530(c), 40 CFR 63.7540(a)(2) and (3) and 40 CFR Part 63, Subpart DDDDD, Tables 4 #7, Table 6 and 8 #8]

- (7) A boiler, subject to the emissions standards in Table 2 of Subpart DDDDD to Part 63, must be operated to meet the work practice standards of Table 3 #5 during startups and Table 3 #6 during shutdowns.

[Authority for term: 40 CFR 63.7530(h) and 40 CRFR Part 63, Subpart DDDDD, Table 3 #5 & #6]



- (8) The boiler and associated air pollution control and monitoring equipment must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions.

[Authority for term: 40 CFR 63.7500(a)(3)]

- (9) All continuous monitoring system (CMS) shall be installed, operational, and the data verified, as specified in 40 CFR 63.8 and Subpart DDDDD, either prior to or in conjunction with conducting performance tests under 40 CFR 63.7 and 40 CFR 63.7520. The permittee shall maintain and operate each CMS as follows:

- a. The permittee shall maintain and operate each CMS in a manner consistent with safety and good air pollution control practices for minimizing emissions, as specified in 40 CFR 63.6(e)(1).
- b. The permittee shall keep the necessary parts for routine repairs and maintenance of the CMS equipment readily available.
- c. All continuous emissions monitoring system (CMS) must be installed at a location that accurately measures the exhaust emissions representative of the emissions unit (e.g., downstream of the last control device) and according to the procedures documented in the applicable performance specification; and any continuous parameter monitoring system (CPMS) shall be installed to accurately measure the process and/or the control device parameters.
- d. Verification of the operational status of each CMS shall include the completion of the manufacturer's written specifications or the recommendations for installation, operation, and calibration of the system.
- e. The read out, (the visual display or measured record of the CMS) or other indication of operation, from any CMS required for compliance with the emission standard, shall be readily accessible for operational control and visible for monitoring and recording by the operator of the equipment.
- f. Except for system breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high-level calibration drift adjustments, all CMS shall be maintained in continuous operation.
- g. All CMS for measuring emissions (other than opacity) shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive minute of operations (Ohio policy), with an average recorded for each 15-minute period. Data from the CEMS (excluding that collected during calibration, quality assurance, or maintenance activities, out-of-control periods, and/or CEMS breakdown) shall be reduced to 1-hour averages, computed from the four 15-minute averages.



- h. All COMS shall complete a minimum of one cycle of sampling and analyzing for each successive 10-second period and one cycle of data recording for each successive 6-minute period.

[Authority for term: 40 CFR 63.8(c)(1) through (4) and 40 CFR 63.8(g)(2)]

d) **Monitoring and/or Recordkeeping Requirements**

- (1) The permittee shall maintain on site, the document of certification received from the U.S. EPA or the Ohio EPA's Central Office verifying that the continuous opacity monitoring system has been certified to meet the requirements of 40 CFR Part 60, Appendix B, Performance Specification 1. The letter/document of certification shall be made available to the Director (the appropriate Ohio EPA District Office or local air agency) upon request.

Each continuous monitoring system consists of all the equipment used to acquire and record data in units of all applicable standard(s), and includes the sample extraction and transport hardware, sample conditioning hardware, analyzers, and data processing hardware and software.

[Authority for term: 40 CFR 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 64]

- (2) The permittee shall operate and maintain the continuous opacity monitoring system to continuously monitor and record the opacity of the particulate emissions from this emissions unit. The continuous monitoring and recording equipment shall comply with the requirements specified in 40 CFR Part 60.

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

- a. percent opacity on an instantaneous (one-minute) and 6-minute block average basis;
- b. results of daily zero/span calibration checks and the magnitude of manual calibration adjustments;
- c. hours of operation of the emissions unit, continuous opacity monitoring system, and control equipment;
- d. the date, time, and hours of operation of the emissions unit without the control equipment and/or the continuous opacity monitoring system;
- e. the date, time, and hours of operation of the emissions unit during any malfunction of the control equipment and/or the continuous opacity monitoring system; as well as,
- f. the reason (if known) and the corrective actions taken (if any) for each such event in (d) and (e).

[Authority for term: 40 CFR 60.13, 40 CFR Part 60, Appendix B, and 40 CFR Part 64]



- (3) The CAM plan for this emissions unit has been developed for particulate emissions. The CAM performance indicators for particulate emissions are the opacity of visible particulate emissions from the baghouse exhaust stack.

Stack opacity is measured and recorded by the certified continuous opacity monitoring (COM) system. The visible particulate emissions indicator range is each 6-minute block average with an opacity action level value greater than 10%. When the opacity value is greater than 10%, corrective action (including, but not limited to, an evaluation of the emissions unit, the COM system and the baghouse) will be required.

The ranges for normal operation are:

<u>Parameter</u>	<u>Indicator Range</u>
Opacity	≤10%

Upon detecting an excursion of the visible particulate emission value above 10% opacity, the owner or operator shall restore operation of the emissions unit (including the control device) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion. Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by the computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range.

If a determination is made by the Administrator or Ohio EPA that the permittee has not used acceptable procedures in response to an excursion or exceedance based on the results of a determination made under 40 CFR Part 64.7(d)(2), the permittee may be required to develop a Quality Improvement Plan (QIP) consistent with the requirements of 40 CFR Part 64.8.

[Authority for term: OAC rule 3745-77-07(C)(1) and 40 CFR Part 64]

- (4) Where demonstrating compliance with an opacity limit using a continuous opacity monitoring system (COMS), it shall be installed, operated, and certified according to the procedures specified in 40 CFR 63.7525(c), 40 CFR 63.8, and Performance Specification 1 from Appendix B to 40 CFR Part 60. Performance evaluations of the COMS shall be conducted according to Performance Specification 1 and 40 CFR 63.8(e). The COMS must complete a minimum of 1 cycle of sampling and analyzing for each successive 10-second period and 1 cycle of data recording for each successive 6-minute period. The data must be reduced to 6-minute averages calculated from 36 or more data points equally spaced over each 6-minute period, as specified in 40 CFR 63.8(g)(2), and the daily block average shall be calculated. The site-specific monitoring plan must include procedures and acceptance criteria for operating and maintaining each COMS, including at a minimum a daily calibration drift assessment, a quarterly performance audit, and an annual zero alignment audit. Records shall be maintained for all periods when the COMS is out of control (a deviation from the monitoring



requirements), including any periods the COMS fails to pass a daily calibration drift assessment, quarterly performance audit, or annual zero alignment audit.

[Authority for term: 40 CFR 63.7525(c), 40 CFR 63.8 and 40 CFR Part 63, Subpart DDDDD, Table 8 #1]

- (5) The permittee shall maintain monthly records of the total quantity of coal received and the results of the analyses for sulfur content and heat content and the calculated SO2 emission rate (in lbs/mmBtu) based upon a volume-weighted average of the calculated SO2 emission rates for all shipments of coal during a calendar month.

The coal supplier shall collect weekly composite samples of the dedicated coal pile for shipment to the permittee for burning in this emissions unit. A sufficient number of individual samples shall be collected so that each composite sample is representative of the average quality of coal to be delivered to the permittee to be burned in this emissions unit during each week. The coal supplier shall also compile a monthly composite sample from the weekly samples. The coal sampling shall be performed in accordance with ASTM method D2234, Collection of a Gross Sample of Coal.

Each monthly composite sample of coal shall be analyzed for sulfur content (percent) and heat content (Btu/pound of coal). The permittee shall perform or require the supplier to perform the analyses for sulfur content and heat content in accordance with the most recent version of the following ASTM methods: ASTM method D3177, Total Sulfur in the Analysis Sample of Coal and Coke or ASTM method D4239, Sulfur in the Analysis Sample of Coal and Coke Using High Temperature Tube Furnace Combustion Methods; and ASTM method D5865, Gross Calorific Value of Coal and Coke, respectively. Alternative, equivalent methods may be used upon written approval from the Ohio EPA, Southeast District Office.

- (6) The permittee shall comply with the applicable monitoring and record keeping requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7525	monitoring, installation, operating, and maintenance requirements
63.7535, 63.7540, and Table 8 to Subpart DDDDD	requirements for monitoring data and continuous compliance demonstration
63.7555	required overall records to be maintained
63.7560	record format and retention requirements

[Authority for term: 40 CFR Part 63, Subpart DDDDD]



e) Reporting Requirements

- (1) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(B)(2) and OAC rule 3745-15-03(D)]

- (2) The permittee shall comply with the applicable reporting requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

Table with 2 columns: Regulatory Reference and Description. Row 1: 63.7530(d)-(g) and 63.7545, Notification of Compliance Status requirements. Row 2: 63.7550 and Table 9 to Subpart DDDDD, content and submission of compliance reports.

[Authority for term: OAC rule 3745-77-07(C)(1), 3745-31-05(A)(3) and 40 CFR Part 63, Subpart DDDDD]

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:

Visible emissions shall not exceed 10% opacity as a daily block average.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: 40 CFR Part 60, Appendix A, Method 9]

b. Emission Limitation:

SO2 emissions shall not exceed 4.6 lbs/mmBtu actual heat input.

Applicable Compliance Method:

Compliance may be determined using the fuel analysis records required pursuant to d)(4) and the applicable equation in OAC rule 3745-18-04(F).

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

[Authority for term: OAC rule 3745-18-85(E)]



c. Emission Limitations:

The emissions from the boiler(s) shall not exceed the following emission limitations, except during startup and shutdown, as identified in the most recent amendment to 40 CFR Part 63, Subpart DDDDD, and as identified in:

Table 2 for existing units:

4.0E-02 lb of filterable particulate matter (PM)/MMBtu of heat input†; or

5.3E-05 lb or Total Selected Metals (TSM)/MMBtu of heat input; and

2.2E-02 lb of hydrogen chloride (HCl)/MMBtu of heat input; and

5.7E-06 lb of mercury (Hg)/MMBtu of heat input; and

160 ppm carbon monoxide (CO) by volume on a dry basis, corrected to 3% O₂, 3-run average; or

Applicable Compliance Method:

For existing boilers, the permittee shall conduct an initial performance test on or before 7/29/16 to demonstrate compliance with the requirements of 40 CFR Part 63, Subpart DDDDD. The appropriate tests methods from Table 5 to Subpart DDDDD shall be conducted while establishing operating limits in accordance with Table 7 to the subpart. Boilers equipped with CEMS for Hg are exempt from the performance testing requirements for Hg and the sorbent or carbon injection operating limits for a dry scrubber if meeting the performance evaluation and certification requirements for Hg CEMS and 40 CFR 63.7540(a)(14). Boilers equipped with CEMS for HCl are exempt from the performance testing requirements for HCl and the effluent pH and liquid flow rate operating limits for a wet acid gas scrubber if meeting the performance evaluation and certification requirements for HCl CEMS and 40 CFR 63.7540(a)(15).

Performance testing must be conducted on an annual basis in accordance with 40 CFR 63.7520 and completed no more than 13 months after the previous performance test. If after 2 consecutive years the emissions of a pollutant identified in Table 2 are at or below 75% of the emissions limit for that pollutant and there have been no changes in the operation of the boiler or air pollution control equipment that could increase emissions, performance testing may revert to every 3 years, or no more than 37 months after the previous test, for the pollutant. If the pollutant exceeds 75% of the applicable limit, testing shall revert back to annually, until the performance tests over another consecutive 2-year period have demonstrated the emissions to be at or below 75% of the applicable emission limit identified in Table 2. For each existing boiler in which compliance is demonstrated through emissions averaging, performance testing shall remain annually. The average operating load must be recorded during each performance test.



Following an initial compliant performance test with the emission limits in Table 2, further performance tests are not required for a boiler designed to burn light liquid fuels and that only burns ultra-low sulfur liquid fuel, if the fuel is monitored and monthly records can demonstrate that only ultra-low sulfur liquid fuel is burned in the boiler.

Performance testing is not required for boilers designed to burn gas 1 fuels subcategory, where monthly records can document the fuel usage and that it meets the specifications of "gas 1 fuel". Following the compliance test date, a performance test must be conducted for each new fuel not meeting the specifications of "gas 1 fuel" within 60 days of first burning it.

If an affected boiler and a non-affected unit(s) vent(s) to a common stack, the non-affected unit(s) must be shut down or vented to a different stack during the performance test, unless compliance can be demonstrated with the non-affected units venting to the stack during the performance demonstration.

The following test method(s) shall be employed, in accordance with Table 5 to Subpart DDDDD, to demonstrate compliance with the allowable mass emission rate(s)*:

Method 1, Appendix A-1, Part 60 to select the sampling ports locations and number of traverse points;

Method 2, 2F, or 2G, Appendix A-1 or A-2, Part 60 to determine the velocity and volumetric flow-rate of the stack gases;

Method 3A or 3B, Appendix A-2, Part 60, or ANSI/ASME PTC19.10 to determine the oxygen and/or carbon dioxide concentrations, excess air, and dry molecular weight of the stack gases; or

Performance Specification 3, Appendix B of 40 CFR Part 60 for O₂ or CO₂ CEMS;

Method 4, Appendix A-3, Part 60 to measure the moisture content of the stack gases;

Method 5 (positive pressure fabric filters shall use Method 5D) or 17 Appendix A-3 or A-6, Part 60 for PM emission concentration;

Method 7, 7A, 7C, 7D, or 7E, Appendix A, Part 60, as appropriate, if subject to OAC 3745-110, the NO_x RACT;

Method 10 Appendix A-4, Part 60 to measure the CO emission concentration; or

Performance Specification 4, 4A, or 4B, Appendix B of 40 CFR Part 60 for CO CEMS, and Performance Specification 3, Appendix B of 40 CFR Part 60 for O₂ CEMS and compliance with 40 CFR 63.7525(a) and 40 CFR 63.7540(a)(8)***;



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Method 26 or 26A, Appendix A-8, Part 60 to measure HCl emissions concentrations; or

Performance Specification 15, Appendix B of 40 CFR Part 60 for HCl CEMS and compliance with 40 CFR 63.7525(l) and 40 CFR 63.7540(a)(15)**;

Method 29 Appendix A-8, Part 60 for the TSM emission concentration;

Method 29, 30A, or 30B, Appendix A-8, Part 60; or Method 101A in Appendix B to Part 61; or ASTM Method D6784 for the Hg emission concentration; or

Performance Specification 12A, Appendix B of 40 CFR Part 60 for Hg CEMS and compliance with 40 CFR 63.7525(l) and 40 CFR 63.7540(a)(14)**;

Method 19 F-factor methodology, Appendix A-7 to Part 60 to convert PM, HCl, Hg, and TSM concentrations to pound per MMBtu emission rates; and

COMS data shall be reduced to 6-minute averages over the duration of the mass emission performance test, where compliance with the opacity limitation is met by using COMS data.

* Except for 30-day rolling averages based on CEMS (or sorbent trap systems), if measurement results for any pollutant are reported as below the analytical method's detection level, the method detection level shall be used as the measured emission level in calculating compliance (40 CFR 63.7520(f)).

** Per 40 CFR 63.7510(b), boilers using Hg and/or HCl CEMS are not required to have a performance test conducted for Hg and/or HCl and are not subject to the operating limit requirements for Hg and/or HCl, if the meet the requirements of 40 CFR 63.7525(l) and 40 CFR 63.7540(a)(14) for Hg and/or 40 CFR 63.7540(a)(15) for HCl.

*** Per 40 CFR 63.7515(i), boilers using CO and O₂ CEMS are not required to have a performance test conducted for CO and are not subject to the oxygen concentration operating limit if the CEMS meet the requirements of 40 CFR 63.7525(a) and 40 CFR 63.7540(a)(8).

Sampling sites shall be located after the control device and prior to any releases to the atmosphere.

a. To determine compliance with the emission limitations from Subpart DDDDD, the F-Factor methodology and equations in sections 12.2 and 12.3 of EPA Method 19 of Appendix A to part 60 shall be used to convert the measured PM or TSM, HCl, and Hg concentrations from the performance test, to pounds per million Btu heat input emission rates.



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b. Each performance test shall consist of 3 separate runs as specified in 40 CFR 63.7(e)(3), using the applicable test methods in Table 5. Each test run shall last at least one hour and shall be conducted under the conditions specified in Tables 5 and 7, and must meet the minimum sampling times and volumes specified in the last column of Table 2 for existing boilers.

c. During each performance test the maximum operating load shall be established by collecting the operating load or steam generation data every 15 minutes during the entire performance test. The average operating load shall be computed from the hourly averages using all of the 15-minute readings taken during each performance test. The maximum operating load shall be calculated as the average of the 3 test runs established during the most recent performance tests multiplied by 1.1 (110%).

d. The performance tests shall be conducted while the boiler is operating at representative operating load conditions, while burning the mixture(s) of fuel containing the highest content of Cl, Hg, and TSM if complying with the alternative standard for PM. These requirements could result in the need to conduct more than one performance test. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of the performance test. The permittee shall make available to the Ohio EPA, Division of Air Pollution Control, Central Office or the appropriate District Office or local air agency, upon request, any records that may be necessary to determine the conditions of the performance tests.

e. In order to establish the site-specific operating limits as required by 40 CFR 63.7530(b)(4) and Table 4 to Subpart DDDDD, the permittee shall collect and record the appropriate parameters for the control device, in accordance with Table 7 to the subpart, every 15 minutes during each performance test. The minimum operating parameters shall be established as follows:

i. When conducting a compliance demonstration for PM or TSM, or Hg and using a wet PM scrubber, the permittee shall collect and record the scrubber pressure drop and liquid flow-rate data every 15 minutes during the entire period of the performance tests and compute the hourly averages using all of the 15-minute readings taken during each performance test. The minimum scrubber pressure drop and minimum liquid flow rate shall be determined based on the lowest hourly average scrubber pressure drop and lowest hourly average liquid flow rate measured during the most recent performance tests demonstrating compliance; and shall be established as the minimum operating parameters for the wet scrubber.

ii. When conducting a compliance demonstration for PM or TSM, or Hg and using an electrostatic precipitator, the permittee shall collect and record the secondary voltage and secondary amperage for each ESP cell, calculate the total secondary electric power input data every 15 minutes during the entire period of the performance tests, and compute the hourly averages using all of the 15-minute readings taken during each performance test. The minimum total secondary electric power shall be



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determined based on the lowest hourly average total secondary electric power input measured during the most recent performance tests demonstrating compliance; and shall be established as the minimum operating parameter for the ESP.

iii. When conducting a compliance demonstration for HCl and using a wet scrubber, the permittee shall collect and record the pH and liquid flow-rate data every 15 minutes during the entire period of the performance tests, and compute the hourly averages using all of the 15-minute readings taken during each performance test. The minimum scrubber effluent pH and minimum scrubber liquid flow rate shall be determined based on the lowest hourly average sorbent liquid pH measured at the inlet to the wet scrubber and the lowest hourly liquid flow rate measured during the most recent performance tests demonstrating compliance with the HCl limit; and shall be established as the minimum operating parameters for the wet scrubber.

iv. When conducting a compliance demonstration for HCl and using a dry scrubber, the permittee shall collect and record the sorbent injection rate data every 15 minutes during the entire period of the performance tests, and compute the hourly averages using all of the 15-minute readings taken during each performance test. The minimum sorbent injection rate shall be determined based on the lowest hourly average sorbent injection rate measured during the most recent performance tests demonstrating compliance with the HCl limit; and shall be established as the minimum operating parameters for the dry scrubber at the load fraction maintained during the performance test. When operating at lower loads, the minimum sorbent injection rate shall be determined by multiplying the sorbent injection rate operating limit established during the performance test by the operating load fraction of the boiler.

v. When conducting a compliance demonstration for Hg and using a dry scrubber with activated carbon injection, the permittee shall collect and record the activated carbon injection rate data every 15 minutes during the entire period of the performance tests, and compute the hourly averages using all of the 15-minute readings taken during each performance test. The minimum activated carbon injection rate shall be determined based on the lowest hourly average activated carbon injection rate measured during the most recent performance tests demonstrating compliance with the Hg limit; and shall be established as the minimum operating parameters for the dry scrubber at the load fraction maintained during the performance test. When operating at lower loads, the minimum activated carbon injection rate shall be determined by multiplying the sorbent injection rate operating limit established during the performance test by the operating load fraction of the boiler.

vi. For boilers equipped with either a wet scrubber or dry sorbent injection system and subject to an HCl emission limit, and where choosing to establish an operating limit using SO₂ CEMS, the permittee shall establish



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the unit-specific maximum SO₂ operating limit by continuously monitoring SO₂ and calculating the hourly average SO₂ emission rate during the 3-run performance test for HCl. The maximum SO₂ operating limit shall be equal to the highest hourly average SO₂ concentration measured during the HCl performance test; and the CEMS data shall be calculated on a 30-day rolling average basis to demonstrate compliance with this maximum concentration. On-going quality assurance shall be established by meeting the daily, quarterly, semiannual and/or annual requirements of Part 75, Appendix B, Sections 2.1 through 2.3; and linearity checks (required in Section 2.2) must be performed if the SO₂ CEMS has a span value of 30 ppm or less. The performance evaluation, using Performance Specification 2, shall be conducted no later than 180 days following the applicable compliance date, or by 7/29/16 for existing boilers, and within 180 days following startup of an existing boiler starting operations following the compliance date, where the boiler has not been in operation.

vii. Where demonstrating compliance with a CO limit, the minimum oxygen level operating limit shall be established as the lowest hourly average measured during the most recent performance test demonstrating compliance with the CO limit.

f. If using a wet scrubber and conducting separate performance tests for HCl and Hg emissions, one set of minimum scrubber effluent pH, liquid flowrate, and pressure drop operating limits shall be established. The minimum scrubber effluent pH operating limit shall be established during the HCl performance test; and the minimum liquid flowrate operating limit shall be set at the higher of the minimum values established during the performance tests.

g. The permittee shall notify the appropriate Ohio EPA, Division of Air Pollution Control, District Office or local air agency in writing and at least 60 calendar days before a performance test is initially scheduled to begin, of plans to conduct a performance test. If a performance evaluation of the COMS or CEMS is to be conducted at the same time, the Division of Air Pollution Control's Central Office shall also be notified. The "Intent to Test" notification shall describe in detail the proposed test methods and procedures, the monitored 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 Division of Air Pollution Control's refusal to accept the results of the emission test(s).

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

i. 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 shall be submitted



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to the appropriate Ohio EPA, Division of Air Pollution Control, District Office or local air agency within 30 days following completion of the test(s).

j. In the event the permittee is unable to conduct the performance test on the date specified in the notification requirement due to unforeseeable circumstances beyond control, the permittee shall notify the appropriate Ohio EPA, Division of Air Pollution Control, District Office or local air agency as soon as practicable and without delay prior to the scheduled performance test date and specify the date when the performance test is rescheduled. This notification of delay in conducting the performance test shall not relieve the permittee of legal responsibility for compliance with any other applicable provisions of this part or with any other applicable federal, State, or local requirement.

k. The permittee shall maintain performance test results and any other data needed to determine emissions from each emissions unit for a minimum of 5 years after the testing is conducted or after the data is collected. These records shall be made available for inspection by the Director of the Ohio EPA or his/her representative, upon request.

[Authority for term: 40 CFR 63.7520, 40 CFR 63.7500(a), 40 CFR 63.7510, 40 CFR 63.7515, 40 CFR 63.7522(j)(2), 40 CFR 63.7525(l)(8) and (m), 40 CFR 63.7530(a), (b)(4)(i), (iv) through (ix), (h), and (i), 40 CFR 63.7545(d), 40 CFR 63, Subpart DDDDD Tables 4, 5, 7, and 8; for the Table 2 limits, 40 CFR 63.6(h)(7)(iii), 40 CFR 63.7, 40 CFR 63.10(d), OAC chapter 3745-110 and OAC rule 3745-15-04(A)]

- (2) The permittee shall comply with the applicable testing requirements required under 40 CFR Part 63, Subpart DDDDD, including the following sections:

63.7510, 63.7530, and Tables 5, 6, and 7 of Subpart DDDDD	initial compliance requirements
63.7515	requirements for subsequent performance tests, fuel analyses, and tune-ups
63.7520, 63.7521 and Tables 5 and 6 to Subpart DDDDD	stack test and fuel analysis procedures
63.7540 and Table 8 to Subpart DDDDD	continuous compliance requirements

[Authority for term: OAC rule 3745-77-07(C)(1), OAC rule 3745-31-05(A)(3) and 40 CFR Part 63, Subpart DDDDD]

- g) Miscellaneous Requirements

- (1) None.



2. B005, Gas Turbine

Operations, Property and/or Equipment Description:

Westinghouse Model W-191 natural gas-fired stationary combustion turbine, with a maximum heat input of 252 MMBtu/hour, installed on 09/01/1992

- 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.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (as established in PTI P0118408, issued 02/13/2015)	Particulate emissions (PE) shall not exceed 0.0019 lb/MMBtu actual heat input; and PE shall not exceed 0.18 tons per rolling 12-month period. Nitrogen oxides (NO _x) emissions shall not exceed 0.35 lb/MMBtu actual heat input; and NO _x emissions shall not exceed 33.34 tons per rolling 12-month period. Sulfur dioxide (SO ₂) emissions shall not exceed 0.0034 lb/MMBtu actual heat input; and SO ₂ emissions shall not exceed 0.32 ton per rolling 12-month period. Carbon monoxide (CO) emissions shall not exceed 0.082 lb/MMBtu actual heat input; and CO emissions shall not exceed 7.81 tons per rolling 12-month period.



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	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		<p>Volatile organic compound (VOC) emissions shall not exceed 0.0021 lb/MMBtu actual heat input; and</p> <p>VOC emissions shall not exceed 0.20 ton per rolling, 12-month period.</p> <p>Compliance with this rule also includes compliance with OAC rules 3745-17-07(A) and 3745-18-06(F).</p>
b.	OAC rule 3745-17-07(A)	Visible PE shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-11(B)(4)	The PE limitation required by this applicable rule (0.040 lb/MMBtu) is less stringent than the PE limitation specified pursuant to OAC rule 3745-31-05(A)(3).
d.	OAC rule 3745-18-06(F)	The SO ₂ emission limitation required by this applicable rule (0.5 lb/MMBtu) is less stringent than the SO ₂ emission limitation specified pursuant to OAC rule 3745-31-05(A)(3).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall only burn natural gas in this emissions unit.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

(2) This emissions unit is limited to 756 hours of operation per rolling, 12-month period.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain the following monthly records for this emissions unit:

a. the total hours of operation for each month; and

b. the rolling, 12-month summation of the hours of operation.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)]



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

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports to the Ohio EPA, Southeast District Office that identify all 12-month periods that exceeded the 756-hour operational restriction. The deviation reports shall be submitted in accordance with the General Term and Condition of A.1.c.ii.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)]

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

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)]

- (3) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(B)(2), OAC rule 3745-15-03(D) and OAC rule 3745-77-07(C)]

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 Limitations:

PE shall not exceed 0.0019 lb/MMBtu actual heat input.

PE shall not exceed 0.18 ton per rolling, 12-month period.

Applicable Compliance Methods:

Compliance with the short-term emission limitation shall be based upon an emission factor of 0.0019 lb/MMBtu. This emission factor is specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emissions Factors, Section 3.1, Table 3.1-2a (04/2000).

If required, PE shall be demonstrated in accordance with the methods and procedures specified in test Methods 1 through 5, as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.



The tpy emission limitation was established utilizing the following calculation:

$$[(\text{PE Emission Factor lb/MMBtu of actual heat input} \times \text{Maximum heat input MMBtu/hour}) \times \text{Maximum hours operating/year}] / 2000 \text{ pounds/ton}$$

where:

PE emissions factor = 0.0019 pound/MMBtu actual heat input;

Maximum heat input = 252 MMBtu/hour; and

Maximum hours operating = 756 hours/year.

Therefore:

$$[(0.0019 \text{ lb/MMBtu} \times 252 \text{ MMBtu/hr}) \times 756 \text{ hours/year}] / 2000 \text{ pounds/ton} = 0.18 \text{ ton per rolling, 12-month period.}$$

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)]

b. Emission Limitations:

NO_x emissions shall not exceed 0.35 lb/MMBtu actual heat input.

NO_x emissions shall not exceed 33.34 tons per rolling, 12-month period.

Applicable Compliance Methods:

Compliance with the NO_x short-term emission limitation may be based upon an emission factor of 0.35 lb/MMBtu. This emissions factor was established during the compliance demonstration performed on April 17, 1995.

If required, NO_x emissions shall be demonstrated in accordance with the methods and procedures specified in test Methods 1 through 4 and Method 7 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

The tpy emission limitation was established utilizing the following calculation:

$$[(\text{NO}_x \text{ Emission Factor lb/MMBtu of actual heat input} \times \text{Maximum heat input MMBtu/hour}) \times \text{Maximum hours operating/year}] / 2000 \text{ pounds/ton}$$

where:

NO_x emissions factor = 0.35 pound/MMBtu actual heat input;

Maximum heat input = 252 MMBtu/hour; and

Maximum hours operating = 756 hours/year.



Therefore:

$[(0.35 \text{ lb/MMBtu} \times 252 \text{ MMBtu/hr}) \times 756 \text{ hours/year}] / 2000 \text{ pounds/ton} = 33.34 \text{ tons per rolling, 12-month period.}$

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)]

c. Emission Limitations:

SO₂ emissions shall not exceed 0.0034 lb/MMBtu actual heat input.

SO₂ emissions shall not exceed 0.32 ton per rolling, 12-month period.

Applicable Compliance Methods:

Compliance may be based upon an emission factor of 0.0034 lb/MMBtu. This emission factor was specified in AP-42, Fifth Edition, Compilation of Air Pollution Emissions Factors, Section 3.1, Table 3.1-2a (04/2000).

If required, SO₂ emissions shall be demonstrated in accordance with the methods and procedures specified in test Methods 1 through 4 and Method 6 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

The tpy emission limitation was established utilizing the following calculation:

$[(\text{SO}_2 \text{ Emission Factor lb/MMBtu of actual heat input} \times \text{Maximum heat input MMBtu/hour}) \times \text{Maximum hours operating/year}] / 2000 \text{ pounds/ton}$

where:

SO₂ emission factor = 0.0034 pound/MMBtu actual heat input;

Maximum heat input = 252 MMBtu/hour; and

Maximum hours operating = 756 hours/year.

Therefore:

$[(0.0034 \text{ lb/MMBtu} \times 252 \text{ MMBtu/hr}) \times 756 \text{ hours/year}] / 2000 \text{ pounds/ton} = 0.32 \text{ ton per rolling, 12-month period.}$

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)]

d. Emission Limitations:

CO emissions shall not exceed 0.082 lb/MMBtu actual heat input.

CO emissions shall not exceed 7.81 tons per rolling, 12-month period.



Applicable Compliance Methods:

Compliance may be based upon an emission factor of 0.082 lb/MMBtu. This emission factor was specified in AP-42, Fifth Edition, Compilation of Air Pollution Emissions Factors, Section 3.1, Table 3.1-1 (04/2000).

If required, CO emissions shall be demonstrated in accordance with the methods and procedures specified in test Methods 1 through 4 and Method 10 as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

The tpy emission limitation was established utilizing the following calculation:

$$[(\text{CO Emission Factor lb/MMBtu of actual heat input} \times \text{Maximum heat input MMBtu/hour}) \times \text{Maximum hours operating/year}] / 2000 \text{ pounds/ton}$$

where:

CO emissions factor = 0.082 pound/MMBtu actual heat input;

Maximum heat input = 252 MMBtu/hour; and

Maximum hours operating = 756 hours/year.

Therefore:

$$[(0.082 \text{ lb/MMBtu} \times 252 \text{ MMBtu/hr}) \times 756 \text{ hours/year}] / 2000 \text{ pounds/ton} = 7.81 \text{ tons per rolling, 12-month period.}$$

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)]

e. Emission Limitations:

VOC emissions shall not exceed 0.0021 lb/MMBtu actual heat input.

VOC emissions shall not exceed 0.20 ton per rolling, 12-month period.

Applicable Compliance Methods:

Compliance may be based upon an emission factor of 0.0021 lb/MMBtu. This emission factor was specified in AP-42, Fifth Edition, Compilation of Air Pollution Emissions Factors, Section 3.1, Table 3.1-2a (04/2000).

If required, VOC emissions shall be demonstrated in accordance with the methods and procedures specified in test Methods 1 through 4 and Method 18, 25, or 25A as set forth in the "Appendix on Test Methods" in 40 CFR, Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office. [OAC rule 3745-31-05(A)(3)].



The tpy emission limitation was established utilizing the following calculation:

$[(\text{VOC Emission Factor lb/MMBtu of actual heat input} \times \text{Maximum heat input MMBtu/hour}) \times \text{Maximum hours operating/year}] / 2000 \text{ pounds/ton}$

where:

VOC emission factor = 0.0021 pound/MMBtu actual heat input;

Maximum heat input = 252 MMBtu/hour; and

Maximum hours operating = 756 hours/year.

Therefore:

$[(0.0021 \text{ lb/MMBtu} \times 252 \text{ MMBtu/hr}) \times 756 \text{ hours/year}] / 2000 \text{ pounds/ton} = 0.20$
ton per rolling, 12-month period.

[Authority for term: OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)]

f. Emission Limitation:

Visible PE shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rule 3745-17-07(A), OAC rule 3745-31-05(A)(3) and OAC rule 3745-77-07(C)]

g) Miscellaneous Requirements

- (1) None.



3. B007, Gas Compressor

Operations, Property and/or Equipment Description:

Model VLROU natural gas-fired internal combustion engine, having a maximum heat input of 4.86 MMBtu/hour, installed 09/01/1992

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.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(D) (as established in PTI P0117890, issued 11/03/2014)	Particulate emissions (PE) shall not exceed 5.91 tons per rolling, 12-month period. See c)(1) and c)(2). Compliance with this rule also includes compliance with OAC rules 3745-17-07(A) and 3745-17-11(B)(5)b).
b.	OAC rule 3745-17-07(A)	Visible PE from any stack shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
c.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/MMBtu actual heat input.
d.	OAC rule 3745-18-06(G)	Exempt pursuant to OAC rule 3745-18-06(B).

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The permittee shall burn only natural gas in this emissions unit.

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(A)(1)]



- (2) This emissions unit is limited to 756 hours of operation per rolling, 12-month period.

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

- (1) The permittee shall maintain the following monthly records for this emissions unit:

- a. the total hours of operation for each month; and
- b. the rolling, 12-month summation of the hours of operation.

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports to the Ohio EPA, Southeast District Office that identify all 12-month periods that exceed the 756 operational restriction. The deviation reports shall be submitted in accordance with the General Term and Condition A.1.c)(ii).

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

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

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

- (3) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(B)(2), OAC rule 3745-15-03(D) and OAC rule 3745-77-07(C)(1)]

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:

PE shall not exceed 5.91 tons per rolling, 12-month period.



Applicable Compliance Method:

The emission limitation was established utilizing the following calculation:

$$[(PE \text{ Emission Factor lb/MMBtu of actual heat input} \times \text{Maximum heat input MMBtu/hour}) \times \text{Maximum hours operating/year}] / 2000 \text{ pounds/ ton}$$

where:

PE emissions factor = 0.062 pound/MMBtu actual heat input;

Maximum heat input = 252 MMBtu/hour; and

Maximum hours operating = 756 hours/year.

Therefore:

$$[(0.062 \text{ lb/MMBtu} \times 252 \text{ MMBtu/hr}) \times 756 \text{ hours/year}] / 2000 \text{ pounds/ton} = 5.91 \text{ tons per rolling, 12-month period.}$$

[Authority for term: OAC rule 3745-31-05(D) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

Visible PE shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority for term: OAC rule 3745-17-07(A) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

PE shall not exceed 0.062 lb/MMBtu actual heat input.

Applicable Compliance Method:

If required, PE shall be demonstrated in accordance with the methods and procedures specified in test Methods 1 through 5, as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

[Authority for term: OAC rule 3745-17-11(B)(5)(b) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

- (1) None.



4. B008, Diesel Generator

Operations, Property and/or Equipment Description:

Fairbanks Morse Model #3800TD8-1/8 stationary large bore internal combustion diesel generator, having a maximum heat input of 19.5 MMBtu/hr, installed on 06/01/1965

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.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-17-07(A)	Visible particulate emissions (PE) shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
b.	OAC rule 3745-17-11(B)(5)(b)	PE shall not exceed 0.062 lb/MMBtu actual heat input.
c.	OAC rule 3745-18-06(G)	Sulfur dioxide (SO ₂) emissions shall not exceed 0.5 lb/MMBtu actual heat input.

(2) Additional Terms and Conditions

a. None.

c) Operational Restrictions

(1) The quality of the oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable SO₂ emission limitation specified in b)(1)c.

[Authority for term: OAC rule 3745-18-06(G) and OAC rule 3745-77-07(A)(1)]

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain records of the oil burned in this emissions unit in accordance with either Alternative 1 or Alternative 2 as 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 SO₂ emission rate (in lbs/MMBtu). The SO₂ emissions 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, and the quality of the oil for those loads 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 SO₂ emissions rate (in lbs/MMBtu). The SO₂ emissions rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).

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

- (2) 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 and D4294), or equivalent methods as approved by the Director.

[Authority for term: OAC rule 3745-18-06(G) and OAC rule 3745-77-07(C)(1)]

- (3) For each day during which the permittee burns a fuel other than diesel fuel, 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(C)(1)]

e) Reporting Requirements

- (1) The permittee shall notify the Director (the Ohio EPA, Southeast District Office) in writing of any record which shows a deviation of the allowable SO₂ emissions limitation based upon the calculated SO₂ emissions rate from Section d) above. The notification shall include a copy of such record and shall be sent to the Director (the Ohio EPA, Southeast District Office) within 45 days after the deviation occurs.

[Authority for term: OAC rule 3745-18-06(G) and OAC rule 3745-77-07(C)(1)]

- (2) The permittee shall submit deviation (excursion) reports that identify each day when a fuel other than diesel fuel 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(C)(1)]

- (3) The reports required by this permit may be submitted through the Ohio EPA's eBusiness Center: Air Services online web portal.

[Authority for term: OAC rule 3745-15-03(B)(2), OAC rule 3745-15-03(D) and OAC rule 3745-77-07(C)(1)]

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:

Visible PE shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.

Applicable Compliance Method:

If required, compliance shall be demonstrated based upon visible particulate emission observations performed in accordance with the methods and procedures specified in 40 CFR Part 60, Appendix A, Method 9.

[Authority of term: OAC rule 3745-17-07(A) and OAC rule 3745-77-07(C)(1)]

b. Emission Limitation:

PE shall not exceed 0.062 lb/MMBtu actual heat input.

Applicable Compliance Method:

If required, PE shall be demonstrated in accordance with the methods and procedures specified in test Methods 1 through 5, as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

[Authority of term: OAC rule 3745-17-11(B)(5)(b) and OAC rule 3745-77-07(C)(1)]

c. Emission Limitation:

SO₂ emissions shall not exceed 0.5 lb/MMBtu actual heat input.



Preliminary Proposed Title V Permit

Dover Municipal Light Plant

Permit Number: P0090801

Facility ID: 0679010146

Effective Date: To be entered upon final issuance

Applicable Compliance Method:

If required, SO₂ emissions shall be demonstrated in accordance with the methods and procedures specified in test Methods 1 through 4 and Method 6 as set forth in the "Appendix on Test Methods" in 40 CFR Part 60 "Standards of Performance for New Stationary Sources". Alternative U.S. EPA-approved test methods may be used with prior approval from Ohio EPA, Southeast District Office.

[Authority of term: OAC rule 3745-18-06(G) and OAC rule 3745-77-07(C)(1)]

g) Miscellaneous Requirements

(1) None.