



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

11/23/2015

Jim Stice  
 DP&L, Killen Generating Station  
 14869 U.S. Route 52  
 Manchester, OH 45144

RE: DRAFT AIR POLLUTION PERMIT-TO-INSTALL

Facility ID: 0701000060  
 Permit Number: P0119771  
 Permit Type: Administrative Modification  
 County: Adams

Certified Mail

No	TOXIC REVIEW
No	PSD
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
Yes	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MAJOR NON-ATTAINMENT
No	MODELING SUBMITTED
No	MAJOR GHG
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

Dear Permit Holder:

A draft of the Ohio Administrative Code (OAC) Chapter 3745-31 Air Pollution Permit-to-Install for the referenced facility has been issued for the emissions unit(s) listed in the Authorization section of the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the permit. A public notice will appear in the Ohio Environmental Protection Agency (EPA) Weekly Review and the local newspaper, The Peoples Defender. A copy of the public notice and the draft permit are enclosed. This permit can be accessed electronically on the Division of Air Pollution Control (DAPC) Web page, [www.epa.ohio.gov/dapc](http://www.epa.ohio.gov/dapc) by clicking the "Search for Permits" link under the Permitting topic on the Programs tab. Comments will be accepted as a marked-up copy of the draft permit or in narrative format. Any comments must be sent to the following:

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

and Portsmouth City Health Dept., Air Pollution Unit  
 605 Washington Street  
 3rd Floor  
 Portsmouth, OH 45662

Comments and/or a request for a public hearing will be accepted within 30 days of the date the notice is published in the newspaper. You will be notified in writing if a public hearing is scheduled. A decision on issuing a final permit-to-install will be made after consideration of comments received and oral testimony if a public hearing is conducted. Any permit fee that will be due upon issuance of a final Permit-to-Install is indicated in the Authorization section. Please do not submit any payment now. If you have any questions, please contact Portsmouth City Health Dept., Air Pollution Unit at (740)353-5156.

Sincerely,

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

Cc: U.S. EPA Region 5 -Via E-Mail Notification  
 Portsmouth; Kentucky; West Virginia



## Permit Strategy Write-Up

1. Check all that apply:

Synthetic Minor Determination

Netting Determination

2. Source Description:

DP&L, Killen Station operates two auxiliary fire tube boilers identified as B002 and B003 rated at 95.7 mmBTU/hr each, fired with distillate fuel oil and/or biodiesel fuel. This permit is requesting a Chapter 31 modification to qualify these boilers as “limited use boilers” per the National Emissions Standards for Hazardous Air Pollutants for Major sources: Industrial, Commercial, and Institutional Boilers and Process heaters (40 CFR Part 63, Subpart DDDDD). A limited use boiler is defined as a boiler that burns any amount of solid, liquid or gaseous fuels and has federally enforceable annual heat input capacity of no more than 10%. The 10% heat input equates to a maximum of no more than 83,833 mmBtu/year and associated B20 annual restriction of 124,000 gallons for each boiler. This PTI supercedes PTI P0107275 issued for the auxiliary boilers on 2/22/2012.

3. Facility Emissions and Attainment Status:

DP & L, Stuart Station is located in Monroe Township in Adams County, which is classified as attainment for all criteria pollutants. This facility is an existing major stationary source with potential emissions greater than 100 tons per year for Nitrogen Oxides (NO<sub>x</sub>) and Carbon Monoxide (CO), and Volatile Organic Compounds (VOC). The facility is also classified as a major source under the Title V program, due to NAAQS pollutant emissions over 100 tons/yr, and over 10 tons/yr single and 25 tons/yr combined HAPs.

4. Source Emissions:

PTI P0107275, issued 2/22/2012, allowed the addition of biodiesel (B20) as a fuel in the existing auxiliary boilers. PTI P0107275 established a BAT limitation for NO<sub>x</sub> emissions and rule based limitations applied for PM and SO<sub>2</sub>. This Chapter 31 modification is requesting federally enforceable restrictions to qualify the boilers as “limited-use” boilers. The calculations are based on the most recent AP-42 emission factors from Section 1.3 (5/10) for PM and SO<sub>2</sub> and site-specific testing performed in March 2010 for NO<sub>x</sub> along with the annual heat input and fuel restrictions. The rating of each boiler at 95.7 mmBtu/hr times 8760 hours results in 838,332 multiplied by 0.10 equates to 83,833 mmBtu/year for each of the two boilers individually. The rolling 12-month limitations are 0.84 tpy PM/PM10/PM2.5; 1.93 tpy NO<sub>x</sub>; and 67.07 tpy SO<sub>2</sub>.

5. Conclusion:

This Chapter 31 modification does not result in any increase in emissions. The requested restriction to qualify the auxiliary boilers as “limited-use” boilers results in a decrease in annual emissions and is more restrictive than the previous PTI P0107275 issued 2/22/2012. The previous restriction was established in accordance with OAC rule 3745-31-05(E) as a voluntary restriction to avoid state modeling. This modification establishes federally enforceable restrictions in accordance with OAC rule 3745-31-05(D) to qualify these boilers as “limited-use” boilers per the boiler MACT Subpart DDDDD.



6. Please provide additional notes or comments as necessary:

None

7. Total Permit Allowable Emissions Summary (for informational purposes only):

<u>Pollutant</u>	<u>Tons Per Year</u>
PM/PM <sub>10</sub> /PM <sub>2.5</sub>	0.84
NO <sub>x</sub>	1.93
SO <sub>2</sub>	67.07

## PUBLIC NOTICE

The following matters are the subject of this public notice by the Ohio Environmental Protection Agency. The complete public notice, including any additional instructions for submitting comments, requesting information, a public hearing, or filing an appeal may be obtained at: <http://epa.ohio.gov/actions.aspx> or Hearing Clerk, Ohio EPA, 50 W. Town St., Columbus, Ohio 43215. Ph: 614-644-2129 email: [HClerk@epa.ohio.gov](mailto:HClerk@epa.ohio.gov)

Draft Air Pollution Permit-to-Install Administrative Modification

DP&L, Killen Generating Station

14869 U.S. Route 52,,Manchester, OH 45144

ID#:P0119771

Date of Action: 11/23/2015

Permit Desc:Administrative modification to request federally enforceable operating restrictions for auxiliary boilers B002 & B003 to establish the boilers as "limited-use boilers" per the NESHAP for 40 CFR Part 63, Subpart DDDDD..

The permit and complete instructions for requesting information or submitting comments may be obtained at: <http://epa.ohio.gov/dapc/permitsonline.aspx> by entering the ID # or: Matt Freeman, Portsmouth City Health Dept., Air Pollution Unit, 605 Washington Street 3rd Floor, Portsmouth, OH 45662. Ph: (740)353-5156





**DRAFT**

**Division of Air Pollution Control  
Permit-to-Install  
for  
DP&L, Killen Generating Station**

Facility ID:	0701000060
Permit Number:	P0119771
Permit Type:	Administrative Modification
Issued:	11/23/2015
Effective:	To be entered upon final issuance





**Division of Air Pollution Control**  
**Permit-to-Install**  
for  
DP&L, Killen Generating Station

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**Draft Permit-to-Install**  
DP&L, Killen Generating Station  
**Permit Number:** P0119771  
**Facility ID:** 0701000060  
**Effective Date:** To be entered upon final issuance

## Authorization

Facility ID: 0701000060  
Facility Description: Electric Generating Station  
Application Number(s): A0054574  
Permit Number: P0119771  
Permit Description: Administrative modification to request federally enforceable operating restrictions for auxiliary boilers B002 & B003 to establish the boilers as "limited-use boilers" per the NESHAP for 40 CFR Part 63, Subpart DDDDD.  
Permit Type: Administrative Modification  
Permit Fee: \$400.00 *DO NOT send payment at this time, subject to change before final issuance*  
Issue Date: 11/23/2015  
Effective Date: To be entered upon final issuance

This document constitutes issuance to:

DP&L, Killen Generating Station  
14869 U.S. Route 52  
Manchester, OH 45144

of a Permit-to-Install for the emissions unit(s) identified on the following page.

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

Portsmouth City Health Dept., Air Pollution Unit  
605 Washington Street  
3rd Floor  
Portsmouth, OH 45662  
(740)353-5156

The above named entity is hereby granted a Permit-to-Install for the emissions unit(s) listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Craig W. Butler  
Director



## Authorization (continued)

Permit Number: P0119771

Permit Description: Administrative modification to request federally enforceable operating restrictions for auxiliary boilers B002 & B003 to establish the boilers as "limited-use boilers" per the NESHAP for 40 CFR Part 63, Subpart DDDDD.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

**Group Name: Auxiliary Boilers**

<b>Emissions Unit ID:</b>	<b>B002</b>
Company Equipment ID:	Auxiliary Boiler A
Superseded Permit Number:	P0107275
General Permit Category and Type:	Not Applicable
<b>Emissions Unit ID:</b>	<b>B003</b>
Company Equipment ID:	Auxiliary Boiler B
Superseded Permit Number:	P0107275
General Permit Category and Type:	Not Applicable



**Draft Permit-to-Install**  
DP&L, Killen Generating Station  
**Permit Number:** P0119771  
**Facility ID:** 0701000060  
**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.2.a), Severability Clause
  - (2) Standard Term and Condition A.3.c) through A. 3.e) General Requirements
  - (3) Standard Term and Condition A.6.c) and A. 6.d), Compliance Requirements
  - (4) Standard Term and Condition A.9., Reporting Requirements
  - (5) Standard Term and Condition A.10., Applicability
  - (6) Standard Term and Condition A.11.b) through A.11.e), Construction of New Source(s) and Authorization to Install
  - (7) Standard Term and Condition A.14., Public Disclosure
  - (8) Standard Term and Condition A.15., Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations
  - (9) Standard Term and Condition A.16., Fees
  - (10) Standard Term and Condition A.17., Permit Transfers

**2. Severability Clause**

- a) 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.
- b) All terms and conditions designated in parts B and C of this permit are federally enforceable as a practical matter, if they 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 and the State and by citizens (to the extent allowed by section 304 of the Act) under the Act. Terms and conditions in parts B and C of this permit shall not be federally enforceable and shall be enforceable under State law only, only if specifically identified in this permit as such.

**3. 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 re-issuance, or modification.

- 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.
- c) This permit may be modified, revoked, or revoked and reissued, for cause. 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 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.

#### **4. 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, 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.
- 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, 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.
- c) Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:
  - (1) Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the Portsmouth City Health Dept., Air Pollution Unit.

- (2) Quarterly written reports of (i) any deviations from federally enforceable emission limitations, operational restrictions, and control device operating parameter limitations, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the Portsmouth City Health Dept., Air Pollution Unit. The written 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. See A.15. below if no deviations occurred during the quarter.
  - (3) Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the Portsmouth City Health Dept., Air Pollution Unit every six months, by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.
  - (4) This permit is for an emissions unit located at a Title V facility. 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 are true, accurate, and complete.
- d) The permittee shall report actual emissions pursuant to OAC Chapter 3745-78 for the purpose of collecting Air Pollution Control Fees.

## 5. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the Portsmouth City Health Dept., Air Pollution Unit in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to 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 emission unit(s) that is (are) served by such control system(s).

## 6. Compliance Requirements

- a) 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 appropriate Ohio EPA District Office or contracted

local air agency, and/or any other individual or organization specifically identified as an additional recipient identified in this permit unless otherwise specified. Consistent with OAC rule 3745-15-03, the electronic signature date shall constitute the date that the required application, notification or report is considered to be "submitted". Any document requiring signature may be represented by entry of the personal identification number (PIN) by responsible official as part of the electronic submission process or by the scanned attestation document signed by the Authorized Representative that is attached to the electronically submitted written report.

Any document (including reports) required to be submitted and required by a federally applicable requirement in this 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 ORC section 3704.08.
  - (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 Portsmouth City Health Dept., Air Pollution Unit 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.

## **7. Best Available Technology**

As specified in OAC Rule 3745-31-05, new sources that must employ Best Available Technology (BAT) shall comply with the Applicable Emission Limitations/Control Measures identified as BAT for each subject emissions unit.

**8. 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.

**9. Reporting Requirements**

The permittee shall submit required reports in the following manner:

- a) Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the Portsmouth City Health Dept., Air Pollution Unit.
- b) Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the Portsmouth City Health Dept., Air Pollution Unit. 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.)

**10. Applicability**

This Permit-to-Install is applicable only to the emissions unit(s) identified in the Permit-to-Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s) not exempt from the requirement to obtain a Permit-to-Install.

**11. Construction of New Sources(s) and Authorization to Install**

- a) This permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. This permit does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the application and terms and conditions of this permit. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of this permit does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Issuance of this permit is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.
- b) If applicable, authorization to install any new emissions unit included in this permit shall terminate within eighteen months of the effective date of the permit if the owner or operator has not undertaken a continuing program of installation or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation. This deadline may be extended by up to 12 months if application is made to the

Director within a reasonable time before the termination date and the permittee shows good cause for any such extension.

- c) The permittee may notify Ohio EPA of any emissions unit that is permanently shut down (i.e., the emissions unit 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) by submitting a certification from the authorized 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 authorized official that the emissions unit was permanently shut down. At a minimum, notification of permanent shut down shall be made or confirmed by marking the affected emissions unit(s) as "permanently shut down" in "Air Services" along with the date the emissions unit(s) was permanently removed and/or disabled. Submitting the facility profile update electronically will constitute notifying the Director of the permanent shutdown of the affected emissions unit(s).
- d) The provisions of this permit shall cease to be enforceable for each affected emissions unit after the date on which an emissions unit is permanently shut down (i.e., emissions unit 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). All records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, must be maintained in accordance with law. All reports required by this permit must be submitted for any period an affected emissions unit operated prior to permanent shut down. At a minimum, the permit requirements must be evaluated as part of the reporting requirements identified in this permit covering the last period the emissions unit operated.

Unless otherwise exempted, no emissions unit certified by the responsible official as being permanently shut down may resume operation without first applying for and obtaining a permit pursuant to OAC Chapter 3745-31 and OAC Chapter 3745-77 if the restarted operation is subject to one or more applicable requirements.

- e) The permittee shall comply with any residual requirements related to this permit, such as the requirement to submit a deviation report, air fee emission report, or other any reporting required by this permit for the period the operating provisions of this permit were enforceable, or as required by regulation or law. All reports shall be submitted in a form and manner prescribed by the Director. All records relating to this permit must be maintained in accordance with law.

## 12. Permit-To-Operate Application

The permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77. The permittee shall submit a complete Title V permit application or a complete Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if operation of the proposed new or modified source(s) as authorized by this permit would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d) must be obtained before operating the source in a manner that would violate the existing Title V permit requirements.

**13. Construction Compliance Certification**

The applicant shall identify the following dates in the "Air Services" facility profile for each new emissions unit identified in this permit.

- a) Completion of initial installation date shall be entered upon completion of construction and prior to start-up.
- b) Commence operation after installation or latest modification date shall be entered within 90 days after commencing operation of the applicable emissions unit.

**14. Public Disclosure**

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

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

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.

**16. Fees**

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable permit-to-install fees within 30 days after the issuance of any permit-to-install. The permittee shall pay all applicable permit-to-operate fees within thirty days of the issuance of the invoice.

**17. Permit Transfers**

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The new owner must update and submit the ownership information via the "Owner/Contact Change" functionality in "Air Services" once the transfer is legally completed. The change must be submitted through "Air Services" within thirty days of the ownership transfer date.

**18. Risk Management Plans**

If the permittee is required to 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"), the permittee shall comply with the requirement to register such a plan.

**19. 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.



**Draft Permit-to-Install**  
DP&L, Killen Generating Station  
**Permit Number:** P0119771  
**Facility ID:** 0701000060  
**Effective Date:** To be entered upon final issuance

## **B. Facility-Wide Terms and Conditions**



**Draft Permit-to-Install**  
DP&L, Killen Generating Station  
**Permit Number:** P0119771  
**Facility ID:** 0701000060

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

1. All the following facility-wide terms and conditions are federally enforceable with the exception of those listed below which are enforceable under state law only:
  - a) None.
2. The following emissions units contained in this permit is subject to 40 CFR Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants from Coal and oil-fired Industrial, Commercial, and Institutional Boilers and Process Heaters: B002 and B003. The complete MACT requirements, including the MACT General Provisions may be accessed via the internet from the Electronic Code of Federal Regulations (e-CFR) website <http://efcr.gpoaccess.gov> or by contacting the Portsmouth Local Air Agency.



**Draft Permit-to-Install**  
DP&L, Killen Generating Station  
**Permit Number:** P0119771  
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## **C. Emissions Unit Terms and Conditions**

**1. Emissions Unit Group -Auxiliary Boilers: B002 & B003**

<b>EU ID</b>	<b>Operations, Property and/or Equipment Description</b>
B002	Babcock and Wilcox distillate oil-fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) auxiliary boiler, having a nominal capacity of 95.7 mmBtu/hr. Auxiliary Boiler A has the capacity to burn B20 (biodiesel based liquid fuel) or less as an alternate to distillate No. 2 fuel oil in all stationary combustion equipment.
B003	Babcock and Wilcox distillate oil-fired (number 1 and number 2 fuel oil, kerosene and diesel fuel, but excluding number 4 fuel oil) auxiliary boiler, having a nominal capacity of 95.7 mmBtu/hr. Auxiliary Boiler B has the capacity to burn B20 (biodiesel based liquid fuel) or less as an alternate to distillate No. 2 fuel oil in all stationary combustion equipment.

Chapter 31 modification to qualify these boilers as “limited-use boilers” per the NESHAP for Major Sources: Industrial, Commercial, Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD). Includes federally enforceable operating restriction to qualify as “limited-use boiler” with an annual capacity factor of no more than 10 percent which equates to a maximum heat input of no more than 83,833 mmBtu/year and associated B20 annual restriction of 124,000 gallons for each boiler. Supersedes PTI P0107275 issued 2/22/2012.

- 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) June 30, 2008	<p><b>While burning biodiesel fuel B20:</b></p> <p>Nitrogen oxides (NO<sub>x</sub>) emissions shall not exceed 0.23 lb/mmBtu actual heat input.</p> <p>See b)(2)a.</p> <p>The requirements of this rule also include compliance with the OAC rules 3745-17-07(A), 3745-17-10(B), and 3745-18-06(D).</p>

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(A)(3) June 30, 2008	The Best Available Technology (BAT) requirements under OAC rule 3745-31-05(A)(3) do not apply to the NO <sub>x</sub> emissions from this air contaminant source since the potential to emit is less than 10 tons/year taking into account the federally enforceable restriction in b(2)c. below.  See b)(2)b.
c.	OAC rule 3745-31-05(D) (Synthetic Minor restriction to qualify as a "limited use boiler" per 40 CFR Part 63, Subpart DDDDD)	PM/PM <sub>10</sub> /PM <sub>2.5</sub> emissions shall not exceed 0.84 ton per rolling, 12-month period.  NO <sub>x</sub> emissions shall not exceed 1.93 tons per rolling, 12-month period.  Sulfur dioxide (SO <sub>2</sub> ) emissions shall not exceed 67.07 tons per rolling, 12-month period.  See b)(2)c and c)(1).
d.	OAC rule 3745-17-10(B)(1)	Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.
e.	OAC rule 3745-17-07(A)(1)	Visible particulate emissions shall not exceed 20% opacity as a 6-minute average, except as provided by the rule.
f.	OAC rule 3745-18-06(D)	SO <sub>2</sub> emissions shall not exceed 1.6 lbs/mmBtu actual heat input.
g.	40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480 – 63.7575)  [In accordance 40 CFR 63.7500(c) this emissions unit is a limited-use boiler subject to the tune-up requirements specified in this section.]	Tune-up requirements specified in Table 3.  [40 CFR 63.7540]  See b)(2)d.
h.	40 CFR 63.1 – 63.16  (40 CFR 63.7565)	Table 10 to Subpart DDDDD of 40 CFR Part 63 – Applicability of General Provisions to Subpart DDDDD shows which parts of the General Provisions in 40 CFR 63.1 – 63.16 apply.

(2) Additional Terms and Conditions

- a. The Best Available Technology (BAT) emission limit applies until U.S. EPA approves Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) into the Ohio State Implementation Plan (SIP).
- b. These requirements apply once U.S. EPA approves OAC paragraph 3745-31-05(A)(3)(a)(ii) (the less than 10 tons per year BAT exemption) as part of the Ohio SIP.
- c. Permit to Install P0119771 for these air contaminant sources takes into account the following federally enforceable restrictions as proposed by the permittee for the purposes of qualifying the auxiliary boilers as “limited-use boilers” per the requirements of 40 CFR Part 63, Subpart DDDDD:
  - i. the maximum annual heat input for this emissions unit shall not exceed 83,833 mmBtu, based upon a rolling, 12-month summation of the monthly heat input values; and
  - ii. restricting the annual amount of biodiesel fuel (B20) burned in this emissions unit to 124,000 gallons per year.
- d. The permittee shall comply with the requirements and limits of 40 CFR Part 63, Subpart DDDDD for the facility’s existing boilers and shall be in compliance with this NESHAP no later than January 31, 2016.
  - i. this emissions unit is identified as limited-use boiler and is not subject to the emission limits in Table 2 of the subpart, the operating limits in Table 4 of the subpart, or the energy assessment requirements in Table 3 of the subpart.
  - ii. the limited-use boiler is subject to 5-year tune-up requirements, conducted in accordance with 40 CFR 63.7540(a)(10)(i) through (vi) and Table 3 to the subpart: Each limited-use boiler identified above shall have a federally enforceable average annual capacity factor of no more than 10%.
- c) Operational Restrictions
  - (1) The quality of oil burned in this emissions unit shall meet a sulfur content that is sufficient to comply with the allowable SO<sub>2</sub> emission limitation specified in b)(1)f above.
  - (2) The permittee shall burn only distillate oil (number 1 and number 2 fuel oil, kerosene and diesel fuel, or a blend of number 2 fuel oil and biodiesel fuel (B20), but excluding number 4 fuel oil) in this emissions unit.
  - (3) The maximum annual heat input for this emissions unit shall not exceed 83,833 mmBtu, based upon a rolling, 12-month summation of the monthly heat input values. The permittee has sufficient records to demonstrate compliance with the annual heat input

limitation upon permit issuance in order to qualify as a "limited use boiler" per 40 CFR Part 63, Subpart DDDDD.

- (4) The maximum annual biodiesel fuel (B20) burned in this emissions unit shall not exceed 124,000 gallons based upon a rolling, 12-month summation of the renewable fuel use.
- (5) The permittee shall perform all maintenance activities as specified per the manufacturer's recommendations. To the extent practicable, the permittee shall maintain and operate the boiler, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.
- (6) The biodiesel content of the fuel burned in this emissions unit shall not exceed 20% by volume.
- (7) See 40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480 – 63.7575).

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

- (1) The permittee shall maintain records of all maintenance activities performed in accordance with manufacturer's recommendations. Maintenance records for B010, B011 and B012 shall be made available to the Portsmouth Local Air Agency upon request.
- (2) The permittee shall maintain monthly records of the following information for these emissions units:
  - a. the monthly fuel usage of biodiesel and/or No. 2 fuel oil for B002 and B003, in gallons;
  - b. the monthly heat input rate for B002 and B003, in mmBtu (calculated by multiplying d)(2)a by the oil heating value of biodiesel and/or No. 2 fuel oil); and
  - c. the rolling, 12-month summation of the monthly heat input rates and fuel usage of biodiesel for B002 and B003 (in mmBtu).
- (3) For each shipment of oil received for burning in these emissions units, the permittee shall maintain records of the total quantity of oil received, the permittee's or oil supplier's analysis for sulfur content and heat content, and the calculated SO<sub>2</sub> emission rate (in lbs/mmBtu). (The SO<sub>2</sub> emission rate shall be calculated in accordance with the formula specified in OAC rule 3745-18-04(F).) A shipment may be comprised of multiple tank truck loads from the same supplier's batch, or may be represented by single or multiple pipeline deliveries from the same supplier's batch, and the quality of the oil for those loads may be represented by a single batch analysis from the supplier.
- (4) 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.

- (5) For each day during which the permittee burns a prohibited fuel (i.e., other than distillate oil as defined in c)(2) above), the permittee shall maintain a record of the type and quantity of fuel burned in this emissions unit.
- (6) If for each shipment of biodiesel fuel received the concentration of the fuel exceeds the (B20) limit as received because the permittee wants to blend the fuel on site, then the permittee has committed to keeping a spreadsheet on site identifying the information of the biodiesel use in d)(2) above and to sample the biodiesel fuel (B20) storage tank on at least a semiannual basis.
- (7) See 40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480 – 63.7575).

e) Reporting Requirements

- (1) The permittee shall submit quarterly deviation (excursion) reports that identify the following:
  - a. all exceedances of the rolling, 12-month heat input and renewable fuel usage rate limitations for emissions units B002 and B003.

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

- (2) The permittee shall notify the Director (the Portsmouth Local Air Agency) in writing of any record that shows a deviation of the allowable sulfur dioxide emission limitation based upon the calculated sulfur dioxide emission rates from d)(3) above. The notification shall include a copy of such record and shall be sent to the Director (the Portsmouth Local Air Agency) within 45 days after the deviation occurs.
- (3) The permittee shall notify the Portsmouth Local Air Agency of any fuel burned in these emissions units other than biodiesel fuel or No. 2 fuel oil. The notification shall include a copy of such record and shall be sent to the Director (the Portsmouth Local Air Agency) within 45 days after the deviation occurs.
- (4) The permittee shall submit deviation (excursion) reports that identify each day when a prohibited fuel (i.e., one other than distillate oil) was burned in this emissions unit. Each report shall be submitted within 30 days after the deviation occurs.
- (5) The permittee shall submit deviation (excursion) reports that identify all exceedances of the biodiesel concentrations identified in d)(6) above, should the results from the biodiesel fuel storage tank exceed (B20) or greater than 20% biodiesel from the semiannual testing.
- (6) See 40 CFR Part 63, Subpart DDDDD (40 CFR 63.7480 – 63.7575).

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:

SO<sub>2</sub> emissions shall not exceed 1.6 lbs/mmBtu actual heat input.

Applicable Compliance Method:

Compliance with the allowable SO<sub>2</sub> emission limitation shall be demonstrated by documenting that the sulfur content of each shipment of oil received during a calendar month meets the limitation.

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.

b. Emission Limitation:

Visible particulate emissions 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 in accordance with Test Method 9, as set forth in "Appendix on Test Methods" in 40 CFR Part 60 ("Standards of Performance for New Stationary Sources"), as such Appendix existed on July 1, 2002.

c. Emission Limitations:

PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions shall not exceed 0.84 ton per rolling, 12-month period.

NO<sub>x</sub> emissions shall not exceed 1.93 tons per rolling, 12-month period.

SO<sub>2</sub> emissions shall not exceed 67.07 tons per rolling, 12-month period.

Applicable Compliance Method:

Compliance shall be demonstrated by adding the current month's emissions to the preceding eleven calendar months. Monthly emissions shall be determined by multiplying the associated emission factors from AP-42 Section 1.3 (5/10) in lb/10<sup>3</sup> gallons (PM/PM<sub>10</sub>/PM<sub>2.5</sub> and SO<sub>2</sub>) or by NO<sub>x</sub> emission factor calculated from the March 2010 test by the biodiesel fuel and/or No. 2 fuel oil consumed and then dividing by 2000 lbs/ton.

d. Emission Limitation:

Particulate emissions shall not exceed 0.020 lb/mmBtu actual heat input.

Applicable Compliance Method:

For the use of No. 2 fuel oil and biodiesel fuel, the short term emission limitation is based upon the emission unit's potential to emit and the manufacturer's



guaranteed emissions data as provided in the application for PTI P0107275 submitted on December 3, 2010 and in the application for PTI P0119771 submitted on October 27, 2015.

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 5.

e. Emission Limitation:

**While burning biodiesel fuel B20:**

NO<sub>x</sub> emissions shall not exceed 0.23 lb/mmBtu actual heat input.

Applicable Compliance Method:

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 7.

- (2) Compliance with the sulfur content shall be demonstrated by the record keeping requirements specified in d)(3).

g) Miscellaneous Requirements

- (1) None.